

Planning Justification Report

10608 Longwoods Road Delaware, Ontario

Derek and Alanna Fitzpatrick

September 2026



Contents

1.0	INTRODUCTION AND SUMMARY	2
2.0	SUBJECT LANDS AND CONTEXT	2
2.1	SITE LOCATION AND DESCRIPTION	2
2.2	SURROUNDING LAND USES	6
3.0	PROPOSED DEVELOPMENT	7
4.0	REQUIRED PLANNING APPROVALS.....	7
4.1	PROPOSED COUNTY OF MIDDLESEX OFFICIAL PLAN AMENDMENT	7
4.2	PROPOSED MIDDLESEX CENTRE OFFICIAL PLAN AMENDMENT	8
4.3	PROPOSED ZONING BY-LAW AMENDMENT.....	9
5.0	LAND USE PLANNING ANALYSIS.....	10
5.1	PLANNING ACT, RSO 1990	10
5.2	PROVINCIAL PLANNING STATEMENT, 2024.....	11
5.3	COUNTY OF MIDDLESEX OFFICIAL PLAN.....	13
5.4	MIDDLESEX CENTRE OFFICIAL PLAN	18
5.5	MIDDLESEX CENTRE ZONING BY-LAW	21
6.0	ADDITIONAL ANALYSIS	24
6.1	PUBLIC CONSULTATION STRATEGY	24
6.2	TECHNICAL STUDIES.....	24
6.2.1	<i>Traffic Impact Brief.....</i>	<i>24</i>
6.2.2	<i>Development Assessment Report.....</i>	<i>24</i>
7.0	AGRICULTURAL IMPACT ASSESSMENT	25
7.1	FIELD INVESTIGATION.....	25
7.2	CLI AGRICULTURAL LAND CLASSIFICATION	25
7.3	DRAINAGE	27
7.4	ASSESSMENT OF CONFORMITY WITH AGRICULTURAL POLICIES	28
7.5	ASSESSMENT OF ECONOMIC PROFILE OF THE MUNICIPALITY OF MIDDLESEX CENTRE	28
7.6	POTENTIAL IMPACT AND MITIGATION MEASURES.....	28
8.0	CONCLUSION	29

1.0 INTRODUCTION AND SUMMARY

Zelinka Priamo Ltd., on behalf of Derek and Alanna Fitzpatrick, is pleased to submit this Planning Justification Report for a property located on the northerly side of Longwoods Road, between Carriage Road and Brigham Road, known municipally as 10608 Longwoods Road, Delaware, and known legally as Part of Lots 5 and 6, Concession 2, in the Municipality of Middlesex Centre, County of Middlesex (“the subject lands”).

The purpose of this report is to support applications for an Official Plan Amendment to the County of Middlesex Official Plan, an Official Plan Amendment to the Middlesex Centre Official Plan, and a Zoning By-law Amendment to permit the establishment of a “Clinic” within a portion of the existing vacant commercial building located on the southerly portion of the subject lands.

The proposal represents the adaptive reuse of the existing vacant building to accommodate the (medical) “Clinic.” The existing building, entrance, parking area, and private servicing infrastructure provide an opportunity to establish the proposed use without the need for new construction or the unnecessary disturbance of agricultural lands or natural heritage features. The balance of the property will remain unchanged and continue to function in its existing condition.

The proposed “Clinic” will provide an important healthcare service to the surrounding community while making efficient use of an existing building that would otherwise remain vacant. Given the site's existing development, frontage along Longwoods Road, proximity to the Delaware Settlement Area, and the absence of any expansion to the existing development footprint, the proposal represents a logical and appropriate site-specific use. The requested planning approvals are intended to recognize these unique site circumstances and should not be viewed as establishing a broader precedent for permitting non-agricultural uses within the Agricultural designation.

This report will evaluate the proposed Official Plan Amendments (“OPA”) and Zoning By-Law Amendment (“ZBA”) applications, which seek to add a site-specific policy under the Agriculture land use policies in the County of Middlesex Official Plan (“County OP”), a site-specific policy under the Agricultural land use policies in the Middlesex Centre Official Plan (“Middlesex Centre OP”), and to apply a dual-zone to the subject lands to permit the proposed “Clinic” use, within the context of existing land use policies and regulations, including the 2024 Provincial Planning Statement, the County OP, the Middlesex Centre OP, and the Middlesex Centre Zoning By-law (“ZBL”).

2.0 SUBJECT LANDS AND CONTEXT

2.1 SITE LOCATION AND DESCRIPTION

The subject lands are irregular in shape with frontage along Longwoods Road (Figure 1). The subject lands have an area of approximately 17.0 hectares (42 acres) and a frontage of approximately 22.6 metres (74.1 feet). The subject lands are currently designated “Agricultural

Areas” under Schedule A and “Natural Heritage System” under Schedule C of the County OP, are currently designated “Agriculture” under Schedule ‘A’ and “Significant Woodlands” under Schedule ‘B’ of the Middlesex Centre OP and are currently zoned “Agricultural (A1)” under Schedule A: Key Map 87 in the ZBL. The lands are occupied by a currently vacant single-storey commercial building, which is positioned towards the southerly portion of the lands (near the Longwoods Road frontage) and a single detached dwelling to the north. A singular vehicular access is provided via Longwoods Road; leading to an existing parking area associated with the vacant building and continuing north to the single detached dwelling. The northerly portion of the subject lands primarily consists of vegetated areas.

