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MAY 13, 2026

# PLANNING JUSTIFICATION REPORT & AGRICULTURAL IMPACT ASSESSMENT

OFFICIAL PLAN AND ZONING BY-LAW AMENDMENT

## Proposed Sports Facility

15117 Medway Road  
Middlesex Centre, Ontario

PREPARED FOR:

**Heikal Group Inc.**

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# Introduction



# 1.0 Introduction

## 1.1 Purpose

**Monteith Brown Planning Consultants (“MB”)** was retained by Heikal Group Inc. (c/o Mostafa Heikal) to prepare this combined Planning Justification Report & Agricultural Impact Assessment in support of site-specific applications to amend both the Middlesex Centre Official Plan and Middlesex Centre Zoning By-law (2005-005) as it applies to the lands municipally known as 15117 Medway Road (“subject lands”) in Middlesex Centre, Ontario.

The proposed planning approvals seek to permit the construction of a private sports facility featuring a soccer field, running track, basketball courts, tennis courts, among other recreational facilities, together with an associated day nursery, small restaurant, 48 overnight accommodation units, limited associated retail space and office space to operate the facility.

The purpose of this report is to assess the land use planning merits of the proposed Official Plan Amendment (“**OPA**”) and Zoning By-law Amendment (“**ZBA**”), as well as determine the appropriateness of the proposed development from a land use planning perspective. This analysis considers the proposal in relation to the surrounding community and the applicable planning framework, including the Provincial Planning Statement 2024, the Middlesex County Official Plan, Middlesex Centre Official Plan, the Middlesex Centre Zoning By-law (2005-005) and Upper Thames River Conservation Authority (“**UTRCA**”) policies. In addition to the relevant planning policy analysis, this report includes an Agricultural Impact Assessment (“**AIA**”) completed in accordance with Ontario Publication 861.

## 1.2 Site Description

The subject lands are comprised of approximately 10 hectares (26 acres) and are located less than 400m from the urban settlement area of Ballymote, along County Road 28 (Medway Road), immediately north of the municipal boundary between the City of London and the Municipality of Middlesex Centre. The subject lands contain a single detached dwelling towards the west side of the parcel, along with an accessory shop and surrounding landscaped area.

A channelized portion of the West Stoney Creek traverses the property northeast-southwest. The existing dwelling on the property is situated south of the West Stoney Creek, with a driveway extending over the creek to provide legal road access. South and East of the house, the land is utilized for growing field crops. In the northwest corner of the subject lands, a small pond is connected to the West Stoney Creek. The pond is connected to another drainage feature, known as the Armitage Drain, which extends north of the subject lands and under Medway Road.

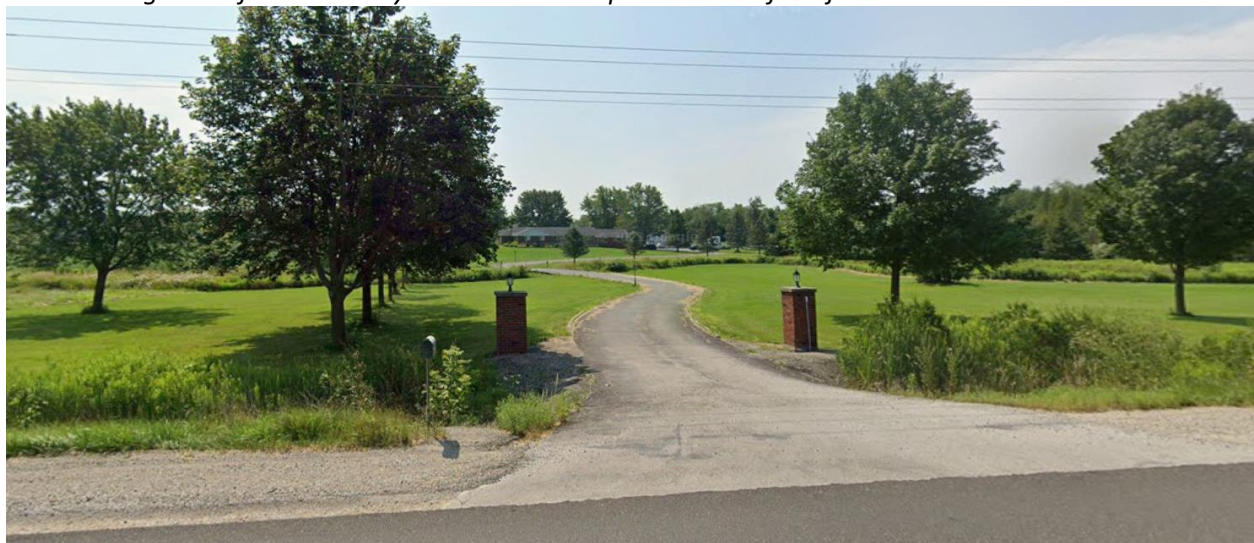
Historical aerial imagery depicts both the existing dwelling and accessory shop in existence on April 8, 2004 with only minor changes to the layout of the property since that time.

**Figure 1 | Subject Lands Overview**



Source: MB, 2026

**Figure 2 | Existing Access to Dwelling on Subject Lands**  
View looking South from Medway Road at Landscaped Portion of Subject Lands



Source: Google Maps Street View (Image capture: August 2021)

**Figure 3 | Frontage of Subject Lands Along Medway Road**  
*View looking South from Medway Road at Agricultural Portion of Subject Lands*

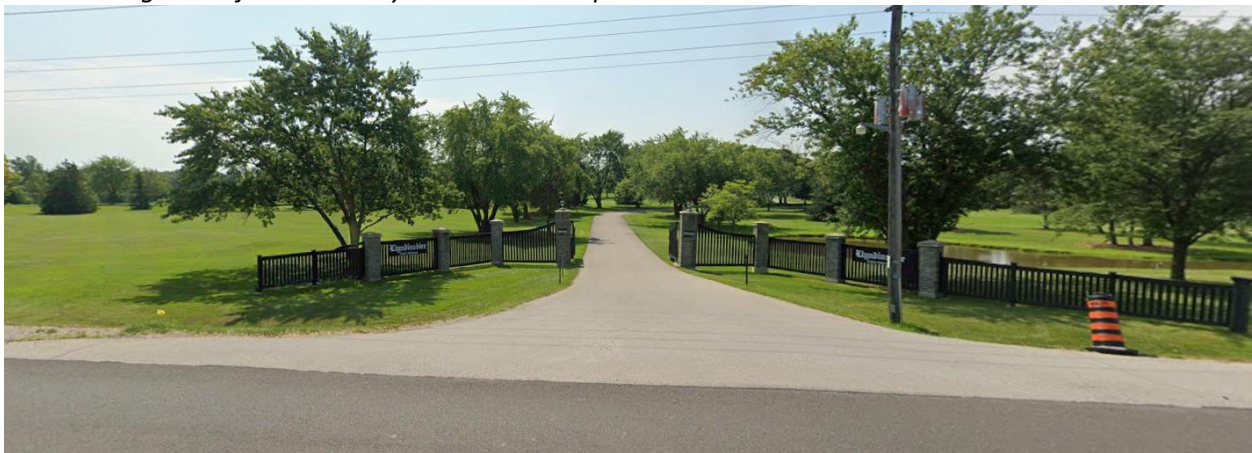


Source: Google Maps Street View (Image capture: August 2021)

### 1.3 Land Use Context

While the surrounding context is predominantly agricultural in nature, Llyndinshire Golf Course and Woodlands adjacent to the subject lands are not used for agricultural production, nor is the nearby Ballymote settlement area, situated approximately 400 metres northeast of the subject lands. The proponent owns additional lands between the subject lands and Lyndinshire Golf Course.

**Figure 4 | Frontage of Lyndinshire Golf Course, Neighbouring the Subject Lands**  
*View looking South from Medway Road at access point*



Source: Google Maps Street View (Image capture: August 2021)

**Figure 5 | Land-Use Context Map**



Source: MB, 2026

**Figure 6 | View of Woodlands and Wetlands on Adjacent Property**  
View looking south from Medway Road at western boundary of subject lands



Source: Google Maps Street View (Image capture: August 2021)

The subject lands are situated within a predominantly rural and semi-rural landscape characterized by a mix of agricultural fields, woodlands, and low-density settlement areas. To the north and west, the lands are bordered extensively by agricultural uses, consisting of large open fields that form part of the broader

rural fabric of the area. These agricultural areas are interspersed with pockets of woodland, which contribute to the natural heritage character of the surrounding environment. The Ballymote Settlement Area contains a small cluster of residential development, along with a service commercial use, Petro-Canada. This settlement cluster represents a nearby concentration of non-agricultural land uses. Ballymote is located along Highbury Avenue, or County Highway 23, which serves as a major transportation route into the City of London.

To the south, the land use transitions toward a more urbanized condition within the boundary of the City of London. South of the municipal boundary line, residential neighbourhoods form a clear contrast to the predominantly rural lands to the north. Additional woodland areas create a natural buffer between the subject lands and these residential communities. Adjacent to the subject lands, to the west, the Lyndinshire Golf & Country Club introduces recreational land use within close proximity to the subject lands, while Centennial Public School is situated just beyond, contributing to the diversity of surrounding uses.

**Figure 7 | View from Residential Development South of Subject Lands**

View looking north from Springridge Drive at pedestrian path towards woodlands adjacent to subject lands



Collectively, the area displays a clear gradation from agricultural and natural lands in the north toward suburban residential development in the south, with the subject lands centrally positioned within this transitional context.

## 1.4 Pre-Application Consultation

A Pre-Application Consultation Meeting was held on September 11, 2025, between the proponent, MB, County of Middlesex, Municipality of Middlesex Center and Upper Thames River Conservation Authority Staff to discuss the proposed sports facility on the subject lands. More specifically, the purpose of the meeting was to discuss the proposed development and to gather input and comments on the preliminary issues for consideration and requirements for the submission of complete Official Plan and Zoning By-Law Amendment applications.

The development proposal discussed involved establishing a new indoor/outdoor recreational facility on approximately 8 hectares of land currently designated Agriculture with an Aggregate Resource Overlay and zoned Agricultural (A1). To permit the proposed use, the Municipality confirmed that an Official Plan Amendment (OPA), Zoning By-law Amendment (ZBA), and Site Plan Approval will be required. Staff anticipated significant public interest and recommend early community outreach prior to submitting formal planning applications.

Following the pre-application consultation meeting, discussions between the proponent, MB, Municipality of Middlesex Centre and County of Middlesex Staff continued, to further refine the list of required technical studies for a complete OPA and ZBA application package. These discussions resulted in the following studies, noting that further refinement of the development plan will come at Site Plan Stage:

- 1) Planning Justification Report (“**PJR**”)
  - Prepared by a qualified planner, addressing:
    - Description of the proposed facility and operations
    - Policy analysis (PPS, OPA policies) regarding non-agricultural uses in prime agricultural areas
    - Evaluation of alternative locations and justification for use outside a settlement area
    - Servicing approach
    - Agricultural Impact Assessment (“**AIA**”) including MDS analysis
    - Anticipated traffic generation
    - Mitigation strategies for impacts on nearby rural residential areas (including Ballymote)
    - Requested site-specific zoning provisions
- 2) Servicing Requirements
  - Servicing letter/brief to evaluate the feasibility of implementing a servicing strategy for the intensity of use on the subject lands
- 3) Transportation Requirements
  - Traffic Impact letter/brief to evaluate site-generated traffic

Requirements for Site Plan Stage:

- 1) Site Plan and Technical Drawing Set
  - A full Site Plan Approval package is required, comprising:
    - Detailed site plan with dimensions, zone boundaries, and required exceptions
    - Engineer-stamped drawing set
    - Existing conditions and erosion/sediment control plans
    - Servicing drawings (water, stormwater, sanitary), including external works if applicable

- Full grading plan with 15m of off-site topographic extensions
  - Notes and standard details
  - Landscaping plan
  - Photometric/lighting plan
- 2) Natural Heritage
- Development Assessment Report (“DAR”)
  - Identifies natural heritage features, including significant features west and south of the site. The Municipality will retain NSRI to peer review the DAR.
  - Environmental Compliance Approvals (ECAs) for stormwater and private sewage systems.
  - Drinking water for the recreational use will fall under the Health Protection and Promotion Act (Ministry of Health oversight).
  - Additional permits may be required for water taking
- 4) Stormwater & Servicing Reports
- Stormwater Management (“**SWM**”) Report: Must demonstrate post-development flows controlled to pre-development levels up to the 100-year, 24-hour event; identify external flows through the site.
  - Servicing Report outlining approaches for private or municipal servicing.
  - Geotechnical Report addressing infiltration feasibility and groundwater conditions.
  - Reference Plan for road dedications.
- 3) Conservation Authority Requirements (UTRCA) Drawing Set
- Municipality and UTRCA will coordinate with the proponent on hazard mitigation related to West Stoney Creek Drain.
  - UTRCA comments from September 12, 2025, must be addressed.
- 5) Transportation Requirements
- Traffic Impact Assessment (“**TIA**”) to evaluate required County Road improvements on Medway Road.
  - Up to two access points from Medway Road may be permitted.
- 4) Fire Protection Requirements
- Internal crossings must support fire vehicles.
  - On-site firefighting water supply is required and must not negatively affect surrounding groundwater resources.

# Development Proposal

## 2.0 Development Proposal

### 2.1 Goals and Objectives

The goals and objectives for the proposed development of the subject lands into a Private Community Sports Facility include:

- Provide recreational opportunities for the local community to fill an identified need;
- Attract sporting events from the broader region to enjoy the benefits of Middlesex Centre;
- Creation of jobs for the local community;

### 2.2 Proposed Development

The proponent is proposing to construct a private indoor sports facility on the subject lands, as seen in the appended drawing package. The proposed sports facility is proposed to be approximately 27,655 square metres in building size, containing a soccer field, running track, basketball courts and tennis courts among other recreational amenities. The facility is intended to draw a large crowd from the region and beyond, coming together in community to celebrate sport and active living. As such, the complex will feature approximately 48 overnight accommodation rooms, 1,240 square metres of nursery space, 1,596 square metres of restaurant and 2,647 square meters of retail space in addition to the recreational facilities provided. All of these uses will be encompassed within one multi-use building.

Sufficient parking and access to the facilities will be provided on the remainder of the subject lands.

Addressing the communities need for a large-scale sporting venue, the proposed development provides a facility that is missing in the northern portion of the municipality, drawing a large economic benefit into the borders of Middlesex Centre.

At this time, the proponent is seeking approval for the land use in general, through concurrent Official Plan and Zoning By-law amendments. Technical studies in support of the proposal have been scoped to this preliminary stage, with the proponent acknowledging that further refinement to the built form, limit of development and servicing infrastructure requirements will come during the Site Plan Approval Stage. To address these requirements, a holding zone is proposed to be placed on the subject lands to ensure the completion of the required technical studies will occur prior to site disturbance and further development. The proposed sports facility will be serviced by private services including a private sanitary package plant waste treatment facility.

The sites location along a major arterial roadway will be beneficial for convenient access, while handling the traffic generated by the use. The subject lands are located in close proximity to another major arterial road, Highbury Ave. (County Road 23), and the Ballymote settlement area, which is currently developing for increased residential uses.

Figure 8 | Conceptual Rendering of Front Façade of Sports Facility



Source: Creative Structures, 2025

Figure 9 | Overall Conceptual Rendering of Sports Facility



Source: Creative Structures, 2025



# Technical Studies

## 3.0 Technical Studies

### 3.1 Flood Mapping

A comprehensive flood hazard assessment was completed by Greck and Associates Limited (“Greck”) for the subject lands, to establish regulatory floodplain limits in support of future development. In the absence of existing UTRCA floodplain mapping, Greck developed a detailed hydrologic and hydraulic analysis of West Stoney Creek and Armitage Drain using updated PCSWMM and HEC-RAS models refined with LIDAR topography, current land-use, soils data, and surveyed crossing structures.

Peak flows were generated for the 250-year regulatory storm, and a robust sensitivity analysis—accounting for key hydrologic and hydraulic uncertainties, including climate-related variability—confirmed that the models provide reliable delineation of flood hazard extents. The resulting floodplain mapping identifies development constraints and demonstrates that maximum flood level variations under sensitivity scenarios remain within acceptable tolerances.

Based on this analysis, the study recommends applying a 0.3 m freeboard to all proposed development areas to satisfy provincial and UTRCA safety standards and confirms that safe vehicular and pedestrian access can be achieved during the regulatory event. The completed mapping and recommendations provide the technical basis for establishing appropriate development setbacks and ensuring that future site planning proceeds in accordance with municipal and provincial flood hazard policies.

The study further concluded that safe ingress and egress will be provided from Medway Road, however, safe ingress and egress to the proposed development will be revisited and determined once a grading plan for the proposed development has been prepared.