On the subsequent pages, Figures 2–5 illustrate the subject lands and the surrounding lands, providing context for the site and its immediate surroundings.

Figure 1 – Subject Lands (outlined in red)

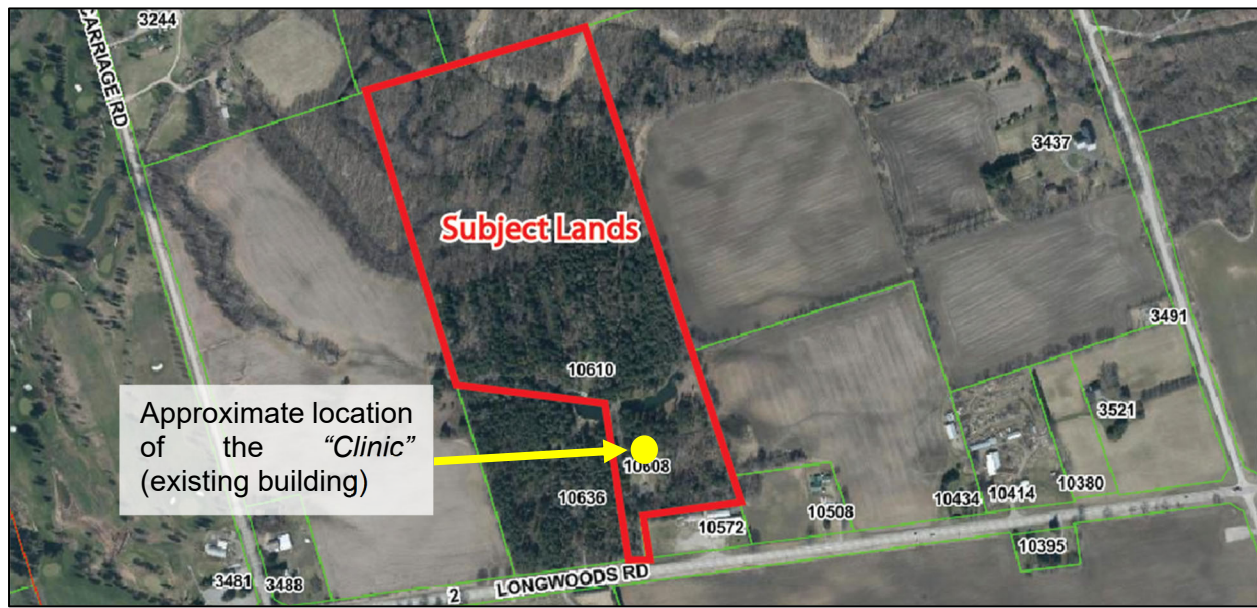


Figure 2 – View of vacant building where the proposed “Clinic” would be located



Figure 3 – View from driveway, looking north into the property

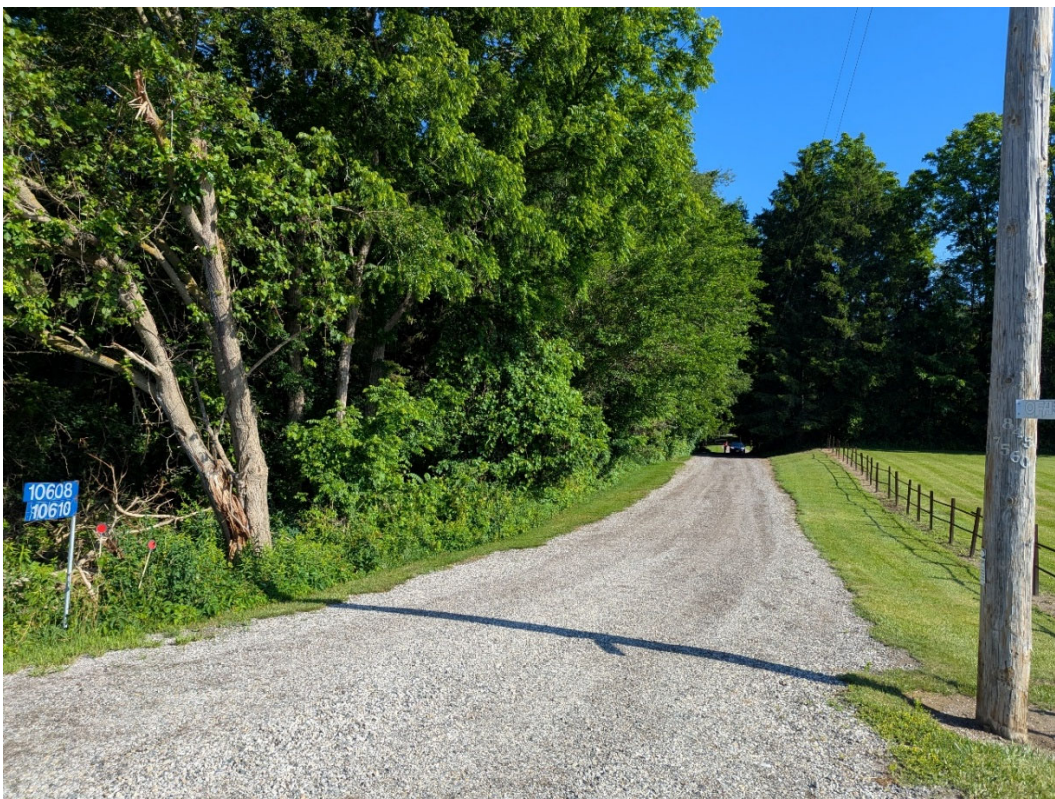


Figure 4 – View of surrounding land uses, looking east



Figure 5 – View of surrounding land uses, looking west



2.2 SURROUNDING LAND USES

Lands within 400m are predominantly characterized by agricultural uses, comprised of cultivated fields with associated farm dwellings and accessory buildings, rural residential lots and industrial uses fronting onto Longwoods Road.

Within 800m, agricultural remains the dominant land use. Commercial and industrial uses are also present, with a few notable features being Vandex Manufacturing, Delaware Sawmill, Proscap Horticultural and Twin Streams Golf Course. The community of Delaware is also located approximately 1,000m from the current subject lands. A portion of Dingman Creek traverses the property, and the surrounding area is characterized by extensive vegetation.

Figure 6 illustrates the surrounding context of the subject lands.

Figure 6 – The Subject Lands & Surrounding Context



3.0 PROPOSED DEVELOPMENT

The subject lands contain an existing vacant one-storey commercial building located on the southerly portion of the property near Longwoods Road. Most recently, the building was used for commercial purposes. A portion of the subject building (approximately 205m²) is proposed to accommodate a medical “Clinic.” Up to 3 employees will be employed in the “Clinic.”

The proposal represents the adaptive reuse of the existing vacant building and associated site infrastructure to accommodate the proposed “Clinic” with minimal site alterations. By utilizing an existing structure together with the private servicing infrastructure, the proposal negates the need for new construction or additional land disturbance while maintaining the surrounding agricultural lands and natural heritage features.

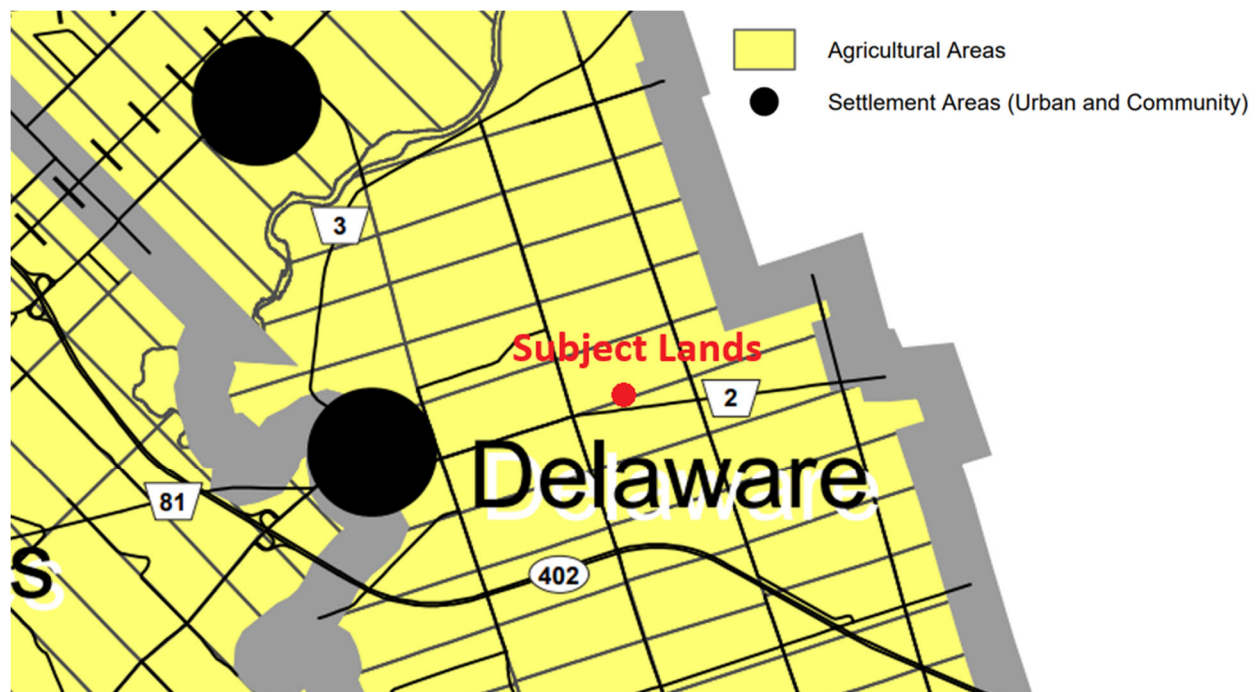
The proposed “Clinic” will utilize the existing access from Longwoods Road and the existing parking area adjacent to the vacant building. The existing parking area can accommodate approximately 17 parking spaces (including one barrier-free).

4.0 REQUIRED PLANNING APPROVALS

4.1 PROPOSED COUNTY OF MIDDLESEX OFFICIAL PLAN AMENDMENT

The County OP designates the subject lands as “Agricultural Areas” in Schedule ‘A’ (Figure 7).