The full Flood Modelling Study has been submitted alongside this report, along with a full-size PDF of the mapping. The modelling was submitted on March 9, 2026 to the UTRCA for their review and comment. Revisions will occur, if necessary, with implementation of the refinements to occur during the Site Plan stage of the development.

### 3.2 Preliminary Environmental Assessment

Beacon Environmental Limited was retained by Heikal Group Inc. to prepare a Preliminary Natural Heritage Assessment and associated Terms of Reference for a Development Assessment Report (DAR) in support of an Official Plan Amendment, Zoning By-law Amendment, and a future Site Plan Application for a proposed sports centre at 15117 Medway Road in the Municipality of Middlesex Centre. The preliminary assessment is intended to support the OPA/ZBA applications, while a scoped and more detailed DAR will be completed at the Site Plan Approval stage, potentially secured through a holding provision, in accordance with discussions held with municipal and county planning staff on April 24, 2026.

Natural heritage features on and adjacent to the subject property include components of the Arva Moraine Provincially Significant Wetland (PSW), additional wetlands, floodplain, watercourses with fish

habitat, and an adjacent significant woodland to the west. Portions of West Stoney Creek and the Armitage Drain traverse the northern portion of the property and fall under the regulatory jurisdiction of the Upper Thames Conservation Authority (UTRCA). The western adjacent woodland is identified as significant in the Middlesex County Official Plan. These features establish key natural constraints that inform development limits for the subject lands.

Beacon conducted site investigations on November 10, 2025 and April 27, 2026 to document existing conditions. The subject property consists primarily of agricultural fields, with a single detached dwelling, accessory structure, driveway, and maintained lawn area. Based on field review and background data, Beacon confirmed the presence of floodplain, provincially significant and non-provincially significant wetlands, watercourses with fish habitat, and adjacent woodlands. The floodplain associated with the watercourses at the north end of the site represents the dominant constraint, with the proposed development generally located outside the regulated floodplain except for a driveway crossing.

Wetland features include a portion of the Arva Moraine PSW extending into the northwest corner of the property, characterized as a shallow aquatic pond and cattail marsh associated with the Armitage Drain, as well as a mineral meadow marsh along West Stoney Creek dominated by reed canary grass, phragmites, and cattails. Consistent with UTRCA policy, a 30-metre buffer has been applied to the PSW and a 15-metre buffer to other wetlands smaller than two hectares. These buffers are exceeded by the floodplain limits in most areas. Beacon notes that wetland buffers may be refined at the Site Plan stage to reflect any updates to UTRCA policy.

The subject property contains two watercourses: the Armitage Drain and West Stoney Creek. The Armitage Drain is classified by Fisheries and Oceans Canada as Type F fish habitat and by the Ministry of Natural Resources as non-sensitive, supporting a warm-water fish community. West Stoney Creek is expected to support a similar fish community downstream, although upstream sections have been enclosed and are not anticipated to support fish. A 15-metre buffer is recommended for both watercourses, with a 30-metre buffer applied to the Armitage Drain where it coincides with the PSW, subject to confirmation through future detailed study.

A woodland located on adjacent lands west of the subject property is identified as a significant woodland in the Middlesex County Official Plan. Beacon characterized this feature as a cultural woodland with an open canopy and a dense understory dominated by invasive European buckthorn, with canopy species including black cherry, ash, white cedar, white pine, and sugar maple. For the purposes of establishing preliminary development limits for the OPA/ZBA, a 10-metre buffer from this woodland is recommended, subject to refinement through the Site Plan DAR.

The preliminary assessment concludes that the proposed sports centre is situated within the agriculturally cultivated portion of the site and, with the exception of a driveway crossing and potential stormwater outlet, avoids key natural heritage features, hazards, and recommended buffers. Potential direct and indirect impacts associated with these limited encroachments will be assessed, and mitigation measures will be identified, through the DAR prepared at the Site Plan stage.

The DAR to be submitted in support of Site Plan Approval will include a comprehensive background policy review, seasonal field investigations, and detailed impact assessment. Fieldwork will consist of vegetation and ecological land classification surveys, amphibian surveys, breeding bird surveys, aquatic habitat assessment, and wetland staking if required. The site will also be screened for potential habitat for threatened or endangered species, with additional species-specific surveys undertaken as necessary to ensure conformity with the Ontario Species Conservation Act and the federal Species at Risk Act.

Upon completion of these investigations, the DAR will document natural heritage features and boundaries, confirm or refine buffers and development limits, assess potential impacts of the proposed development, recommend mitigation and enhancement measures, and evaluate conformity with applicable provincial, municipal, and conservation authority policies and regulations. The preliminary assessment and Terms of Reference demonstrate that the proposed development can be appropriately accommodated on the subject property while avoiding and protecting natural heritage and hydrological features, subject to confirmation through the detailed Site Plan review process.

### 3.3 Preliminary Servicing Report

Raft Consultants Inc. prepared a Site Servicing Brief (dated February 24, 2026) for the proposed development. The brief outlines the proposed servicing strategy for sanitary servicing, water supply and fire protection, stormwater management, and erosion and sediment control, in accordance with the County of Middlesex Infrastructure Design Standards and applicable provincial guidelines.

Municipal sanitary servicing is not available along Medway Road; therefore, the development will be serviced by a private on-site wastewater treatment plant (WWTP) designed to treat all domestic sewage generated by the proposed uses. The sanitary system will include sanitary manholes, interconnecting PVC piping, the WWTP, an effluent sampling chamber, and an outfall discharging to the adjacent natural watercourse. The system will be designed in accordance with the Ontario Ministry of the Environment, Conservation and Parks (MECP) Design Guidelines for Sewage Works and will require an Environmental Compliance Approval (ECA) under the Environmental Protection Act. A detailed Assimilative Capacity Study and receiving water assessment will be completed to at the site plan approval stage to confirm the ability of the watercourse to accept treated effluent in accordance with MECP F-5 series policies. Effluent quality limits will be established through the ECA process, and the WWTP will be located on-site with appropriate access for maintenance, year-round operation, and compliance monitoring.

Domestic water supply for the development will be provided through on-site groundwater wells, with individual or shared systems sized to meet projected occupancy and demand. Infiltration galleries will be incorporated to promote aquifer recharge and support groundwater sustainability. Fire protection will be provided by dry fire hydrants supplied by both on-site groundwater wells and filtered, stored stormwater. Stormwater used for fire protection will be routed through sediment removal and filtration components before entering a dedicated storage chamber sized to meet fire-flow requirements. All fire protection infrastructure will be designed in accordance with applicable local fire code requirements and the Ontario Fire Code.

As no municipal storm sewer infrastructure exists along Medway Road, stormwater runoff will be managed entirely on-site through collection, treatment, infiltration, evaporation, and controlled discharge. Runoff will be conveyed via catch basins and catch basin manholes to infiltration and evaporation ponds designed to promote groundwater recharge and reduce peak flows. Prior to any discharge to the adjacent watercourse, stormwater will be treated using Stormceptor units, oil-grit separators, or equivalent MECP-approved devices to achieve effective removal of total suspended solids, hydrocarbons, and floatables. The feasibility of discharging treated stormwater to the watercourse will be confirmed in coordination with relevant regulatory agencies, and all stormwater management components will be designed in accordance with County of Middlesex standards, MECP guidelines, and accepted engineering practices.

An erosion and sediment control program will be implemented during construction to prevent sediment transport off-site and protect adjacent lands and watercourses. Measures will include minimizing disturbed areas and duration of soil exposure, installation of mud mats at site access points, inlet protection at catch basins and storm manholes, perimeter silt fencing in accordance with OPSD 219.130 or equivalent, regular inspection and maintenance, removal of accumulated sediment when 50 percent of design capacity is reached, dust control measures, and decommissioning of controls following site stabilization through paving, landscaping, and restoration.

### 3.4 Traffic Impact Statement

A Traffic Impact Statement was prepared by RC Spencer Associates Inc. in April of 2026 to evaluate the anticipated traffic effects of the proposed Medway Sport Centre at 15117 Medway Road, a multi-use recreational development comprising a recreation/athletic facility, restaurant, retail, office, hotel, and day care uses.

Trip generation was conservatively estimated using the Institute of Transportation Engineers (ITE) Trip Generation Manual (12th Edition), with no reductions applied for internal trip capture despite the complementary nature of the proposed uses. The analysis estimates total peak hour trip generation of approximately 1,455 trips during the weekday AM peak, 2,243 trips during the weekday PM peak, and 1,725 trips during the Saturday peak hour. Given the high likelihood of internal capture, the consulting engineers conclude that the actual on-street traffic impact is expected to be approximately half of these volumes, equating to an estimated increase of 12 to 16 vehicles per minute on Medway Road during peak periods.

The report concludes that the surrounding road network can accommodate the anticipated traffic volumes, with a more detailed Traffic Impact Assessment to be completed at the Site Plan Control stage to confirm any required geometric or traffic control improvements.

# Agricultural Impact Assessment

## 4.0 Agricultural Impact Assessment (“AIA”)

### 4.1 Introduction

This AIA has been prepared to evaluate the impacts on the agricultural systems of the area regarding a proposed sports facility to be developed at 15117 Medway Road in the Municipality of Middlesex Centre, Ontario, where the proponent is seeking to expand local recreational infrastructure, through a private sports facility, to meet growing community needs. The purpose of this study is to evaluate the impacts of the proposed development on the surrounding agricultural system and to demonstrate how the project satisfies the requirements of the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) as outlined in their Agricultural Impact Assessment Guidelines (Publication 861), as well as provide recommendations on mitigation strategies to ensure there are no negative effects on the agricultural system as a whole.

The assessment incorporates a combination of desktop review, GIS-based mapping analysis, and field observation to identify existing agricultural operations, land use patterns, and potential sources of agricultural and land use conflict. Information sources include municipal and provincial land use data, Agricultural System mapping, aerial imagery, Ontario GeoHub soil surveys, and applicable planning documents. The study has also been coordinated with related technical assessments—including traffic, and servicing studies—that may influence agricultural viability or compatibility. Field investigations and data collection supporting this AIA were completed during 2026, ensuring that seasonal conditions and on-the-ground agricultural activity were appropriately documented.

### 4.2 Study Areas

The Study Area for the proposed sports facility on the subject lands is organized into a Primary Study Area (“PSA”) and a Secondary Study Area (“SSA”), consistent with provincial guidance for AIA. The PSA encompasses the project footprint and all lands subject to direct construction and operational effects. The SSA provides a broader context within which to identify indirect and cumulative impacts on the agricultural system (e.g., access, traffic, drainage, Minimum Distance Separation (MDS), and farm operations and logistics), and to evaluate potential land use compatibility and agri-food network considerations.

#### Primary Study Area

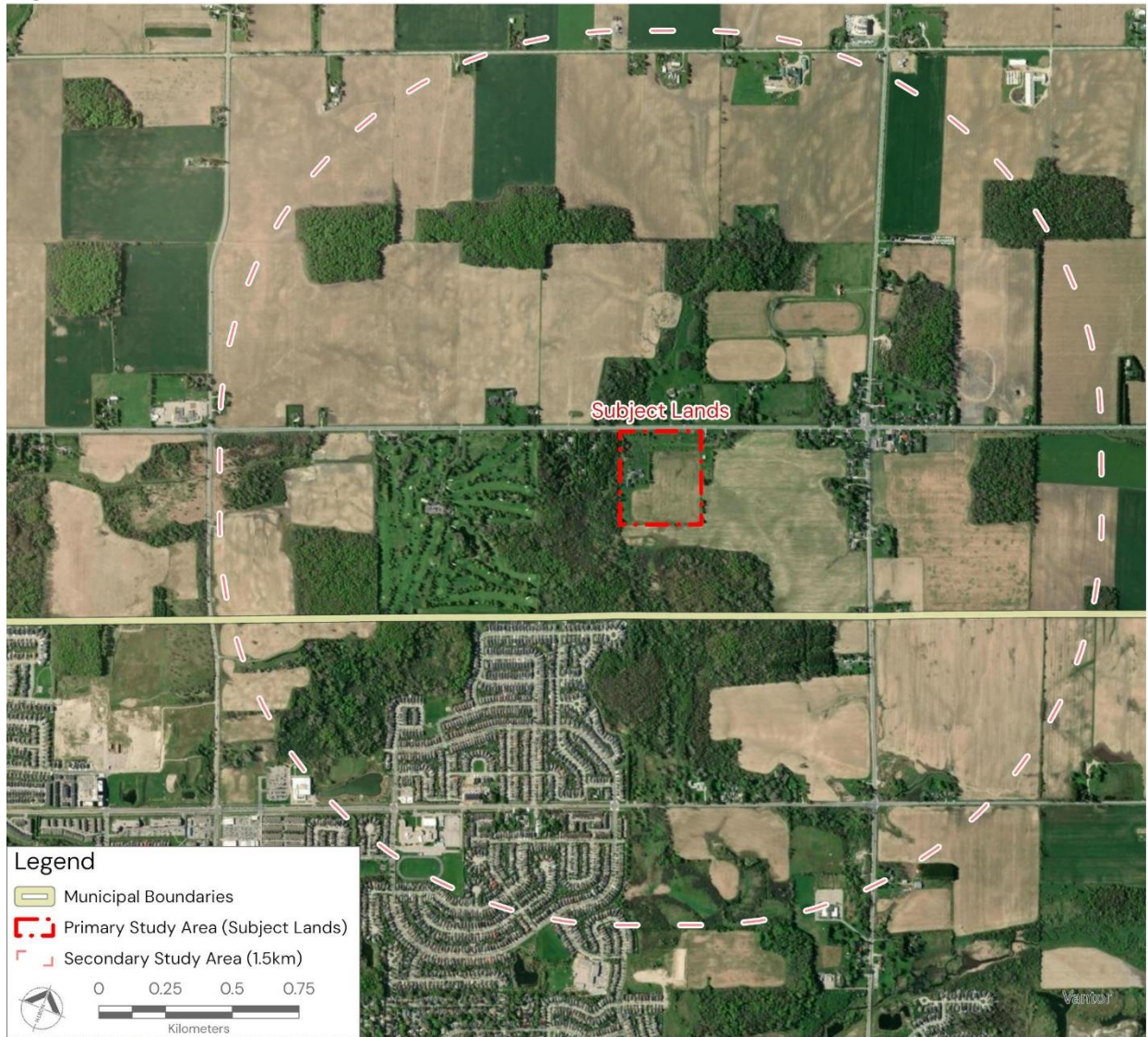
The PSA is the subject lands, as illustrated in **Figure 1**, which is delineated to include the entirety of the proposed sports facility, including building footprint, parking, stormwater management facilities, on-site access, servicing and grading areas.

#### Secondary Study Area

The Secondary Study Area (SSA) extends 1.5 kilometres beyond the Primary Study Area (PSA), identified to capture surrounding features and relationships that may reasonably interact with or be influenced by the proposed development. This includes nearby farms and barn structures that may be relevant for

Minimum Distance Separation (MDS) considerations, as well as local haul routes and road segments commonly used by farm vehicles that could experience interactions with peak facility traffic. The SSA also encompasses hydrologic and drainage connections, such as municipal drains and downstream receptors, to ensure potential off-site effects are appropriately assessed. In addition, consideration is given to elements of the broader agri-food network within the SSA, including grain elevators and agricultural input suppliers, which support the surrounding farm economy and contribute to the area’s overall agricultural function.