Figure 7 – County of Middlesex Official Plan: Schedule ‘A’ – Land Use (excerpt)



The purpose of the Agricultural Areas land use designation is to protect and strengthen the

agricultural community, which is a major economic component within the County, while directing growth and development to existing settlement areas and designated hamlets (Section 3.3.1). Permitted uses within agricultural areas generally include agricultural and agricultural-related uses.

The proposed “Clinic” use is not currently listed as a permitted use under this policy framework. As such, an OPA is being submitted to implement a site-special policy on the subject lands to permit the proposed “Clinic.”

4.2 PROPOSED MIDDLESEX CENTRE OFFICIAL PLAN AMENDMENT

The subject lands are within the “Agriculture” land use designation of the Middlesex Centre OP (Figure 8), with a “Natural Heritage” overlay applying to most of the subject lands (Figure 9, shown on next page).

Figure 8 – Middlesex Centre Natural Heritage overlay (excerpt from Middlesex County interactive map)

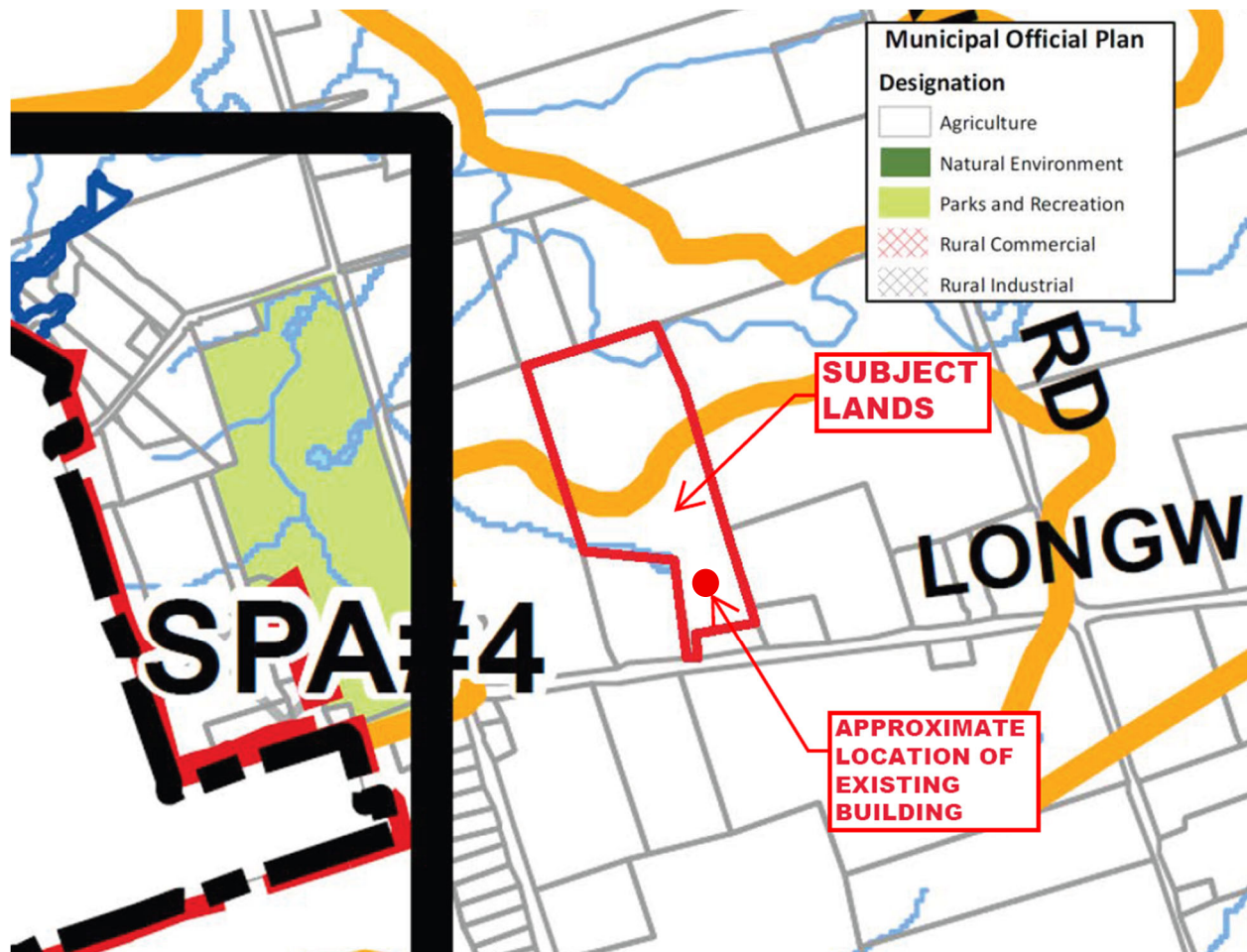


Figure 9 – Middlesex Centre Natural Heritage overlay (excerpt from Middlesex County interactive map)



According to Section 2.1 of the Middlesex Centre OP, the primary goals of the agriculture designation include the preservation of agriculture as the primary land use outside of settlement areas, and to encourage retention of the existing woodlots within the Municipality. Agricultural areas are intended to be used predominantly for agriculture and agriculture-related uses. Non-agricultural urban uses, including a “Clinic”, within agricultural areas is not supported (Section 2.5).

The purpose of the OPA is to redesignate the application lands and establish a site-special policy to permit a “Clinic” on the application lands.

4.3 PROPOSED ZONING BY-LAW AMENDMENT

The portion of the subject lands where the existing building proposed for a “Clinic” is zoned “Agricultural (A1)”. The proposed “Clinic” use is not listed as a permitted use in the A1 Zone.

As such, a ZBA is proposed to rezone the area surrounding the existing building from the current “Agricultural (A1)” Zone to a site-specific zoning of “Agricultural (A1-())” to permit the proposed “Clinic” use. The existing “Agricultural (A1)” is to remain on the northerly portion of the lands containing the existing dwelling and natural heritage features.

The proposed site-specific zoning limits are based on applying a 30.0m buffer from the existing water feature on the subject lands, as shown on the Proposed Zoning figure (Figure 10, shown on next page).

No other special zoning provisions are anticipated as part of the proposed development.

Figure 10 – Proposed Zoning (Excerpt from Conceptual Site Plan)



5.0 LAND USE PLANNING ANALYSIS

The following sections of this report provide an analysis of the proposed development with respect to the applicable policy and regulatory documents, including the Planning Act, 2024 Provincial Planning Statement, the County OP, Middlesex Centre OP and the ZBL.

5.1 PLANNING ACT, RSO 1990

When considering an OPA and ZBA applications, the Planning Act (“Act”) states that regard shall be had for the items in Section 2, which address matters of provincial interest, such as:

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;*
- (k) the adequate provision of employment opportunities;*
- (o) the protection of public health and safety.*

The proposal has regard for matters of provincial interest by providing an essential healthcare service, supporting local employment, protecting ecological features through the reuse of an existing building, and maintaining public health and safety.

Given the above, it is our professional opinion that the proposed development is consistent with Section 2 of the Planning Act.

5.2 PROVINCIAL PLANNING STATEMENT, 2024

The Provincial Planning Statement (“PPS”) is issued under Section 3 of the Act and “provides policy direction on matters of provincial interest related to land use planning and development.” In accordance with the Act, all decisions affecting land use planning matters shall be consistent with the policies contained in the PPS.

Table 1 provides a summary of the relevant PPS policies and a policy analysis detailing how the proposed development is consistent with the applicable PPS policies.

Table 1: 2024 PPS Policy Analysis

<i>Policy</i>	<i>Analysis/Response</i>
<u>Section 2.5.1.h</u> Healthy, integrated and viable rural areas should be supported by providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.	The proposed use will provide an essential healthcare service and economic contribution to the agricultural area and local economy.
<u>Section 2.6.3</u> Development shall be appropriate to the infrastructure which is planned or available, and avoid the need for the uneconomical expansion of this infrastructure.	It is anticipated that the existing infrastructure on the subject lands is capable of servicing the proposed “Clinic” use without the need for upgrades.
<u>Section 2.6.4</u> Planning authorities should support a diversified rural economy by protecting agricultural and other resource-related uses and directing non-related development to areas where it will minimize constraints on these uses.	The proposal, of which comprises the reuse of an existing commercial building, contributes to a diversified rural economy by creating local employment, while protecting the natural areas on-site.
<u>Section 2.6.5</u> New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.	Based on observations of the surrounding area, there are no active livestock facilities in the vicinity of the subject property. Accordingly, the proposed use is not anticipated to be constrained by Minimum Distance Separation (“MDS”) requirements, nor is it anticipated to adversely affect existing livestock operations.
<u>Section 3.6.4</u> Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual onsite sewage services and individual on-site water services may be used provided that site conditions	The existing building containing the proposed “Clinic” will be serviced by the existing private well and private septic system.

Policy	Analysis/Response
are suitable for the long-term provision of such services with no negative impacts.	
<u>Section 4.3.1.1</u> Planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.	The proposed use will operate entirely within an existing building and does not require the conversion or fragmentation of agricultural lands. There is no active agricultural operation taking place on the portion of the site earmarked for the proposed use. No additional land will be removed from potential agricultural use, and no changes are proposed to the existing vegetated portions of the property. By utilizing an existing building without expanding the developed footprint, the proposal maintains the continuity of the agricultural land base while providing an essential healthcare service that supports the rural community and workforce. The proposal will not prejudice the long-term productive capacity of the agricultural system or the surrounding agri-food network.
<u>Section 4.3.2.1</u> In prime agricultural areas, permitted uses and activities are: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance. Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on provincial guidance or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.	The proposal represents a non-agricultural use within a Prime Agricultural Area and has been evaluated in accordance with the applicable criteria for limited non-residential use under Section 4.3.5.1(b) of the PPS.
<u>Section 4.3.2.3</u> New land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.	As mentioned above, the proposed use is not anticipated to adversely affect existing or future agricultural activities within the surrounding area.
<u>Section 4.3.5.1.b</u> Planning authorities may only permit non-agricultural uses in prime agricultural areas for limited non-residential uses, provided that all of the following are demonstrated: 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	The subject lands do not comprise a specialty crop area. There are no nearby livestock operations that trigger the application of the MDS formulae. The proposed use responds to a need for local healthcare services within the municipality's planning horizon by improving access to healthcare for rural residents. The proposal is utilizing an existing building and avoids unnecessary land disturbance. Alternative locations have been evaluated as part of the site selection process. No reasonable alternative locations outside the Prime Agricultural Area or lower priority agricultural lands were identified that would adequately serve the intended service area while making use of an existing built form and minimizing environmental and land use