**Figure 11 | Overview of Primary and Secondary Study Areas**



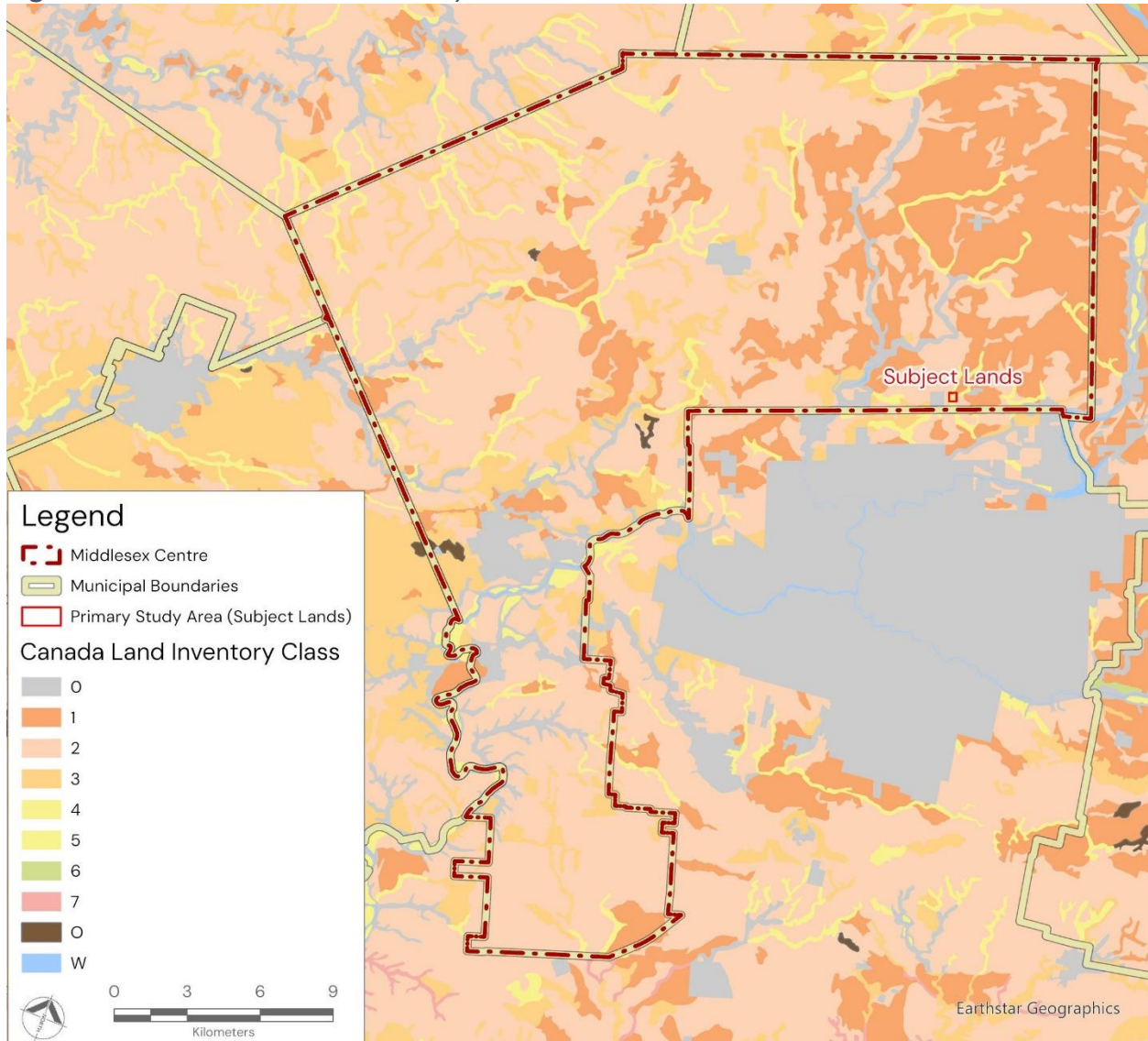
Source: MB, 2026

### Alternative Locations

The PPS requires that alternative locations be evaluated which avoid *prime agricultural areas*, and within prime agricultural areas, on lower priority agricultural lands. Considering the PPS definition of *prime agricultural areas* means areas where *prime agricultural lands* – Canada Land Inventory (“CLI”) Class 1, 2

and 3 lands – predominate, the entirety of Middlesex Centre is classified as prime agricultural area, as seen in **Figure 12**, below.

**Figure 12 | Canada Land Inventory for Middlesex Centre**

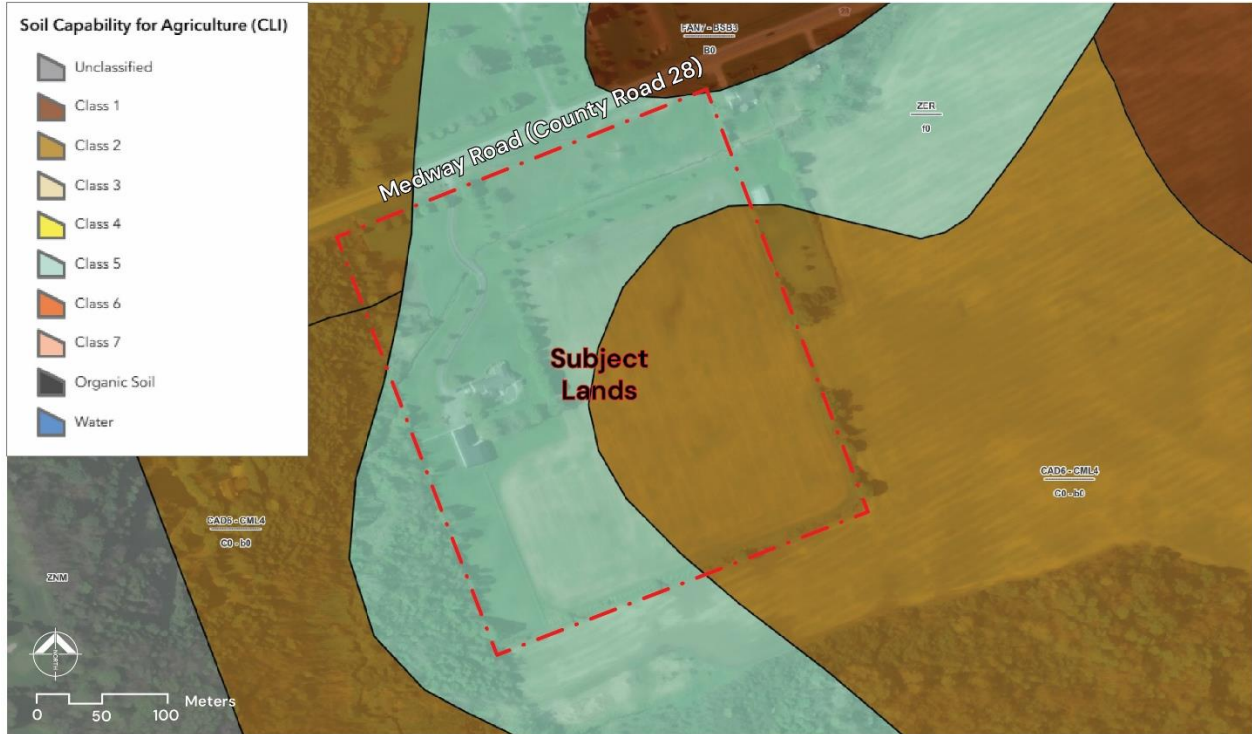


Source: Ontario Geohub, Middlesex County Open Data, MB 2026

As seen in **Figure 13**, below, the subject lands are primarily CLI Class 5, a relatively low soil classification within the municipality, with an area of Class 2 towards the southeast corner. The lowest priority agricultural lands are class 0, which can be seen within Middlesex Centre in areas centered around the Ilderton, Komoka, Kilworth and Delaware Settlement areas. Further, ribbons of Class 0 lands are found along various rivers and creeks throughout the Municipality. In review of these class 0 areas, there are no parcels large enough to accommodate a sports facility as proposed by the proponent. Further, as discussed in **Section 5.1 Provincial Planning Statement**, below, the need for a large recreation facility has been identified by the municipality through the Municipality of Middlesex Centre Community Services Master Plan in the northern portion of the Municipality.

In reviewing alternative locations within the northern portion of the municipality, the Ilderton settlement area contains four parcels large enough (greater than 7 hectares) to accommodate the proposed use at the southern edge of the settlement, however, they are classified as Class 2 soils in the Canada Land Inventory and are designated for employment use, another protected designation which is not to be used for recreation, in the Middlesex Centre Official Plan.

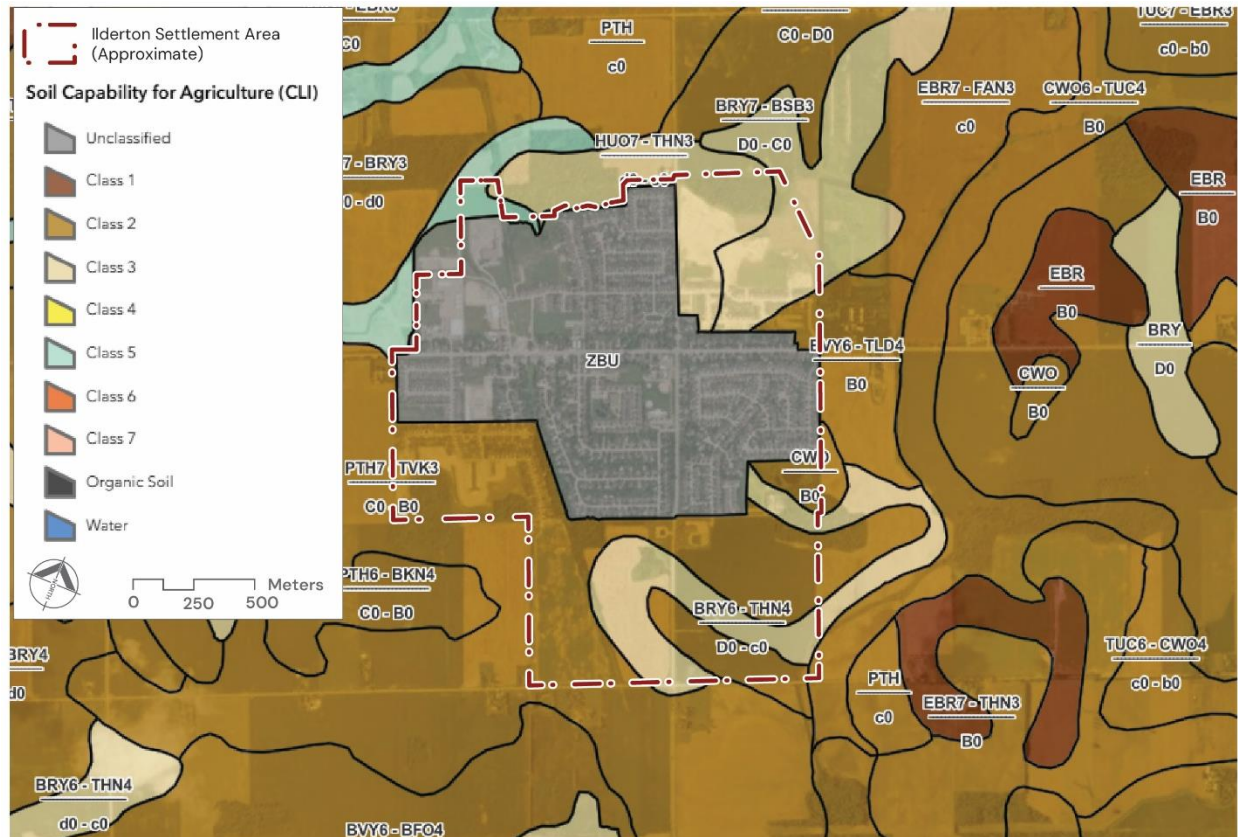
**Figure 13 | Excerpt from Ontario Survey Complex Viewer – Subject Lands**



Source: Ministry of Agriculture, Food and Agribusiness, Applications and Maps

In addition to the alternative locations, the subject lands provide opportunity to co-locate two larger scale recreational uses (Lindinshire Golf Course and the proposed development) in close proximity, establishing a recreational destination within the municipality, clustering similar land uses together.

**Figure 14 | Excerpt from Ontario Survey Complex Viewer – Ilderton**



Source: Ministry of Agriculture, Food and Agribusiness, Applications and Maps

Considering the subject lands relatively low CLI classification, and reviewing the Municipality as a whole, there are no alternative locations of adequate size (approximately 7 hectares) on lower priority agricultural lands within the northern portion of Middlesex Centre, where the demonstrated need for additional recreation facilities has been identified, as discussed below in **Section 5.1 Provincial Planning Statement**.

### 4.3 Assessment of Impacts

The following section evaluates the potential impacts of the proposed sports facility on the agricultural system within the PSA and SSA. Impacts are assessed in accordance with OMAFRA’s Agricultural Impact Assessment Guidelines (Publication 861) and include consideration of direct, indirect, and cumulative effects on agricultural lands, operations, agri-food network components, and overall agricultural viability.

#### Direct Impacts

Development of the sports facility will permanently convert the PSA from active agricultural use to non-agricultural use. While most of the subject lands are classified as CLI soil Class 5, there is an area of approximately 3.9 hectares (9.5 acres) in the southeast corner which is classified as CLI soil Class 2. Despite the approximate 3.9 hectares of land classified as CLI Class 2, approximately 5.7 hectares (14 acres) of the subject lands are actively cultivated for field crops common to the area such as wheat, soybeans and corn.

Aside from the loss of farmland, other direct impacts of the proposed sports facility include the alteration of drainage, and disruption of soil structure on future viability of the subject lands to return to farmland. The proposal not only removes the property from being a viable agricultural unit, it significantly restricts the ability to convert the property back into agricultural production. This is a result from disruption of soil structure, compaction during construction, and loss of soil organic matter as agricultural soils are replaced with buildings, parking, hard surfaces, and turf.

The magnitude of direct loss is approximately 5.7 hectares of current cropland which is being lost. These impacts are permanent, although localized within the PSA boundary.

## **Indirect Impacts**

Potential indirect impacts on adjacent farm operations within the Secondary Study Area (SSA) have been considered in recognition of the area's ongoing agricultural use.

Indirect impacts include the following: Interactions of the sport facility traffic with slow-moving farm vehicles; Facility lighting may also influence nearby operations by affecting growth of crops from increased skyglow over adjacent fields; Similarly, facility shadows could affect crop growth in the adjacent field; Changes to site grading, impervious surfaces, and stormwater management could alter existing surface or subsurface drainage patterns, with the potential to affect crop productivity or result in field saturation on adjacent farmland, if not appropriately mitigated. The presence of sensitive receptors may further constrain pesticide application practices on neighbouring farms, potentially impacting yields or pest management strategies. In addition, broader land-use effects may occur, including upward pressure on land values that could increase the cost of agricultural expansion, evolving community expectations related to mixed rural and recreational land uses, and changes in farmers' perceptions of long-term agricultural viability and security in the surrounding area.

### Minimum Distance Separation (MDS) Implications

The introduction of recreational land use triggers MDS I requirements from two livestock operations within the SSA.

The first property is located at 15194 Medway Road, with the property boundary approximately 30 metres from the subject lands, featuring two separate livestock barns with potential to contain horses. Barn 1 is approximately 244 metres from the northeastern limit of the PSA (subject lands) and has an area of approximately 280 square metres, while Barn 2 is approximately 732 metres from the northeastern limit of the PSA and has an area of approximately 375 square metres. Aerial imagery illustrates that outdoor manure storage was located to the east of Barn 1, with no outdoor manure storage visible in proximity to Barn 2. From historical visits driving by 15194 Medway Road, horses can be found in the paddocks surrounding the barns, but typically only 4-6 horses are seen at a time.

The second property is located at 15205 Eight Mile Road and is known as Arlea Farms. The property boundary is approximately 724 metres from the subject lands and the farm contains one barn with approximately 1,354 square metres of area potential to contain beef cattle. The barn and manure storage

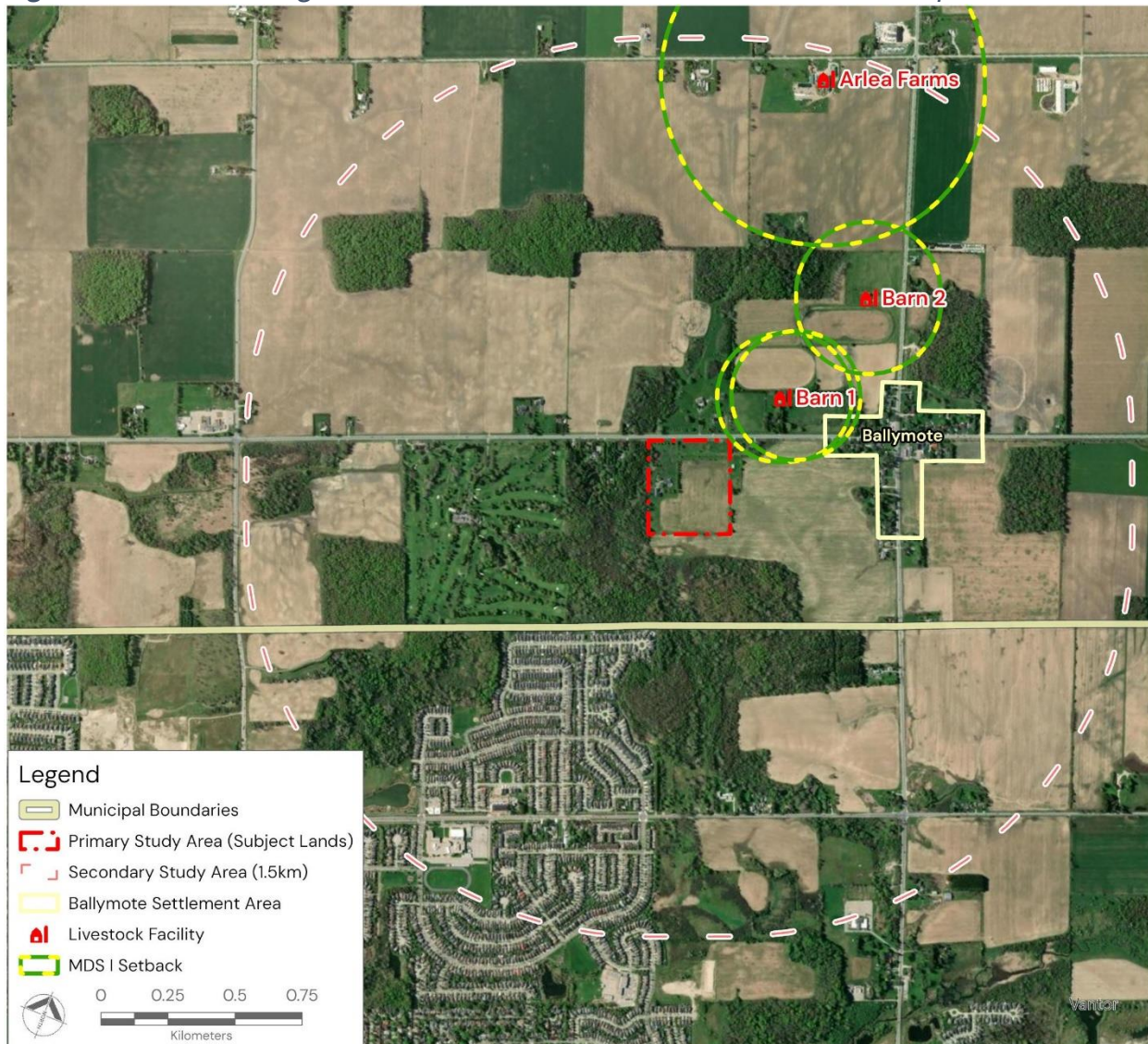
area is located approximately 1,346 metres from the subject lands. Aerial imagery illustrates several structures on the property, most of which suited for machinery or feed storage. The 1,356 square metres was calculated for the area of barn which contained adequate ventilation for the housing of cattle. An outdoor manure storage area is also illustrated in proximity to the barn.