<i>Policy</i>	<i>Analysis/Response</i>
ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.	impacts. Furthermore, no reasonable alternative locations on lower priority agricultural lands were identified that would achieve the same planning objectives.
<u>Section 4.3.5.2</u> Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.	The proposal has been designed to avoid impacts on the agricultural system by accommodating the “Clinic” entirely within an existing building. No expansion of the building footprint is proposed; no agricultural lands will be converted; and no vegetation removal is proposed. Minimal site alteration could be required as part of the site plan process. As such, the proposal maintains the existing character of the property and is not anticipated to interfere with surrounding agricultural operations or the long-term viability of the agricultural system.
<u>Section 4.3.6.1</u> Planning authorities are encouraged to support local food, facilitate near-urban and urban agriculture, and foster a robust agri-food network.	The proposed use contributes to the long-term sustainability of the rural community by improving access to essential healthcare services for residents, agricultural workers, and rural businesses.
<u>Section 5.2.2.b</u> Development shall generally be directed to areas outside of hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards.	The proposed use will be accommodated within an existing building and does not involve development within hazardous lands associated with flooding or erosion.

Based on the above analysis, the proposed development is consistent with the applicable policies of the Planning Act and the relevant PPS policies.

5.3 COUNTY OF MIDDLESEX OFFICIAL PLAN

The subject lands are designated “*Agricultural Areas*” in the County OP.

The subject lands have frontage onto Longwoods Road, which is classified as “*Arterial Road – County*” (Schedule ‘B’ – Transportation) and are located outside and to the east of the Delaware Community Settlement Area.

Table 2: County OP Policy Analysis

<i>Policy</i>	<i>Analysis/Response</i>
<u>Section 2.2.2.2</u> Non-agriculture uses are discouraged in the Prime Agricultural areas. Agriculture-related and on farm diversified uses shall be compatible with and not hinder, surrounding agricultural operations. Permitted agriculture-related and on-farm diversified uses shall be in accordance with the Guidelines for	The proposed development constitutes a non-agricultural use. It will minimize impacts on the Prime Agricultural Area by utilizing an existing building without expanding the developed footprint. No cultivated agricultural land will be removed from production, no additional site alteration is proposed, and the existing vegetation on the property will remain undisturbed. The proposal maintains the long-term function of the surrounding agricultural area.

Policy	Analysis/Response
Permitted Uses in Ontario's Prime Agricultural Area as amended from time to time. Non-agricultural uses shall be encouraged to located in identified Settlement Areas, and non-residential, non-agricultural uses shall only be permitted in the Agricultural Area through an amendment to the local municipal Official Plan, supported by an Agricultural Impact Assessment, in accordance with provincial guidelines, where it is demonstrated that the use will not: - detract or adversely affect present and/or future agricultural operations; - interfere with the viability of farm units; - negatively impact the Natural Heritage System, or - detract from the character of the agricultural community. The amendment to the local municipal Official Plan 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 2.1.3 of the Provincial Planning Statement for additional land to accommodate the proposed use; - alternative locations have been evaluated; - impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible mitigated to the extent feasible, as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; - 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. Examples of non-agricultural uses that are at times proposed within the agricultural area include, but are not limited to, off-season vehicle storages, rural event venues, manufacturers, contractors' yards, and landscape businesses.	An Agricultural Impact Assessment has been prepared in support of the proposed development and concludes that the proposal will not adversely affect the surrounding agricultural system. The proposed use will be accommodated within an existing developed area and does not require additional land conversion, thereby minimizing potential impacts on agricultural resources and surrounding farming operations. - The proposed development is not anticipated to detract from or adversely affect present or future agricultural operations. The proposal is contained entirely within an existing footprint and will not reduce the amount of land available for agricultural purposes or constrain surrounding farming activities. No expansion of the developed area is proposed, and no changes are anticipated that would interfere with normal farm practices. - The proposed use will not interfere with the viability of surrounding farm units. The proposal does not fragment agricultural lands, introduce incompatible development, or create operational constraints that would affect existing or future agricultural activities. The continued use of an existing built form maintains the current site configuration while avoiding impacts on adjacent agricultural operations. - The proposed development will be accommodated entirely within an existing building and does not require vegetation removal, grading, or expansion of the existing development footprint. As a result, the proposal will not negatively impact the Natural Heritage System or the existing environmental features located on the property. - The proposed development will maintain the existing rural character of the property by utilizing a previously developed portion of the lands while avoiding new site disturbance. The proposal introduces an essential healthcare service without altering the established rural landscape or affecting the ongoing agricultural character of the surrounding area. Accordingly, the proposal is not anticipated to detract from the character of the agricultural community. - The subject property is not located within a specialty crop area. - There are no nearby livestock operations that trigger the application of the Minimum

Policy	Analysis/Response
	Distance Separation (MDS) formulae. Accordingly, the proposed use will not create land use conflicts associated with livestock facilities. • The proposed development addresses an identified need for accessible healthcare services within the municipality's planning horizon by improving access to primary healthcare for rural residents. The proposal introduces an essential community service while utilizing an existing building and avoiding unnecessary land disturbance. • Alternative locations were evaluated as part of the site selection process. No reasonable alternative locations outside the Prime Agricultural Area or lower priority agricultural lands were identified that would adequately serve the intended service area while utilizing an existing building and minimizing environmental and land use impacts. • Impacts on the agricultural system have been avoided by locating the proposed development within an existing building and maintaining the existing development footprint. No cultivated lands will be converted, no vegetation removal is proposed, and the proposal will not interfere with surrounding agricultural operations. Accordingly, impacts on the agricultural system are anticipated to be negligible.
<u>Section 3.3.2</u> It is the policy of County Council that the Agricultural Area in Middlesex County shall be preserved and strengthened with the goal of sustaining the agricultural industry and promoting local food production that is so vital to the Middlesex economy. In the Agricultural Areas, farm parcels shall remain sufficiently large to ensure flexibility and the economic viability of the farm operation. The creation of parcels of land for agriculture of less than 40 hectares shall generally not be permitted. Agriculture-related and on-farm diversified uses may be permitted in the Prime Agricultural Areas subject to the criteria provided in the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas and Section 3.3.5 of this plan. Such uses may be subject to site specific zoning regulations	The proposed development has been designed to maintain the integrity of the Agricultural Area by utilizing an existing building and avoiding the conversion of agricultural lands. No cultivated agricultural areas will be removed from production, and no expansion of the developed area is proposed. The proposal will not diminish the County's ability to sustain agricultural operations or support the broader agricultural system. The proposed development does not involve the creation of a new lot, the severance of agricultural lands, or the fragmentation of an existing farm parcel. The proposal maintains the existing parcel configuration and does not reduce the flexibility or economic viability of surrounding agricultural operations. The proposal has been evaluated as a non-agricultural use within a Prime Agricultural Area in accordance with the applicable policies of the

Policy	Analysis/Response
and are not removed from the Agricultural Area land use designation. 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.	Provincial Planning Statement, 2024 and the County of Middlesex Official Plan. The proposed development avoids potential impacts on the agricultural system by utilizing an existing building and maintaining the current developed area of the property. No new development footprint is proposed, and no vegetation removal or site alteration is required. The proposed use will not introduce constraints on surrounding agricultural operations or interfere with normal farm practices. As demonstrated through the enclosed Agricultural Impact Assessment (AIA), the proposal will not adversely affect the long-term viability of surrounding agricultural operations. Where any potential impacts are identified, appropriate mitigation measures will be incorporated into the proposed development to ensure compatibility with the surrounding agricultural area.
<u>Section 3.3.3</u> Agricultural Areas shall generally permit the following use: a) agricultural uses; b) a primary dwelling unit and up to two Additional Residential Units in accordance with Section 2.3.7.5; c) forestry uses; d) mineral aggregate and petroleum extraction; e) conservation; f) public and private open space and recreation facilities (subject to Provincial Planning Statement policies for site-specific non-agricultural uses as provided in Section 4.3.5.1 (b) of the Provincial Planning Statement); g) home occupation; h) occasional agricultural demonstration events such as a plowing match; i) retail stands for the sale of agricultural products produced on the farm unit upon which the retail stand is located; and j) bed and breakfast establishments; k) farm worker housing; l) agriculture-related and on-farm diversified uses in accordance with Section 3.3.5; and m) public uses.	The proposal has been evaluated under the applicable policies governing non-agricultural uses within Prime Agricultural Areas, including the requirements for demonstrating need, consideration of alternative locations, and minimizing impacts on the agricultural system.
<u>Section 3.3.5</u> Agriculture-related and on-farm diversified uses directly related to, and supportive of, agricultural operations, including feed mills, grain drying, abattoirs, agricultural research centres, farm equipment repair shops, agri-tourism and	Not applicable

Policy	Analysis/Response
veterinary clinics may be permitted providing the following policies are considered: a) the agriculture-related uses cannot reasonably be located in a Settlement Area and must be located in proximity to farming activities; b) such uses shall be located to conform with the Minimum Distance Separation Formula; c) where local zoning by-laws do not provide as of right zoning for agriculture related and on-farm diversified uses a site specific amendment to the Zoning By-law is approved; d) the agriculture-related and on-farm diversified uses shall not require large volumes of water nor generate large volumes of effluent and shall be serviced with appropriate water supply and sewage treatment facilities; e) agriculture-related and on-farm diversified uses shall be located and designed to minimize potential adverse impacts upon adjacent residential or other sensitive uses by buffering measures such as landscaping, berming and building setback and layout; f) the location agriculture-related and on-farm diversified uses must provide for a minimum sight distances from the access points in either direction along a County or local road; g) the site plan policies of local official plan; h) the agriculture-related or on-farm diversified uses shall be in accordance with the Provincial Guidelines on Permitted Uses in Prime Agricultural Areas; i) for on-farm diversified uses, the use is located on a farm, is secondary to the principal agricultural use of the property, and is limited in size and scale relative to the size of the farm property; j) agriculture-related and on-farm diversified uses are to remain within the Agricultural Areas land use designation and are permitted without the need to amend this plan; and k) proposed access to highways under the jurisdiction of the Province of Ontario, or proposed access in proximity of such highways or interchange ramp terminals, shall be subject to the regulations and policies of the Ministry of Transportation and design and construction of these proposed accesses will be subject to the approval of the Ministry.	