MDS I calculations were completed using Ontario's AgriSuite software using an estimation of number of horses and cattle contained in each barn. Barn 1 was estimated to potentially house approximately 10 horses, Barn 2 was estimated to potentially house approximately 15 horses and Arlea farms was estimated to potentially house approximately 200 beef cattle. These estimations were confirmed as generous, through AgriSuite's estimated barn sizes for the number of livestock being larger than the existing building footprint calculated using GIS software.

Entering the above information into Ontario AgriSuite software for the calculation of MDS I distances, Barn 1 requires a minimum separation distance of 235 metres the barn and manure storage area east of the barn, Barn 2 requires a minimum separation distance of 265 metres and Arlea farms requires a minimum separation distance of 577 metres. These facilities and their required separation are illustrated in **Figure 15**, below. **The northern edge of the PSA is further away from the identified livestock facilities than the required Minimum Distance Separation.** It is also important to note that the proposed sports facility will be located further south than the northern PSA limit, due to the municipal drain and flooding hazard area along the northern end of the property.

If the livestock facilities were to expand, requiring MDS II calculations, they would be limited by their proximity to the Ballymote settlement area which is closer to the livestock facilities than the subject lands. As such, the proposed Sports Facility conforms to Minimum Distance Separation and does not impose additional restrictions on the expansion of nearby livestock operations.

**Figure 15 | Surrounding Livestock Facilities and Minimum Distance Separation Buffers**



Source: Monteith Brown, 2026

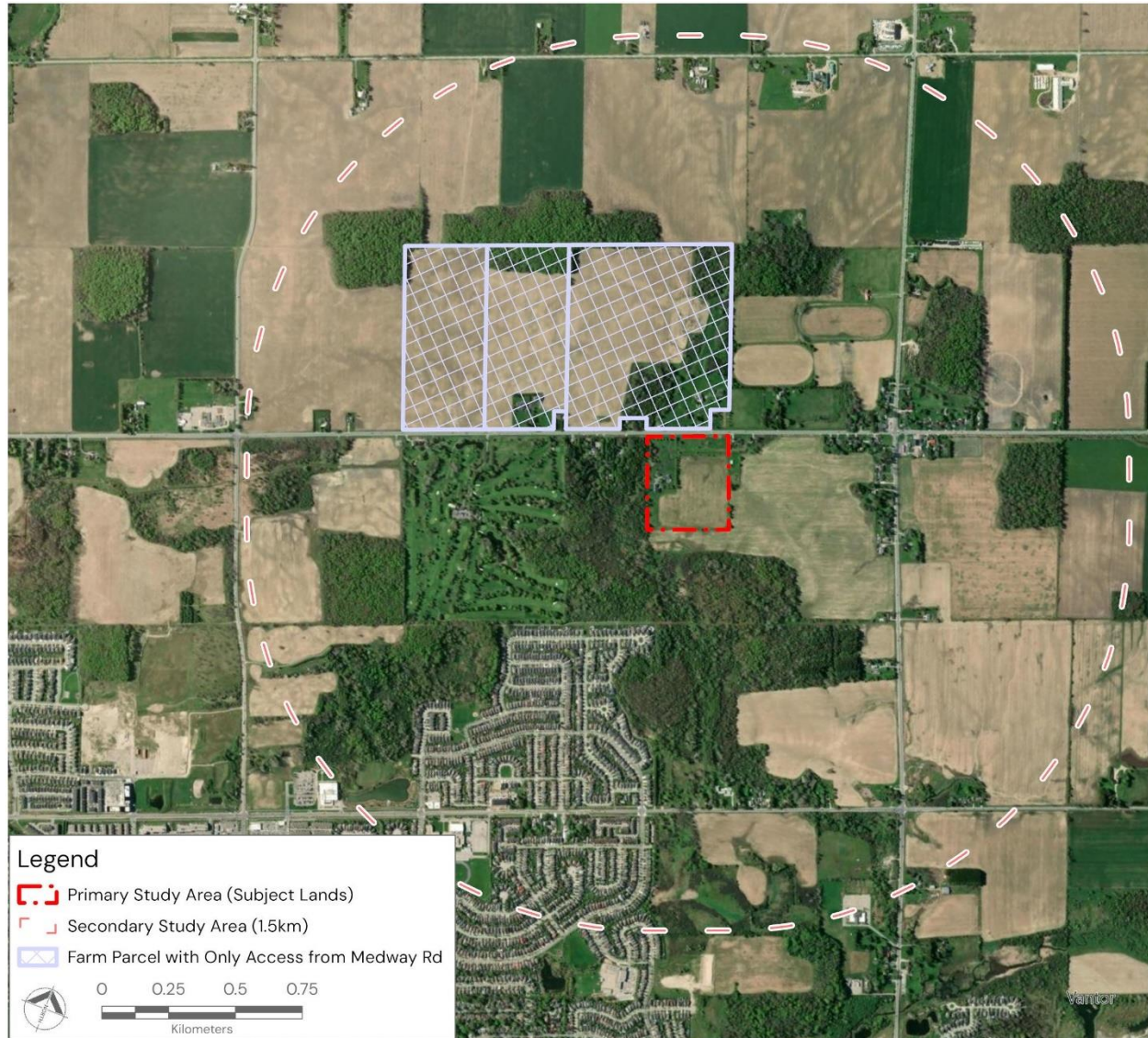
### Traffic and Transportation Impacts

The proposed Sports Facility generates episodic traffic peaks that have the potential to interact with ongoing agricultural operations in the surrounding area. Notably, there are three agricultural parcels which only have access to Medway Road between Adelaide St N and Highbury Ave N (**Figure 16**, below). All other agricultural parcels within the SSA, and beyond, have access to alternative transportation routes which could avoid any traffic generated by the sports facility.

During periods of heightened activity, particularly during scheduled events, additional traffic may interfere with the movement of farm machinery, especially during planting and harvest seasons when equipment movements are most frequent. Increased vehicle volumes may affect roadway safety for slow-moving agricultural vehicles along Medway Road and contribute to congestion at shared access points used by farm equipment. These conditions could, in turn, influence the timing and efficiency of

crop transportation and deliveries to agri-food businesses such as grain elevators and agricultural suppliers. Notably, these effects are operational in nature and are expected to occur primarily during event-related peak traffic periods rather than on a continuous basis.

**Figure 16 | Farm Parcels Affected by Traffic from Facility**



Source: Monteith Brown, 2026

## Cumulative Impacts

Although the project area is modest relative to the broader agricultural system, it contributes to cumulative impacts on the system.

The presence of a major recreational facility may introduce pressures toward more urban-style development patterns within a predominantly rural landscape, including demands for expanded services, infrastructure upgrades, and ancillary commercial uses. Such pressures can contribute to incremental

land-use change, increased land values, and heightened land-use conflicts, collectively challenging the maintenance of a stable, continuous agricultural system within the municipality.

The introduction of the proposed Sports Facility may increase the frequency of interaction between non-farm users and ongoing farm activities, heightening the potential for land-use conflicts. As recreational traffic and visitation increase, routine agricultural practices such as the movement of equipment, livestock management, and seasonal operations may face greater public scrutiny or misunderstanding. This shift can also lead to increased expectations for urban-quality services, including enhanced roadway standards, sidewalks, lighting, and other infrastructure improvements, which may be inconsistent with the functional needs and character of an agricultural landscape and could introduce operational constraints for farmers.

With the nearby Ballymote Settlement area, introducing the proposed Sports Facility may increase perceptions that agriculture is no longer the predominant land use in this area of the municipality, leading to further pressure from development on the surrounding agricultural parcels.

### **Summary of Impacts**

The most significant direct impact is the permanent loss of approximately 5.7 hectares of actively cultivated farmland, including a portion of higher-quality agricultural soils, along with the long-term loss of agricultural capability due to soil disturbance, compaction, and changes to drainage. Indirect impacts may affect adjacent farms through interactions with event-related traffic, potential changes to surface and subsurface drainage, effects of facility lighting and shadows on crop production, and increased constraints on normal farm practices such as pesticide application. While Minimum Distance Separation requirements are met and the project does not impose additional limitations on nearby livestock operations, the facility may contribute to broader, cumulative pressures on the agricultural system, including increased land-use conflicts, rising land values, expectations for urban-style services, and perceptions of a shift away from agriculture as the predominant land use. Collectively, these impacts are localized and operational in nature and can be addressed through adequate mitigation measures.

### **4.4 Measures to Address Potential Impacts**

A range of mitigation strategies can be implemented to reduce and manage the potential agricultural impacts associated with the proposed sports facility and to promote long-term land-use compatibility.

To minimize irreversible loss of agricultural capability, site design should prioritize the efficient use of land within the PSA, limiting the footprint of buildings, parking, and hard surfaces where feasible. Topsoil should be stripped, conserved, and reused onsite or made available for agricultural reuse elsewhere to preserve soil resources. Construction staging and equipment movement should be managed to minimize unnecessary soil compaction beyond the development footprint. Where possible, restoration plans should be incorporated to maintain the long-term potential for partial agricultural or compatible open-space use.

Stormwater management systems should be designed to maintain pre-development drainage patterns and protect downstream agricultural lands. This includes controlled discharge rates, erosion protection measures, and coordination with existing municipal drains. Regular maintenance of drainage infrastructure should be secured through development agreements to prevent long-term impacts such as field saturation, reduced crop yields, or disruption to subsurface drainage systems on adjacent farms.

Appropriate setbacks and vegetated buffers should be established along the edges of the site adjacent to agricultural lands. Buffers can help reduce potential impacts related to lighting, noise, dust, and visual intrusion while clearly delineating agricultural and non-agricultural uses. Lighting design should incorporate full cutoff fixtures, directional controls, and curfews where appropriate to minimize skyglow, light spill, and potential effects on crop growth.

Traffic management measures should be incorporated to reduce conflicts between event-related traffic and farm vehicle movements. These may include signage warning motorists of slow-moving vehicles, event traffic management plans that avoid peak planting and harvest periods where feasible, and access management strategies to reduce congestion at shared driveways. Ongoing coordination with affected farm operators should be encouraged to address temporary operational concerns during peak agricultural seasons.

To reduce indirect pressures on agricultural practices, education and awareness measures should be implemented to inform facility users about the presence and importance of surrounding farm operations. Signage or communication materials can reinforce the normalcy of farming activities such as noise, odours, and slow-moving vehicles.

At a broader scale, mitigation of cumulative impacts should be addressed through conformity with existing agricultural protection policies and settlement boundaries, ensuring the sports facility does not act as a catalyst for further rural land-use fragmentation. Any future development proposals in the area should be evaluated collectively to ensure that incremental change does not undermine the viability of the agricultural system. Maintaining clear policy direction that agriculture remains the predominant land use in the surrounding area will help manage land value pressures, development expectations, and long-term perceptions of agricultural security.

## 4.5 Recommendations and Conclusions

The direct loss of 3.9 hectares of CLI class 2 soil is unavoidable in constructing the proposed Sports Facility, however following the recommendations, below - particularly the development setbacks - minimizes this impact, ensuring the amount of land removed is the least possible. In order to implement the mitigation measures outlined in the above section, the following recommendations have been formulated, which will ensure any negative impact generated by the proposed sports facility is mitigated. **If the below recommendations are followed, the impact on the agricultural system generated by the proposed development will be minimized and mitigated.**

- Create a thorough development agreement at site plan stage which outlines that construction staging will be located entirely on-site, with appropriate buffers from adjacent agricultural operations. The development agreement should also describe drainage works, outlining who is responsible for upgrades at specific locations detailed in the agreement. The development agreement will further implement any recommendations to come out of the other detailed technical studies (Servicing Study, DAR, TIS) completed during the Site Plan stage, to ensure there are no impacts on the surrounding agricultural operations.
- Ensure continued communication with local farmers. Particularly regarding the operations of major events at the facility. Ensure programming at the sports facility avoids early mornings during planting and harvesting season to ensure traffic doesn't interfere with agricultural operations.
- Enforce appropriate development setbacks within the proposed zoning by-law amendment to ensure the built form of the proposed Sports Facility and associated construction does not affect the adjacent farmland.
- A shadow study and lighting plan should be prepared during the site plan stage to ensure it does not affect the adjacent croplands. Lighting should be directed to the internal layout of the sports facility, rather than extending outward to the adjacent lands.

# Planning Framework & Analysis

## 5.0 Planning Framework & Analysis

The following section provides an overview and analysis of the existing planning framework, identify the key policies and by-laws that relate to the subject lands, and discuss the Official Plan and Zoning By-law Amendments required to permit the proposed development.

### 5.1 Provincial Planning Statement

The Provincial Planning Statement 2024 (“PPS”) came into effect on October 20, 2024, and applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after that date. The PPS is intended “to be read in its entirety,” with decision-makers balancing a range of policy directives when deciding whether a planning proposal is consistent with the PPS rather than prioritizing one set of policies over another (PPS 1.).

The subject lands are within a *rural area*, as defined by the PPS, which include a system of lands including prime agricultural areas and natural heritage features (PPS 8.). The PPS states that healthy, integrated and viable rural areas should be supported by promoting the diversification of the economic base, providing opportunities for sustainable and diversified tourism, conserving biodiversity and ecological benefits, and providing opportunities for economic activities in prime agricultural areas (PPS 2.5.1). The proposed OPA and ZBA to permit a sports facility on the subject lands builds on the already established recreation (golf course) use immediately west of the subject lands and provides a new and enhanced focal point in the community for economic opportunity diversifying the current economic base, providing new tourism opportunity and remaining sensitive to the natural heritage features on and adjacent to the subject lands.

As the subject lands are in an area where prime agricultural lands predominate, the PPS considers them a *prime agricultural area* (PPS 8.). The PPS states that healthy, integrated and viable rural areas, which include prime agricultural areas, should be supported by building upon rural character, promoting diversification of the economic base and providing opportunities for economic activities in accordance with policy 4.3 (PPS 2.5.1.). Further, the PPS allows planning authorities to permit non-agricultural uses in prime agricultural areas for limited non-residential use, if the following are demonstrated (PPS 4.3.5.1b):

1. *the land does not comprise a specialty crop area;*
2. *the proposed use complies with the minimum distance separation formulae;*
3. *there is an identified need within the planning horizon identified in the official plan as provided for in policy 2.1.3 for additional land to accommodate the proposed use; and*
4. *alternative locations have been evaluated, and*
  - i. *there are no reasonable alternative locations which avoid prime agricultural areas; and*
  - ii. *there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.*

In addition, any impacts from a new non-agricultural land use on the agricultural system are to be avoided, and where avoidance is not possible, minimized and mitigated through an AIA (PPS 4.3.5.2). An AIA has been prepared in accordance with provincial guidelines and is discussed further in **4.0 Agricultural Impact Assessment** (“AIA”). In summary, the AIA identified that the land does not comprise a specialty crop area, the use complies with the minimum distance separation formulae, and alternative locations which avoid

or are on lower priority farmland in north Middlesex Centre have been evaluated. Criteria # 3, identifying the need for the use, is discussed below.

### **Identified Need for the Use**

In regard to the Need for the use, the Municipality of Middlesex Centre completed a Community Services Master Plan (“**MCCSMP**”), which was adopted on November 2, 2022. The MCCSMP works on a planning horizon from the year 2023 to 2027 and provides recommendations for parks and recreation, with an emphasis on ensuring inclusion and access to recreation for everyone. The MCCSMP identifies that Middlesex Centre was created out of three former townships, and as a result the amenities found in each former township look very different, and that there are gaps in the parks system that need to be addressed (MCCSMP pg. 19).

The MCCSMP recommends that the municipality consider new pickleball and tennis courts due to the rising popularity of these sports. Specifically, the north end of the municipality is targeted for these facilities. The MCCSMP also notes that the Ilderton Arena and Curling club is nearing the end of its lifecycle, and as such a replacement should be constructed as a community hub with several recreation services (MCCSMP pg. 20). The proposed sports facility will feature soccer fields, tennis, pickleball and basketball courts as well as other recreational facilities to alleviate the pressure on the municipality to locate these facilities, offering recreational opportunities which would decrease the demand, taking pressure off the municipality for these additional services.

The MCCSMP also provides a recommendation to increase collaborative efforts, including with the private sector, to support and nurture a vibrant recreation system (MCCSMP pg. 22). The MCCSMP states that over years of public consultation, dating back to the preparation of the previous 2012 Community Services Master Plan, residents indicated the desire to have a municipal pool constructed somewhere in Middlesex Centre. However, within the 2017 Ilderton Indoor Facility Needs Study, a population of 40,000 is generally the level required to financially support the construction of an indoor pool. As the Municipality is only projected to reach a population of 26,700 by 2031, a cost-benefit analysis was recommended to be conducted to understand the financial implications of constructing an indoor facility (MCCSMP pg. 23). As the proposed sports facility is a private venture, it would provide residents with the recreational opportunities they are requesting, without the financial burden on the municipality, or residents’ taxes.

While the proposed sports facility is located in Middlesex Centre, the subject lands are on the boundary of the City of London, which is currently rapidly developing towards the northern municipal boundary. Looking at the northern end of the City of London, a Parks and Recreation Master Plan (“**LPRMP**”) was completed by Montieth Brown Planning Consultants for the City, which was adopted June 25, 2019 identifying strong support for a future community centre in northwest London. In development of the LPRMP, community consultation was completed, with major comments identifying this desired community centre, with large gymnasiums to support a variety of sports such as pickleball (LPRMP pg. 25).

Analyzing indoor recreation spaces, the LPRMP identified a gap in community centre distribution in Northwest London and that due to population growth, the City should consider developing a neighbourhood community centre in North London (LPRMP pg. 58). The proposed private sports facility would help to fill existing gaps identified and alleviate the urgency and breadth of services

that any new facility in North London would require to respond to the recreational demand of the growing population in that area. The LPRMP provided a recommendation to construct the neighbourhood facility in North London within the time horizon of 2024-2029.

The PPS further states that planning authorities may only exclude land from prime agricultural areas for expansions of settlement areas (PPS 4.3.4). The proposed OPA and ZBA will not remove land from a prime agricultural area but permit a non-agricultural use within it consistent with PPS 4.3.5 as discussed above.

The PPS provides direction for development and site alteration adjacent to natural heritage features, stating that development shall not be permitted unless the ecological function has been evaluated and it has been demonstrated that there is no negative impact on the natural feature or its ecological function (PPS 4.1.8). Specifically, a Provincially Significant Wetland has been identified on the northwest corner of the subject lands, with further wetlands extending along the frontage of the property, north of the West Stoney Creek Drain which traverses the subject lands. The proponent has retained Beacon Environmental to inventory the subject lands and prepare preliminary review and assessment to establish to identify ecological features on the, determine development constraints associated with the wetland, assess impacts of the proposed development on the natural heritage system and identify mitigation measures to avoid or minimize impacts.

In consultation with Beacon, buffers are proposed during this Official Plan and Zoning By-law Amendment which would serve to protect the wetland features on the subject lands. Further refinement to the location of site alterations will occur during the Site Plan Stage, where further evaluation of the effects of the development on the wetland feature will be evaluated. To ensure consistency with PPS, a holding provision is proposed to be placed on the subject lands that will require the development specific DAR to be completed, confirming the preliminary conclusions that no negative impact on the natural features will result from the proposal prior to the removal of the holding.

PPS provides guidance on sensitive surface water features and requires that development shall be restricted near a feature, and that its hydrologic functions be protected, improved or restored (PPS 4.2.2). The holding provision proposed to be placed on the subject lands will also ensure that no development or site alteration can occur until the impact on the wetland feature and creek on the property have been confirmed.

Where municipal, or private communal sewage and water services are not available, planned or feasible, individual on-site services may be used so long as the site conditions are suitable for the long-term provision of such, with no negative impacts (PPS 3.6.4). Additionally, planning for stormwater management shall be integrated with sewage and water, reduce increases in volumes and containment loads, minimize erosion and changes in water balance, mitigate risks to human health, maximize extent and function of pervious surfaces, promote best practices and align with municipal stormwater plans (PPS 3.6.8). The preliminary servicing report discussed in **3.3 Preliminary Servicing Report** outlines the proposed strategy for individual on-site sewage treatment and stormwater management, that will be suitable for the use with no negative impacts. While this report is preliminary, a more detailed strategy will be developed at site plan stage, and similar to the ecological requirements, a holding provision will be placed on the subject lands to ensure that development does not proceed until the acceptable servicing strategy is finalized, in accordance with appropriate regulations and Municipal and MECP approvals.

As stated in the PPS, deposits of mineral aggregate resources shall be identified where provincial information is available and such resources shall be protected for long-term use (PPS 4.5.1). In known deposits, development which would hinder the establishment of a new operation or access to the

resource shall only be permitted if the resource use would not be feasible, the proposed land use serves a greater long-term public interest, and issues of public health, public safety and environmental impact are addressed (PPS 4.5.2.5). The proposed sports facility would provide a benefit of long-term public interest and impose less land use compatibility issues with the surrounding rural residential and recreational land uses than an aggregate extraction operation.

Planning authorities shall not permit development within areas of archaeological potential, unless any significant archaeological resources have been conserved (PPS 4.6.2). It was not identified that the subject lands contain archaeological potential during the pre-application consultation stage of the development.

PPS 5.2.2 directs development to be located outside of hazardous areas impacted by flooding hazards. The preliminary flood modeling as discussed in **section 3.1 Flood Mapping** has delineated the flood hazard on the subject lands and illustrates that the proposed development is outside its limits. The flood modelling has further ensured safe access to the proposed use can be achieved, and further refinement to the modeling with new access points crossing the flood plain will be contemplated at Site Plan stage.

Considering the policies discussed above, along with the analysis provided, the proposed amendments to the Middlesex Centre Official Plan and Zoning By-law to permit the proposed sports facility on the subject lands with the imposed holding provisions are consistent with the PPS.

## 5.2 County of Middlesex Official Plan

Official Plan Amendment No. 3 (“**OPA 3**”) was approved on July 7, 2023 which revised the Middlesex County Official Plan (“MCOP”) to a planning horizon until the year 2046. OPA 3 further updated Natural Heritage policies to reflect updated mapping through the Middlesex Natural Heritage System Study (“MNHSS”) 2014, and updated policy on Non-agricultural uses within agricultural areas. A subsequent amendment, Amendment No. 4, was adopted by council, on January 13, 2026, however it is currently awaiting approval by the Ministry of Municipal Affairs and Housing. As such, the MCOP currently in-effect is the July 7, 2023 version approved through OPA 3. The Policies of Amendment No. 4 will also be reviewed separately, at the end of this section to also ensure conformity with the Council endorsed Official Plan direction.

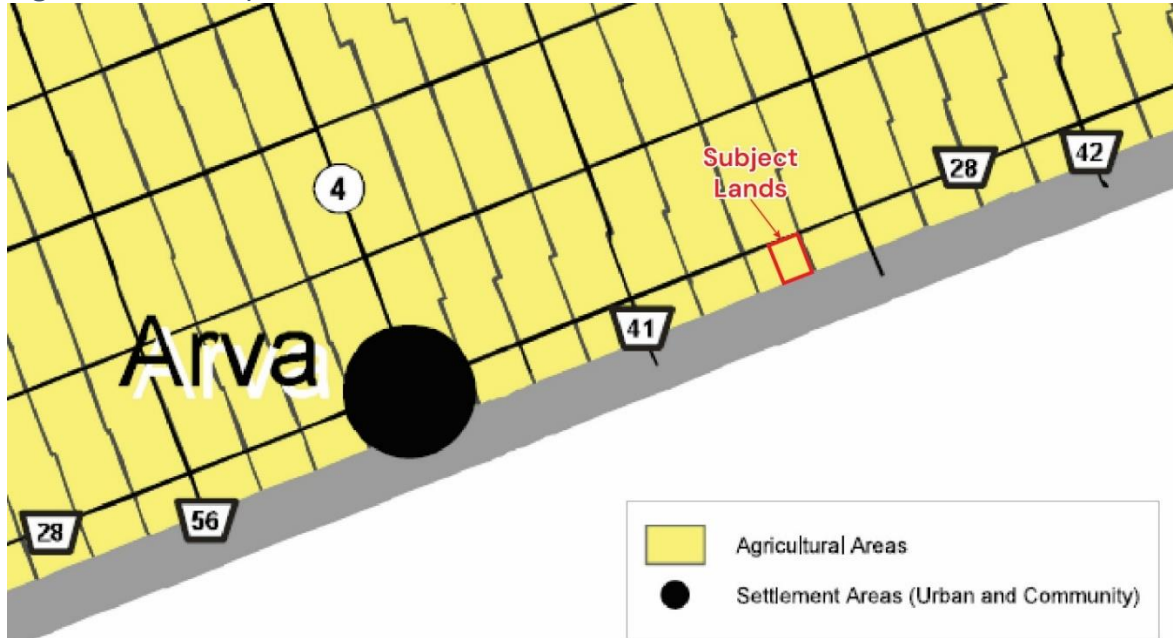
Middlesex County developed a strategic plan which provides objectives as they pertain to land use planning and are outlined in the MCOP and includes “*Strengthening our Economy*” (MCOP 1.2). Permitting a sports facility through the proposed OPA and ZBA will provide economic benefit to the County, while providing a land need that is missing in the north end of the community and sought after in the broader geographical region.

The basis of the entire MCOP is to take an ecological systems approach, enabling development to proceed with an environmentally sustainable basis (MCOP 2.1). The preliminary environmental work completed and the proposed holding provisions in the zoning on the subject lands ensures the development will respect buffers to the environmentally sensitive areas on and adjacent to the subject lands, and the planning instruments proposed will enable the development to proceed in an environmentally sustainable manner.

The Subject lands are designated as an *Agricultural Area* on Schedule A – Land Use of the MCOP with frontage along an *Arterial Road – County* as illustrated on Schedule B – Transportation. The pond in the northwest corner of the subject lands is identified in the *Natural Heritage System* as illustrated on Schedule C – Natural Heritage System and further confirmed on the County’s online GIS mapping MNHSS

2014 layer. Schedule D – Natural Hazard Areas delineates a northern portion of the subject lands as being within *Conservation Authority Regulation Limits*. Further, Schedule E illustrates the subject lands as being in an *Aggregate Resource Area*.

**Figure 17 | Excerpt from Schedule A – Land Use, MCOP**



Source: County of Middlesex Official Plan

The MCOP provides general policies within agricultural areas, allowing non-agricultural uses with a local Official Plan amendment (MCOP 2.2.2.2):

*Non-agricultural uses shall be encouraged to be located in identified Settlement Areas, and shall only be permitted in the Agricultural Area through an amendment to the local municipal Official Plan where it is demonstrated that the use will not:*

- a) *detract or adversely affect present and/or future agricultural operations;*
- b) *interfere with the viability of farm units;*
- c) *negatively impact the Natural Heritage System, or*
- d) *detract from the character of the agricultural community.*

*The local municipal Official Plan Amendment shall address:*

- *the land does not comprise a specialty crop area;*
- *the proposed use complies with the Minimum Distance Separation formulae;*
- *there is an identified need within the planning horizon provided for in Section 1.1.2 of the Provincial Policy Statement for additional land to accommodate the proposed use;*
- *alternative locations have been evaluated;*
- *Impacts from any new or expanding uses on surrounding agricultural operations and lands are mitigated to the extent feasible.*
- *there are no reasonable alternative locations which avoid prime agricultural areas; and*

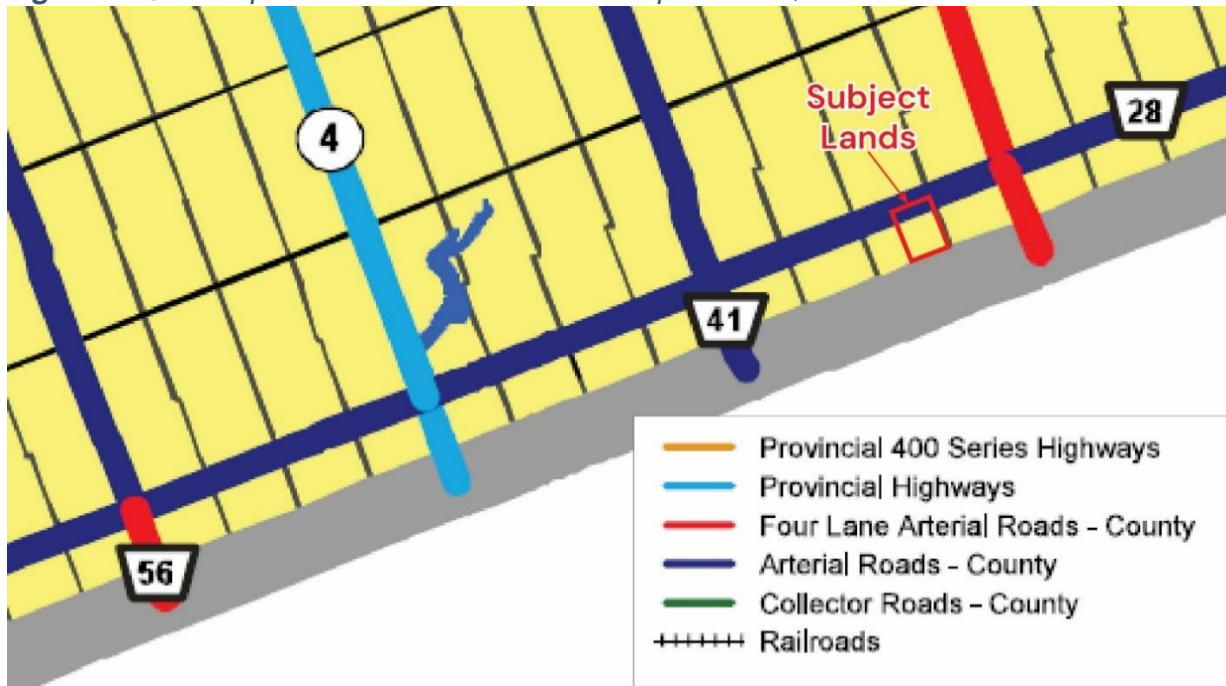
- *there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.”*

Section **4.0 Agricultural Impact Assessment (“AIA”)** of this report features an AIA which addresses specialty crop areas, Minimum Distance Separation, and alternative locations for the proposed use. The AIA further demonstrates that the proposed development does not detract or adversely affect present or future agricultural operations, interfere with the viability of farm units or detract from the character of the agricultural community. The need for the proposed land use has been identified and is discussed further in **Section 5.1 Provincial Planning Statement**, above. The preliminary environmental work conducted by Beacon Environmental identifies that the proposed development can respect preliminary buffers which will not negatively impact the Natural Heritage System. Beacon’s environmental work will continue evaluating the subject lands, leading to a fulsome Development Assessment Report (“**DAR**”), which will be completed with recommendations on mitigating negative impacts on the Natural Heritage Feature, for implementation at the Site Plan Stage. A holding provision is proposed to be placed on the subject lands to ensure the completion of a development specific DAR prior to site development.

Non-agricultural activities are stated to be closely scrutinized and directed to settlement areas unless the activity is agriculturally related or an on-farm diversified use (MCOP 2.3.9). The proposed sports facility requires a large amount of land, which is not currently available in the Municipalities settlement areas, as evaluated in the alternative location analysis of the AIA, in **Section 4.2 Alternative Locations**. As described in **Section 5.1 Provincial Planning Statement**, above, the need for a community recreation facility is in the northern end of the municipality, where the only settlements identified by the MCOP are Ilderton and Arva. Additional settlement areas are outlined within the Local Official Plan, none of which contain parcels of land large enough to accommodate the proposed use. The subject lands are located in proximity to the Ballymote Settlement area and are directly adjacent to an area designated for recreational use within the agricultural area.

*County roads* are prescribed setbacks of 38 metres from the centre line (MCOP 2.4.2.4) and access to County Roads shall require approval of the County Engineer (MCOP 2.4.2.5). Further details regarding access points and their layout will be refined at Site Plan Stage of the proposed development. A Traffic Impact Assessment will be undertaken to evaluate and provide recommendations regarding road improvements for the volume of traffic introduced by the use, if they are required.

Figure 18 | Excerpt from Schedule B – Transportation, MCOP



Source: County of Middlesex Official Plan

The Natural Heritage System illustrated on Schedule C has been derived from the Middlesex Natural Heritage Systems Study (MNHSS) 2014 and includes: woodlands, wetlands, thickets, meadows, connecting vegetation and open water (MCOP 2.2.1.3). When development is proposed within 120m of an identified feature, the conservation Authority and Province shall be consulted, and a Development Assessment Report is required to be submitted (MCOP 2.3.10). The proponent has acknowledged the requirement of a DAR and is undertaking work to ensure its completion. Recommended buffers and other mitigation measures to ensure the protection of the Natural Heritage system on the subject lands will be implemented at the Site Plan Control Stage. A holding provision is proposed within the proposed ZBA to ensure the completion of a detailed DAR, prior to any site alterations.

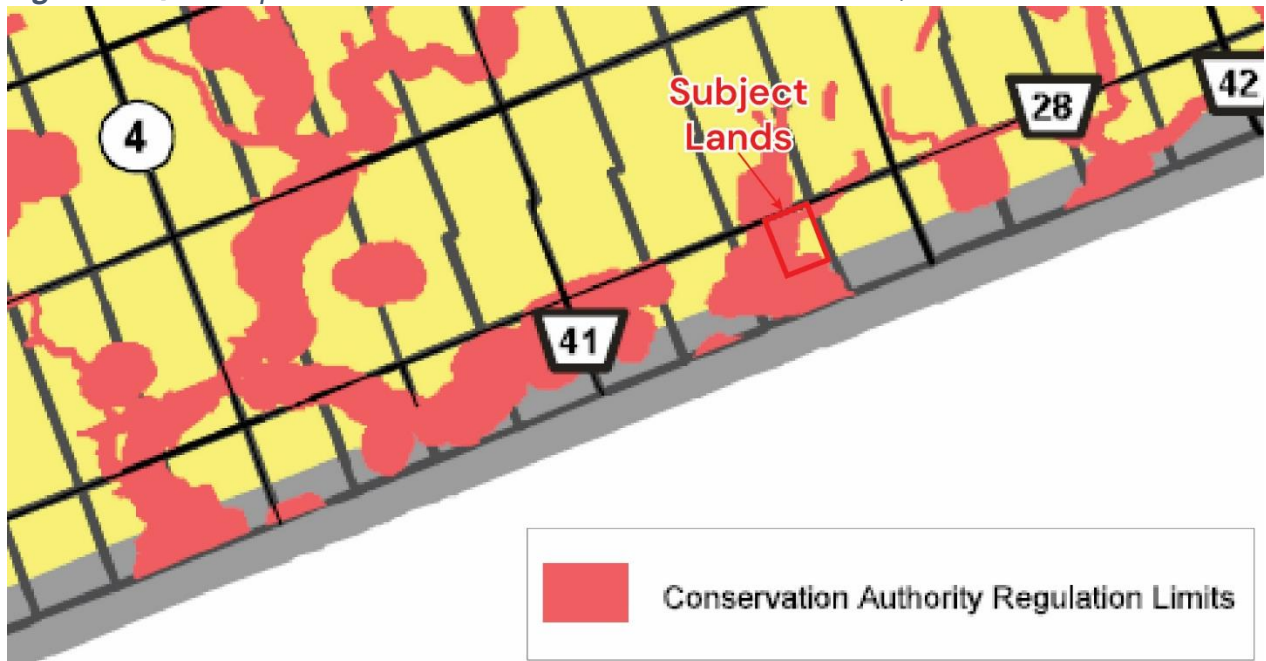
Figure 19 | Excerpt from Schedule C – Natural Heritage System, MCOP



Source: County of Middlesex Official Plan

Natural Hazard policies of the MCOP state that the general locations of Natural Hazards shown on Schedule D represent a compilation of engineered floodplain mapping, estimated floodplain mapping and erosion hazards and may be updated without an amendment to the Official Plan (MCOP 2.3.11). The Conservation Authority should be consulted for details regarding Schedule D mapping. A Flood Hazard Assessment was completed by Greck and Associates, in consultation with the UTRCA to refine the limit of flood hazard area on the subject lands. The assessment, which is discussed further in **section 3.1 Flood Mapping**, defined an existing conditions limit for the flood hazard. The proposed sports facility will be located outside of the Flood Hazard. The existing road access leading to the buildings and parking areas crosses the flood plain, but the flood modelling completed demonstrates that the existing driveway achieves safe access. Any grading modifications, including newly proposed crossing, proposed during the site plan stage will include updates to the flood assessment, to ensure the development remains outside of the hazard, and safe access is maintained. The proposed holding provision will ensure that updates to the modelling are completed prior to any site alterations.

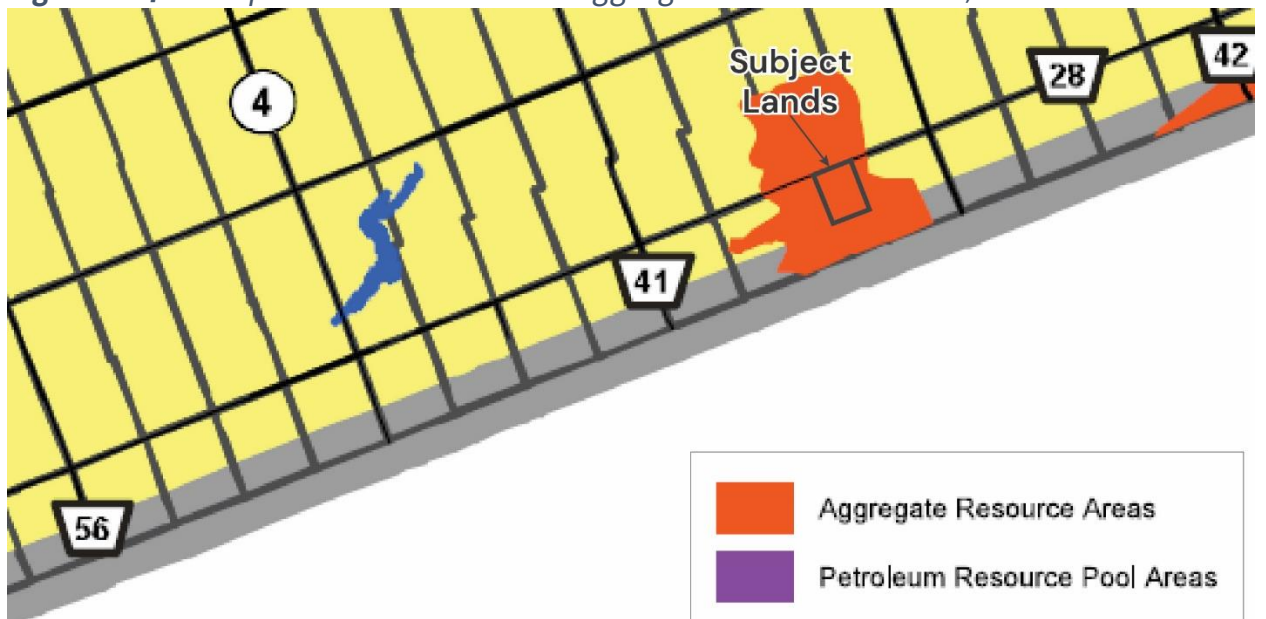
Figure 20 | Excerpt from Schedule D – Natural Hazard Areas, MCOP



Source: County of Middlesex Official Plan

The MCOP states that areas of mineral aggregate resources shall be identified in local official plans, and extraction may be permitted through site-specific official plan amendments, but they are to remain in the agricultural area designation (MCOP 3.3.7). The proposed Official Plan Amendment does not propose extracting resources, nor remove the subject lands from the aggregate resource areas designation. Due to the proximity of sensitive residential and recreational land uses, it is unlikely that the subject lands will be contemplated for resource extraction in the future.

Figure 21 | Excerpt from Schedule E – Aggregate Resource Areas, MCOP



Source: County of Middlesex Official Plan

Section 9.5.2 of the MCOP provides policies relating to cultural heritage, stating that an archaeological assessment will be required when development proposals have the potential to affect identified or known archaeological resources, or areas of archaeological potential. The subject lands have not been identified or known to contain archaeological resources, and it is unknown if they contain archaeological potential.

Considering the policies and analysis outlined above, the proposed Middlesex Centre Official Plan Amendment to remove the subject lands from an agricultural designation and into a recreational designation conforms with the in force and effect County of Middlesex Official Plan.

#### **Amendment No. 4**

Official Plan Amendment No. 4 (“**OPA4**”) was adopted by Middlesex County Council and is awaiting approval by the Ministry of Municipal Affairs and Housing. The Amendment updates the MCOP to consider population and employment projections for a time horizon of 2026-2056 (OPA4 1.6).

The agricultural policies have been amended through OPA4 to outline that non-agricultural uses shall only be permitted through a local municipal Official Plan Amendment, supported by an Agricultural Impact Assessment, in accordance with provincial guidelines (OPA4 2.2.2.2). An AIA has been completed within this report, in accordance with provincial guidelines and further discussed in section **4.0 Agricultural Impact Assessment (“AIA”)**.

Section 2.39 of the MCOP was amended to include new wording regarding agricultural area policies, stating the County is committed to taking a systems approach to Agriculture, with the policies of the plan in place to protect the Agricultural System (OPA4 2.3.9). The AIA prepared outlines the effects of the proposed sports facility on the Agricultural System from this viewpoint and recommends strategies to mitigate negative effects.

This Agricultural System Approach has also been introduced into the detailed land use policies of the MCOP. Notably, a paragraph has been added which states (OPA4 3.3.2):

*“Where the interface of agricultural uses and non-agricultural uses result in opportunities for potential conflict, land use compatibility shall be achieved through avoidance. Where avoidance is not possible, minimizing and mitigating adverse impacts on the agricultural system shall be required in accordance with the recommendations of an Agricultural Impact Assessment, or similar study, to the satisfaction of the County and local municipality. Where mitigation is required, the applicant shall incorporate applicable mitigation measures as part of the non-agricultural use being developed.”*

The mitigation measures proposed within the AIA prepared as part of this application will be implemented through the site plan stage of development.

The Natural Heritage Policies of the MCOP were amended to include the local municipality in consultations when a development is proposed within 120 metres of a natural Heritage Feature (OPA4 2.3.10). Middlesex Centre was consulted in pre-application discussions regarding the proposed Sports Facility and has remained in discussion throughout the EIS process.

Two important definitions were added to the MCOP through OPA4, within Appendix A: Glossary of Terms:

**AGRICULTURAL IMPACT ASSESSMENT** Means the evaluation of potential impacts of non-agricultural uses on the agricultural system. An assessment recommends ways to avoid or if avoidance is not possible, minimize and mitigate adverse impacts.

**AGRICULTURAL SYSTEM:** Means a system comprised of a group of inter-connected elements that collectively create a viable, thriving agri-food sector. It has two components:

a) An agricultural land base comprised of prime agricultural areas, including specialty crop areas. It may also include rural lands that help to create a continuous productive land base for agriculture; and

b) An agri-food network which includes agricultural operations, infrastructure, services, and assets important to the viability of the agri-food sector.

Considering the changes highlighted above, the proposed sports facility conforms to the policies introduced with Official Plan Amendment No. 4.

### 5.3 Middlesex Centre Official Plan

The Current in force and effect version of the Middlesex Centre Official Plan, or Local Official Plan (“LOP”) was originally approved by the County of Middlesex on Sept. 12, 2000. Several amendments were subsequently approved, with the most recent major amendment (“OPA 59”) adopted by council on May 18, 2022 and approved by the County of Middlesex on Sept. 26, 2023. OPA 59 is currently under appeal and before the Ontario Land Tribunal (“OLT”) but was partially approved by the OLT and subsequently Middlesex Centre Council on December 3, 2025. The partial approval is known as OPA 69 to implement updated policies on additional residential units.

The LOP designates the subject lands as being in an *Agriculture* designation within an Aggregate Resource Area on Schedule ‘A’ Land Use Plan. *Significant Woodlands* are illustrated along the property line, on the adject parcel to the west of the subject lands, on Schedule ‘B’ *Greenlands System*. *Hazard Lands (Steep Slopes/Fill Lines)* surrounding the *WaterCourses* (sic.) on the subject lands are illustrated on Schedule ‘C’ Natural Hazard Lands. Schedule ‘D’ Transportation & Utilities Plan illustrates Medway Road as a *County Road*, along the frontage of the subject lands.

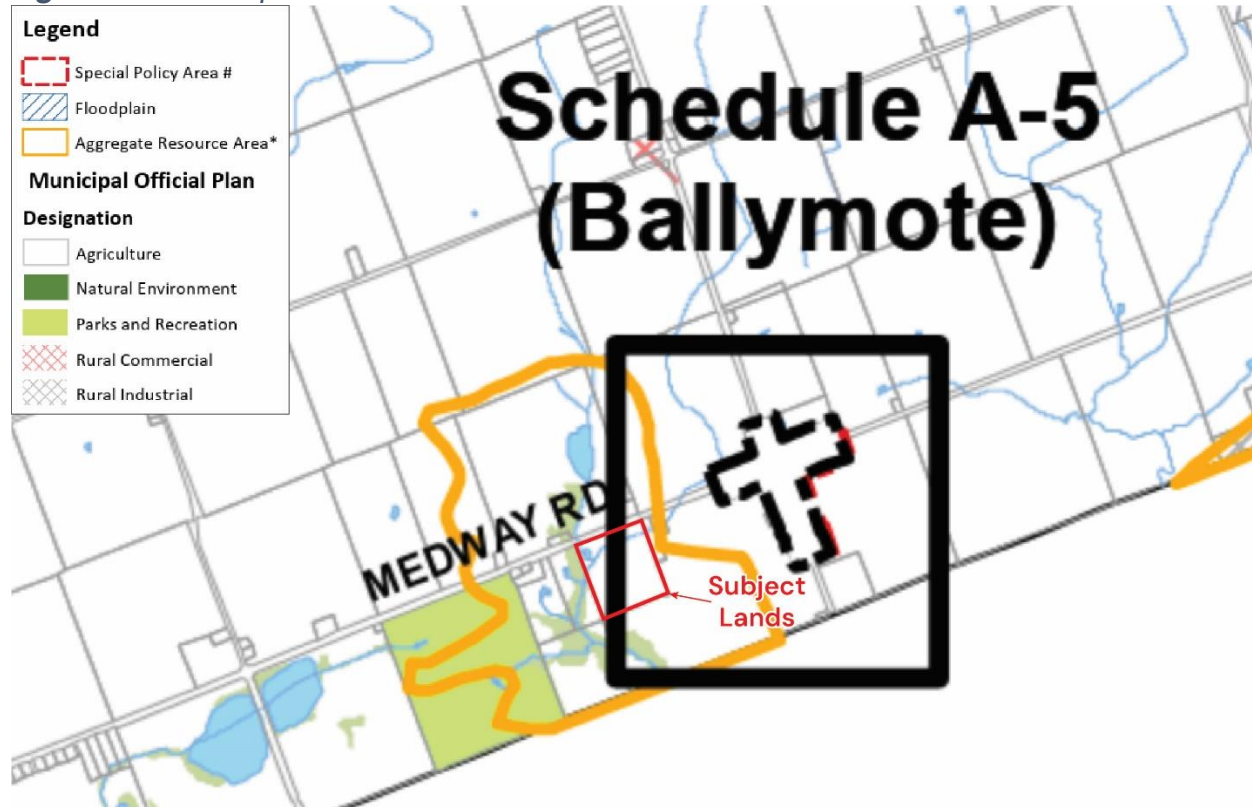
The LOP provides general principles which were provided to guide in the establishment of the Plan. Notably, they outline that the plan is to (LOP 1.7): f) manage growth and change in an appropriate manner, in appropriate locations; h) promote efficient land use patterns to minimize land consumption; j) provide adequate social, community and cultural services; p) reducing risk to public safety from natural hazards; and t) promote tourism as well as economic development with appropriate scaled commercial uses.

The proposed Sports Facility assists in providing a land use identified as being needed for the growing population of the area at an appropriate location, as outlined in **Section 5.1 Provincial Planning Statement**. Locating the facility adjacent to an longstanding existing large scale recreational use outside of the settlement area promotes an efficient land use pattern which minimizes land being centralized non-agricultural land uses. It further provides social, community and cultural benefit to the entirety of the municipality and promotes tourism and economic benefit within an appropriately scaled commercial use. The technical studies being completed will ensure the risks imposed by natural hazards are effectively and appropriately mitigated.

The general land use concept outlined in the LOP and further illustrated in the Plan’s various schedules is that lands outside of settlement areas, such as the subject lands, are designated for specific purposes

including “Agriculture, “Rural Commercial” and “Parks and Recreation” with Schedule A outlining site-specific policy areas (LOP 1.8). It is stated that it is not expected that new Rural Industrial or Rural Commercial designations outside settlement areas will be permitted. The proposed OPA does not introduce a new Rural Commercial designation and instead proposes an Agricultural Special Policy Area.

**Figure 22 | Excerpt from Schedule A – Land Use Plan, LOP**



Source: Middlesex Centre Official Plan

Specifically, within the Agricultural areas, goals are provided within the LOP, generally stating to preserve agriculture as the primary land use outside settlement areas, protecting agriculture from conflicting land uses, enhancing viability of farm operations, encourage retention and expansion of woodlots and encouraging good farm management and stewardship (LOP 2.1). As identified in **section 4.0 Agricultural Impact Assessment (“AIA”)**, the proposed sports facility considers alternative locations within the municipality, identifying that the subject lands represent an opportunity to accommodate the use with minimal impacts on the agricultural systems of the municipality. Mitigation measures are recommended to further reduce these impacts.

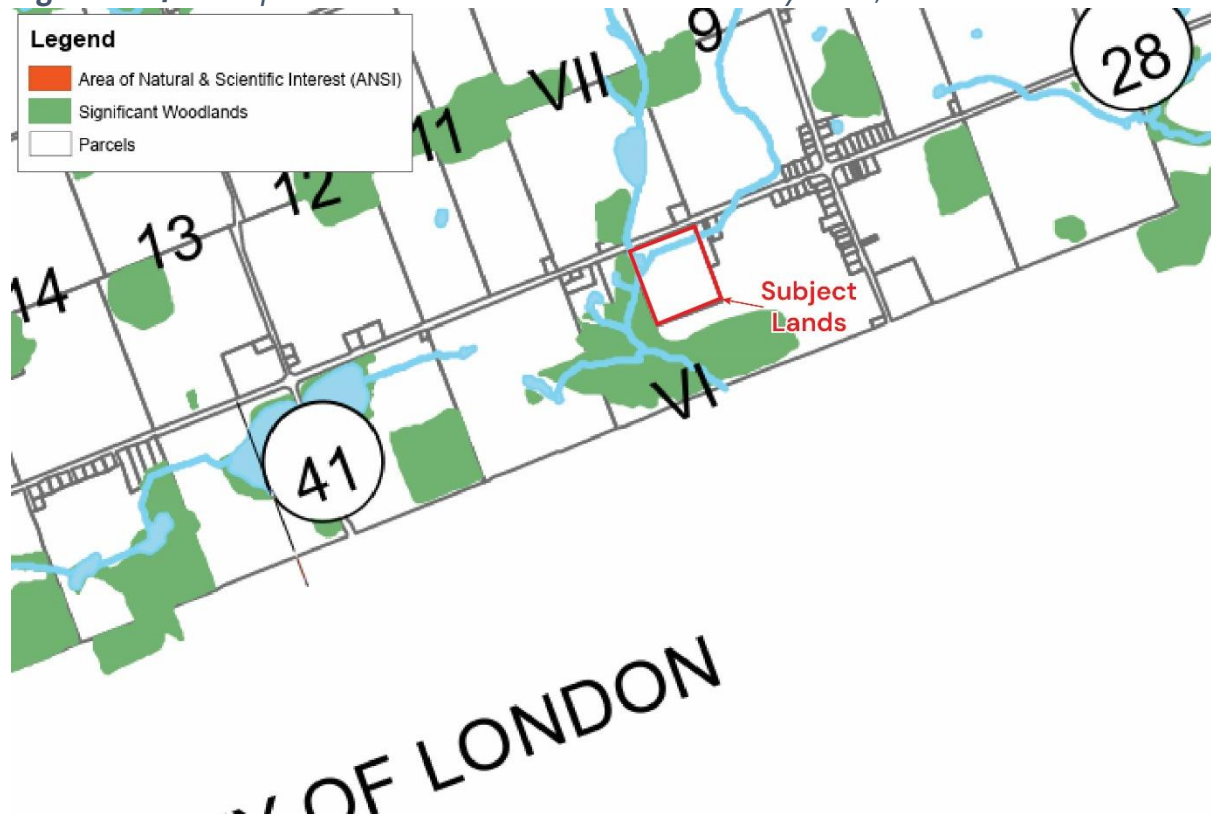
Within agricultural areas, non-agricultural urban uses require specific permission within the LOP to be permitted (LOP 2.2). Permitted uses in Agricultural areas, as listed in the LOP, include small scale public and private passive recreation areas, subject to site specific zoning (LOP 2.3). The proposed sports facility on the subject lands is not small in scale or passive, however, recreational uses may also be permitted subject to the other policies of section 2.0 of the LOP, with a determination that no negative impacts on nearby agricultural operations will result and the use is well removed from potential land use conflicts (LOP 2.4). Following the recommendations outlined in **section 4.0 Agricultural Impact Assessment (“AIA”)**, removes the development of the sports facility from potential land use conflicts with the surrounding agricultural operations, and the agricultural system as a whole.

For lands that are adjacent or within environmental features, such as those designated as a Greenland Feature on schedule B, development or site alterations shall be subject to a Development Assessment Report (LOP 3.4). Further, development or site alteration will be prohibited unless it can be shown that there will be minimal or no impacts on the form or function of the features. The preliminary work completed by Beacon Environmental has identified preliminary ecological buffers which will protect the environmental features on the subject lands. These preliminary buffers will be respected and refined through a more fulsome Development Assessment Report which will be completed during the Site Plan Approval Stage of the development. A holding provision is proposed to be placed on the subject lands, which will ensure the completion of the DAR prior to site alteration and site plan approval.

In co-operation with the local conservation authority (UTRCA), the LOP designates floodplain standards and relies on mapping provided by the Conservation Authority to define the boundaries of such areas (LOP 3.6). The proponent has submitted flood modeling to the UTRCA for their review and is working to ensure the proposed development will remain outside of the agreed upon flood hazard limit, with appropriate access points safely crossing the hazard.

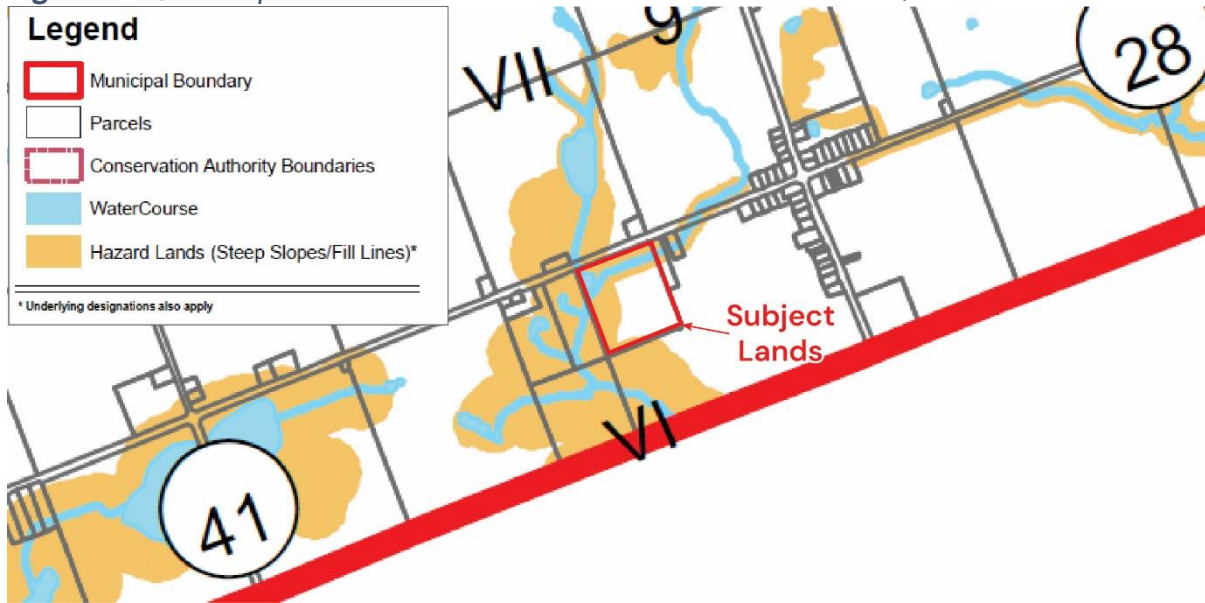
Lands identified as Hazard Lands on schedule C are related to either a slope hazard or fill line condition and will also be subject to the completion of a Development Assessment Report (LOP 3.7). The Final DAR will be completed at the detailed Site Plan stage to ensure the Hazard Lands identified on the subject lands are addressed appropriately.

**Figure 23 | Excerpt from Schedule B – Greenlands System, LOP**



Source: Middlesex Centre Official Plan

**Figure 24 | Excerpt from Schedule C – Natural Hazard Lands, LOP**



Source: Middlesex Centre Official Plan

The LOP policies on uses permitted within an area delineated as Aggregate Resource Area mirror the PPS policies stating that where extraction may be hindered or precluded, development may occur if the resource use would not be feasible, the proposed land use serves a greater long-term public interest, and issues of public health, public safety and environmental impact are addressed (LOP 4.3). Resource extraction is not a feasible or appropriate use of the lands on the subject lands due to the nearby sensitive land uses and the proposed sports facility delivers greater long-term public interest through sustained community, health, and economic benefits, while appropriately addressing public safety and minimizing environmental impacts through responsible design and mitigation measures. Further, benefits of the sports facility extend year-round and across generations as opposed to resource extraction, which is finite and time-limited.

General design policies are provided for the entire municipality, with it stated that physical design issues such as high-quality site plan design are considered important to achieving the Municipality's general vision (LOP 6.0). Specifically relating to Site Plan, a high quality of site design and architectural design is encouraged for new commercial development and development shall have regard for the Municipality's Urban Design Guidelines (LOP 6.1). The proposed sports facility will be well designed with high-quality architecture which considers the Municipality's Urban Design Guidelines to be further refined through the Site Plan stage of the development.

While the general intent of the proposed sports facility is to provide recreational opportunities for the Municipality, the Parks and Recreation designation as outlined in the official plan only permits the following uses (LOP 8.3):

- a) " Public and private parks and open space areas.
- b) Public and private recreation areas, including golf courses and campgrounds.
- c) Conservation areas, including uses identified in a conservation area master plan.
- d) Provincial parks, including uses identified in a parks master plan prepared by the Province.

- e) *The existing race track in the former Township of Delaware, known as the Delaware Speedway Park. This use and appropriate accessory uses will continue to be permitted; however, proposals to expand the land area associated with this use will be discouraged.”*

As this designation does not contemplate the inclusion of associated accommodations , restaurants or retail space as a permitted use, even in association with recreational use, a site-specific Official Plan designation will be sought through the proposed Official Plan Amendment. The LOP further states that recreational development on lands actively used for agricultural purposes will only be permitted through an amendment to the plan. The amendment should give consideration to potential impacts to the agricultural area and only be permitted where no adverse effect on the surrounding agricultural areas is expected (LOP 8.4a). The AIA completed within this report and discussed further in section **4.0 Agricultural Impact Assessment (“AIA”)** demonstrates that no adverse effects will occur on the surrounding agricultural systems.

The LOP provides General Economic Development Policies, with the endeavor to increase its tax base and job opportunities in a manner that improves the quality of life of existing and future Municipal residents, with further encouragement of community based commercial growth (LOP 9.2.1). The proposed sports facility will provide several new jobs to the surrounding area and increase the tax revenue of the Municipality. The recreational aspect of the development is a community based commercial operation which will serve to increase the quality of life for residents throughout the municipality.

The LOP encourages compatible, non-obtrusive tourism within both settlement and agricultural areas. Specifically, it states that the Municipality shall promote and encourage the establishment of additional tourism opportunities within both the settlement and agricultural areas (LOP 9.2.3). The proposed sports facility will feature overnight accommodations and restaurant which will serve to host people traveling for sporting events. The facility will be looked to as an attraction not only for municipal residents, but for the surrounding region, bringing the economic benefits that come with the tourism into the borders of Middlesex Centre.

With regard to servicing in non-settlement areas, the LOP generally speaks to the use of septic systems as the principal means of disposal, with consideration of alternative and improved technologies. Holding tanks are not permitted for new development, and municipal approval is required for any new septic tank or tile bed system. In processing development applications, both the Municipality and applicant shall have regard to the principals of storm water management, ensuring development does not significantly increase downstream flows above existing levels or degrade water quality (LOP 9.32). As outlined and further discussed in section **3.3 Preliminary Servicing Report**, during the site plan stage of the proposed development, a detailed Assimilative Capacity Study will be prepared to confirm the ability of the watercourse to accept effluent treated by a private wastewater treatment system. Additionally, on-site collection, treatment, infiltration, and controlled discharge of stormwater will be achieved, the design of which will be finalized during the site plan stage of development. A holding provision is proposed to ensure that an adequate servicing strategy is finalized prior to any site alterations.

The LOP provides criteria to be considered by the Municipality when evaluating an amendment to the plan, listing (LOP 10.1) with the responses to how the proposed Official Plan Amendment addresses the criteria below:

- a) *“Does the proposed amendment relate, and conform to the vision for the Municipality of Middlesex Centre?”*

Response: The proposed site-specific designation to permit the proposed sports facility conforms to the vision for Middlesex Centre by promoting an efficient land use pattern, by locating the proposed facility adjacent to an existing space expansive recreational use within an agricultural area. The proposed sports facility responds to a demonstrated need within the municipality, providing a social and community service while also introducing a tourist attraction aspect. Overall, the proposed site-specific official plan amendment to permit the facility relates and conforms to the Vision for the Municipality becoming a thriving, progressive and welcoming community.

*b) Is there a demonstrated need or justification for the proposed change?*

Response: As outlined in the MCCSMP and further discussed in section **5.1 Provincial Planning Statement**, there is an identified need for additional recreational facilities in the northern portion of Middlesex Centre.

*c) Is the amendment in keeping with Provincial and County policy?*

Response: As discussed in sections **5.1 Provincial Planning Statement** and **5.2 County of Middlesex Official Plan**, above, the proposed amendment is consistent with the Provincial Planning Statement and conforms to the County of Middlesex Official Plan.

*d) What are the effects of the proposed change on the demand for Municipal services, infrastructure and facilities?*

Response: The proposed Sports Facility will decrease the demand for municipal recreation services, by providing a privately funded facility for the community. The proposal will utilize private servicing, reducing reliance on municipal servicing infrastructure.

*e) Can the lands affected by the application be adequately serviced to accommodate the proposed development? Are improvements necessary to adequately service the lands in question?*

Response: The holding provision placed on the subject lands will ensure an adequate servicing strategy is thoroughly contemplated before site alterations are initiated. The servicing strategy will be held to Municipal, County and Ministry of Environment, Conservation and Parks standards.

*f) What impacts will the proposed development have on surrounding land uses, traffic systems, infrastructure and servicing, settlement or Municipal character, features or structures of cultural heritage importance, and natural environment features? Can negative impacts be mitigated or eliminated?"*

Response: As demonstrated in the AIA completed within the report, the proposed development will be able to mitigate any negative effects on the surrounding agricultural lands. The holding provision placed on the subject lands will ensure the completion of the required technical studies prior to site alteration. These studies specifically relate to the effects of the proposed development on the traffic system, municipal drain and natural environment, and will include recommendations to mitigate or eliminate any negative impacts.

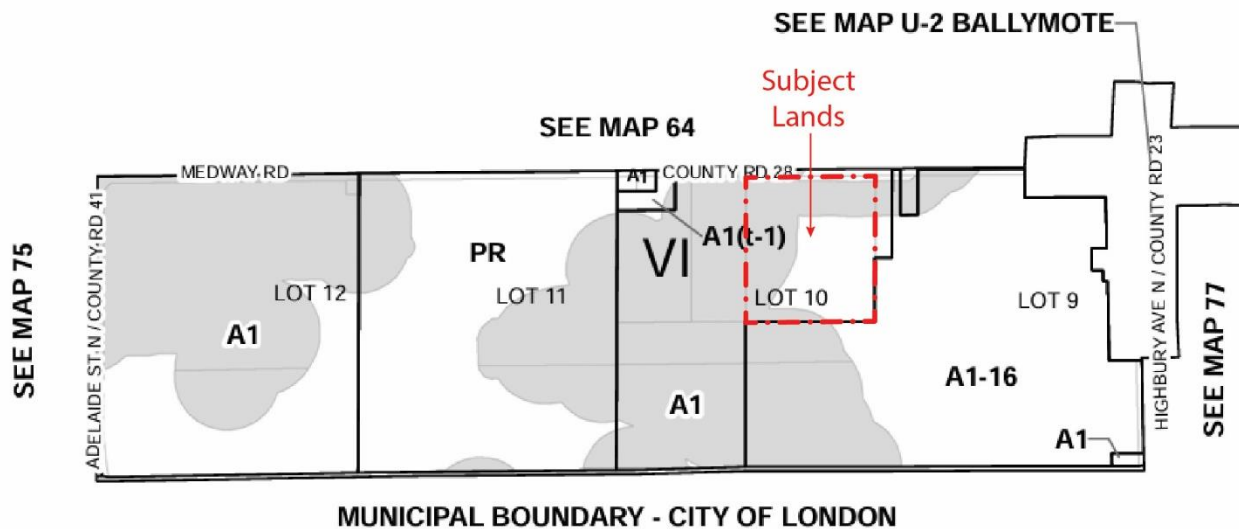
While non-agricultural uses are generally restricted in agricultural areas, recreational uses may be permitted through a site-specific Official Plan Amendment where no negative impacts on agriculture, natural features, or public safety are demonstrated. The proposed sports facility aligns with the LOP’s guiding principles by addressing an identified municipal need for recreational facilities, promoting tourism and economic development, and locating development in a manner that minimizes agricultural land loss. Supporting studies, including an Agricultural Impact Assessment and future Development Assessment Reports, demonstrate that potential impacts can be mitigated, while holding provisions will ensure environmental protection, servicing adequacy, and hazard mitigation prior to development. Overall, the proposal supports the municipality’s long-term vision, and provides social, community, and economic benefits without adversely affecting surrounding agricultural or natural systems. Considering this and the above policy analysis, the proposed Official Plan Amendment to permit a Sports Facility on the subject lands maintains the general intent and purpose of the of the Middlesex Centre Official Plan.

### 5.4 Middlesex Centre Zoning By-law

The Middlesex Centre Zoning By-law 2005-005 (“ZBL”) illustrates the subject lands in an Agriculture (A1) zone on key map 76 of Schedule A. Permitted uses in the A1 zone include the following (ZBL 5.1.1):

*accessory use, agricultural use, bed and breakfast establishment, conservation use, converted dwelling, dog kennel, forestry use, grain handling facility (existing legally on the date of the passing of this By-law), home occupation, riding school, single detached dwelling, portable asphalt plant, wayside pit.*

**Figure 25 | Excerpt from Schedule A – Key Map: 76**



Source: Middlesex Centre Zoning By-law

As the proposed uses are not permitted within the A1 zone, the proposed zoning by-law amendment will rezone the subject lands. In reviewing the zoning by-law for the uses proposed within the sports complex, the following definitions are important to consider:

**2.2 ACCESSORY**, when used to describe a use, building or structure means a use, building or a structure that is: (a) incidental, subordinate and exclusively devoted to a main use, building or

*structure; (b) located on the same lot as the main use, building or structure; and (c) unless specified otherwise in this By-law, not used for human habitation.*

*2.39 CLUB, PRIVATE means a building, or portion thereof, designed, used, or intended for use as a meeting place for the members of an organization, association, fraternal order, or similar group, not operated for profit and wherein athletic facilities, dining rooms, and beverage rooms may be provided. A private club does not include a body rub parlour or adult entertainment parlour.*

*2.40 COMMUNITY CENTRE means a building, or portion thereof, used for community activities, the control of which is vested in the Municipality, a local board, or trustees.*

*2.53 DAY NURSERY means a premises that receives more than five children who are not of common parentage, primarily for the purpose of providing temporary care or guidance, or both temporary care and guidance, for a continuous period not exceeding twenty-four hours, as otherwise defined under the Day Nurseries Act, R.S.O. 1990, c. D.2.*

*2.99 HOTEL means a building or structure providing accommodation for the travelling public, with or without accessory food, beverage or other services with each suite having access from the interior of the building which may also be accessible from the outside.*

*2.153 PARK, PRIVATE means a park not open to the public and may be operated for commercial gain.*

*2.180 PLACE OF ENTERTAINMENT means a lot, building or structure, or part thereof, where facilities are provided for entertainment or cultural activities and may include an auditorium, a motion picture or other theatre, billiard or pool room, bingo hall, bowling alley, amusement arcade, music hall or dance hall but shall not include an adult entertainment establishment or a body rub establishment or massage parlour.*

*2.181 PLACE OF RECREATION means a lot, building or structure, or part thereof where facilities are provided for recreation and may include an arena, gymnasium, fitness centre, ice or roller skating rink or curling rink but shall not include an adult entertainment establishment or a body rub establishment or massage parlour.*

A place of recreation is a permitted use within a Parks and Recreation (PR) zones (ZBL 23.1.1). As illustrated on the above zoning map, Llyndinshire golf course, located approximately 300 metres west of the subject lands is zoned Parks and Recreation (PR). Parks and Recreation zones further permit the following permitted uses:

*accessory use club, private conservation use forestry use golf course park, public or private place of recreation*

Considering the proposed day-nursery, overnight accommodation use, office, restaurant and retail space uses are proposed in association with the sports facility, and are not evaluated as stand-alone uses, a special provision will be placed to allow the uses within the facility. Considering some of the uses, such as the day-care facility and accommodation use may not always be *exclusively devoted* to the sports facility, they are proposed to be permitted in *association with*, not *accessory to* the place of recreation. This requires the use to be part of the recreation facility and does not permit the stand alone use.

As the existing dwelling on the subject lands is proposed to remain as an attractive dwelling space amongst the construction of the sports facility, the special provision will also allow the dwelling to continue, since a dwelling unit is not a permitted use within the base Parks and Recreation Zone.

**Table 1 – Parks and Recreation Zone (ZBL 23.1.2-6)**

Regulation	Required (PR zone)	Proposed (PR-XX)
Front Yard Setback (min)	38 m from centre line of County Road (section 4.19)	144 m
Side Yard Setback (min)	10.0 m	20 m
Rear Yard Setback (min)	7.5 m	21 m
Lot Coverage (max)	20 %	<b>*26.2 %*</b>
Height (max)	12.0 m	12.0 m

**\*Bold\*** denotes deviation from standard zoning provision, and requirement for special provision

In addition to regulations on the built form, the zoning by-law contains regulations for parking based on the use of a property (ZBL 4.28). The following table provides an overview of the required parking for the sports complex:

**Table 2 - Parking Requirements per use (ZBL 4.28)**

Use	Regulation	Approximate Gross Floor Area Proposed	Requirement
Day Nursery	1 space / 40 m <sup>2</sup>	1240 m <sup>2</sup>	31
Hotel, motel or tavern	1.25 spaces per room	48 rooms	60
Office, general	1 space / 40 m <sup>2</sup>	3,064 m <sup>2</sup>	77
Place of entertainment or recreation	1 space / 35 m <sup>2</sup>	46,745 m <sup>2</sup>	1336
Restaurant	1 space / 10 m <sup>2</sup>	1,596 m <sup>2</sup>	160
Store, retail	1 space / 25 m <sup>2</sup>	2,647 m <sup>2</sup>	106
Total:			1770
<b>Proposed:</b>			<b>*829*</b>

While the ZBL states that where a building accommodates more than one type of use, the total parking requirement shall be the sum of the requirements of the separate uses (ZBL 4.28c), many of the uses will be used in conjunction with each other and not operate as individual places of businesses. A total maximum of 829 parking spaces can be provided in the conceptual layout for the proposed facility. The holding provision will include a clause stating that parking will be further evaluated and may require minor variance at the site plan stage. In addition to the required parking spaces, a total of 1 plus 1% of the total required parking spaces shall be barrier-free, equating to a requirement of 19 spaces. The proposed layout will accommodate all required barrier free parking spaces.

A recommendation outlined in **section 4.0 Agricultural Impact Assessment (“AIA”)** stated that providing a minimum buffer from the agricultural uses be implemented within the zoning on the site to minimize and mitigate potential impacts from construction of the facility on the adjacent agricultural lands. A 20 metre setback from the adjacent agricultural use will be proposed to ensure soil-water flows are not adversely impacted during the excavation required for the foundation of the sports facility building. A 20 metre distance was chosen as a generous distance, considering many agricultural properties within the area feature a 10 metre distance from the edge of pavement along a right-of-way to the edge of cultivated

cropland. Providing a 20 metre distance will allow construction vehicles to maintain a 10 metre distance, while excavating a foundation for the building.

### **Proposed Holding Provision**

The Middlesex Centre Zoning By-law contains holding provisions which permit existing and public use in the interim, while no further buildings or structures shall be erected or altered until the holding provision is removed (ZBL 3.7). Specific text listing conditions to meet prior to removing the holding provision is listed for each specific holding zone enacted through the by-law.

As mentioned throughout this report, a holding provision is proposed to be added to the subject lands, in order to address the technical details of the proposed Sports Facility and associated uses. The intent of the proposed holding provision is to ensure that no negative impacts on the environmental and traffic systems are imposed by the proposed development, and to ensure a complete servicing strategy is formulated prior to any development.

# Proposed Planning Approvals >

## 6.0 Proposed Planning Approvals

### 6.1 Official Plan Amendment

An Agricultural Special Policy Area #XX is proposed on the subject lands to permit the proposed Sports Facility. The proposed special policy area will permit the uses sought after within the Sports Facility, and will include the text below:

*The land identified as Special Policy Area #XX, as shown on Schedule "A" to this Official Plan, shall be subject to the following policy:*

*Notwithstanding the Agriculture designation of the subject land and the policies contained in Section 2.0 of this Official Plan and the plan in its entirety, the following uses are permitted on the property municipally known as 15117 Medway Road:*

*A Sports Facility, including the following uses: Place of Recreation. In addition, the following uses will be permitted in association with a Sports Facility use: Place of Entertainment; Day Nursery; Hotel or Motel; Office, General; Restaurant; and Store, retail.*

### 6.2 Zoning By-law Amendment

To permit the proposed development plans for the subject lands, an amendment to the Middlesex Centre Zoning By-law is also required. The proposed zoning by-law amendment would **RE-ZONE** the subject lands **FROM** the existing *Agriculture (A1)* zone, as outlined on Key Map 76 of Schedule A, **TO** a Site Specific *Parks and Recreation (PR-XX)* zone with a *Holding Symbol (h-XX)*, with special provisions for parking, lot coverage and to recognize the existing dwelling on the subject lands.

Additionally, a holding provision is proposed to be placed on the subject lands to address the requirement for updated detailed technical studies to be completed prior to consideration for site plan approval and any site alterations.

The special provisions for the **NEW** PR-XX zone are listed below.

#### Specific Special Provisions – Proposed Text

23.3.XX (a) *DEFINED AREA*

*PR-XX as shown on Schedule A, Key Map 76*

(b) *PERMITTED USES*

*Existing Dwelling Unit  
All other uses permitted in the PR zone*

(c) *USES PERMITTED IN ASSOCIATION WITH A PLACE OF RECREATION*

*Place of Entertainment; Day Nursery; Hotel or Motel; Office, General; Restaurant; and Store, retail.*

(d) SETBACK FROM AGRICULTURAL LAND USE

*No building shall be located closer than 20m to adjacent agricultural zones to mitigate any impacts from construction, shadows, lighting and operational impacts.*

(e) MAXIMUM LOT COVERAGE

30 %

**Holding Provisions – Proposed Text**

3.7 (b) SPECIFIC PROVISIONS

(xxx) (h-XX)

*The precondition for the removal of the “(h-XX)” holding symbol shall be that the following technical studies be completed by a qualified professional in association with the site plan approval process for any proposed development on the lands to which the holding symbol applies and that any recommendations arising from the technical studies be incorporated into the Site Plan Agreement. The technical studies required to be completed at the site plan stage include: An updated detailed Development Assessment Report, an updated detailed Functional Servicing Report, and an updated detailed Traffic Impact Assessment, including parking assessment.*

# Conclusion

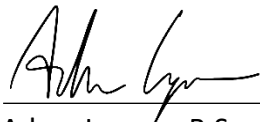


## 7.0 Conclusion

Based on the above analysis, the proposed Official Plan and Zoning By-law Amendments are consistent with the Provincial Planning Statement (2024), conform to the County of Middlesex Official Plan, maintains the general intent and purpose of the Middlesex Centre Official Plan, Middlesex Centre Zoning By-law, and represent good land-use planning.

Respectfully Submitted,

### MONTEITH BROWN PLANNING CONSULTANTS



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President, Principal Planner  
jmcguffin@mbpc.ca

## 7.1 Agricultural Impact Assessment Appendices



## MDS I

### General information

<b>Application date</b> Mar 26, 2026	<b>Municipal file number</b>	<b>Proposed application</b> New or expanding zone or designation for a commercial use outside of a settlement area
<b>Applicant contact information</b> Mostafa Heikal ON	<b>Location of subject lands</b> County of Middlesex Municipality of Middlesex Centre LONDON Concession 6 , Lot 10 Roll number: 393903404003300	

### Calculations

#### 15194 Medway Road - Barn 1

<b>Farm contact information</b> Unknown Unknown 15194 Medway Road Arva, ON N0M 1C0	<b>Location of existing livestock facility or anaerobic digester</b> County of Middlesex Municipality of Middlesex Centre LONDON Concession 7 , Lot 9 Roll number: 393903404002600	<b>Total lot size</b> 102 ac
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### Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Horses, Large-framed, mature; > 680 kg (including unweaned offspring)	10	14.3 NU	3250 ft <sup>2</sup>

**Setback summary**

Existing manure storage	V3. Solid, outside, no cover, >= 30% DM		
Design capacity	14.3 NU		
Potential design capacity	28.6 NU		
Factor A (odour potential)	0.7	Factor B (design capacity)	217.16
Factor D (manure type)	0.7	Factor E (encroaching land use)	2.2
<hr/>			
Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)			235 m (771 ft)
Actual distance from livestock barn			244 m (800 ft)
Storage base distance 'S' (minimum distance from manure storage)			235 m (771 ft)
Actual distance from manure storage			274 m (900 ft)

**15194 Medway Road - Barn 2**

<b>Farm contact information</b> ON	<b>Location of existing livestock facility or anaerobic digester</b> County of Middlesex Municipality of Middlesex Centre LONDON Concession 7 , Lot 9 Roll number: 393903404002600	<b>Total lot size</b> 102 ac
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**Livestock/manure summary**

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Horses, Large-framed, mature; > 680 kg (including unweaned offspring)	15	21.4 NU	4875 ft <sup>2</sup>

**Confirm Livestock/Manure Information (15194 Medway Road - Barn 2)**

The livestock/manure information has not been confirmed with the property owner and/or farm operator.

### Setback summary

Existing manure storage	V1. Solid, inside, bedded pack		
Design capacity	21.4 NU		
Potential design capacity	42.9 NU		
Factor A (odour potential)	0.7	Factor B (design capacity)	245.72
Factor D (manure type)	0.7	Factor E (encroaching land use)	2.2
<hr/>			
Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)			265 m (869 ft)
Actual distance from livestock barn			732 m (2400 ft)
Storage base distance 'S' (minimum distance from manure storage)			No existing manure storage
Actual distance from manure storage			NA

### Preparer signoff & disclaimer

#### Preparer contact information

Adam Lagrou  
Monteith Brown Planning Consultants  
ON

#### Signature of preparer

Adam Lagrou , Planner

Date (Month-Day-Year)

#### Note to the user

The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA) has developed this software program for distribution and use with the Minimum Distance Separation (MDS) Formulae as a public service to assist farmers, consultants, and the general public. This version of the software distributed by OMAFA will be considered to be the official version for purposes of calculating MDS. OMAFA is not responsible for errors due to inaccurate or incorrect data or information; mistakes in calculation; errors arising out of modification of the software, or errors arising out of incorrect inputting of data. All data and calculations should be verified before acting on them.

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For more information, please contact:

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