For the reasons outlined above, it is our professional opinion that the proposed development generally conforms with the intent of the County OP policies applicable to Agricultural Areas and Prime Agricultural Areas.

5.4 MIDDLESEX CENTRE OFFICIAL PLAN

The subject lands are designated “Agriculture” in the Middlesex Centre OP with frontage along a County Arterial Road. The proposed “Clinic” use is not currently listed as a permitted use in the Agriculture designation, and as such the submission of an OPA is required.

Section 2.0 of the Middlesex Centre OP defines the policies for agricultural areas within the municipality. The following table (Table 3) is an analysis of the applicable policies for the proposed development.

Table 3: Middlesex Centre OP Policy Analysis

<i>Policy</i>	<i>Analysis/Response</i>
Section 2.1 The following goals relate to lands within the Agriculture designation. These include the majority of lands outside of the Municipality’s settlement areas. a) To preserve agriculture as the primary land use outside of settlement areas within the Municipality. b) To recognize the agricultural heritage within the Municipality, and the significant importance of agriculture to not only the rural community, but also to the viability and character of settlement areas within the Municipality, and to the Provincial economy as a whole. c) To protect agricultural areas from interference or encroachment from conflicting land uses, or uses which could reduce or negatively impact the future flexibility or efficiency of agricultural operations. d) To enhance the viability of farm operations wherever possible to ensure their continued economic strength. e) To encourage the retention of existing woodlots within the Municipality, and encourage the establishment of new or expanded woodlots on lands with poor soil capability for agriculture. f) To encourage good farm management and stewardship practices, and agricultural practices that consider the health of the natural environment.	a) The proposed development recognizes the importance of agriculture as the primary land use within the Agricultural Area and has been designed to minimize impacts on the agricultural land base. The proposed development will be accommodated within an existing built form and does not require the conversion of cultivated agricultural lands or expansion into currently undeveloped areas. The proposal maintains the overall function and character of the Agricultural Area while introducing a compatible rural service. b) The proposed development acknowledges the importance of agriculture within Middlesex Centre by maintaining the existing agricultural landscape and avoiding impacts to surrounding agricultural operations. The proposal provides an essential community service that supports the rural population, including residents and those associated with the agricultural sector, while maintaining the agricultural character of the surrounding area. c) The proposed development has been designed to avoid interference with surrounding agricultural operations. The use will be contained within a previously developed portion of the lands, will not require additional land disturbance, and will not introduce constraints that would limit normal farm practices. The proposal does not create new residential development, lot fragmentation, or incompatible agricultural interfaces that could negatively affect the future flexibility or efficiency of surrounding agricultural operations. d) The proposed development will not adversely affect the viability of surrounding farm operations. The proposal does not remove agricultural lands from production, reduce the size of existing farm parcels, or restrict

Policy	Analysis/Response
	agricultural activities. By maintaining the existing site configuration and avoiding conflicts with surrounding agricultural uses, the proposal supports the continued viability of nearby farm operations. e) The proposed development supports the retention of existing natural features on the property by avoiding vegetation removal. No expansion of the developed area is proposed, and the existing protected vegetation will remain undisturbed. A Development Assessment Report (“DAR”) was completed by MTE Consultants Inc., which concluded that no negative ecological impacts are anticipated within or adjacent to the Subject Lands from the proposed development. f) The proposed development does not interfere with surrounding agricultural practices or stewardship activities. The proposal maintains existing site conditions and avoids impacts to agricultural lands and natural features, thereby supporting the continued responsible management of the surrounding agricultural area.
<u>Section 2.2</u> a) Non-agricultural urban uses within agricultural areas are prohibited, unless specifically permitted in other subsections of Section 2.0 of this Plan. b) New estate residential lots outside of settlement areas are prohibited. c) The fragmentation of farm parcels in agricultural areas is strongly discouraged. d) The expansion of farm parcels through lot assembly is encouraged wherever possible.	a) The proposed development is not considered an urban use and is not intended to facilitate urban expansion into the Agricultural Area. The proposal represents a non-agricultural use that will be accommodated within an existing building and has been evaluated in accordance with the applicable policies governing non-agricultural uses within Prime Agricultural Areas. The proposal does not require the expansion of the settlement area boundary. b) The proposed development does not involve the creation of residential lots or estate residential development. c) The proposed development will not result in the fragmentation of agricultural parcels. No severance, lot creation, or alteration to the existing parcel fabric is proposed. The proposal maintaining the existing configuration of the property and surrounding agricultural lands. d) The proposal does not involve the creation or expansion of farm parcels through lot assembly.
<u>Section 2.3</u> Agricultural areas are intended to be used predominantly for agriculture and agriculture related uses. This includes all forms of farming, including the principal farm dwelling, related buildings and structures, practices and uses of land.	The proposal has been evaluated as a non-agricultural use within the Agricultural Area. The proposed development does not require the removal of agricultural lands, fragmentation of farm parcels, or impacts to surrounding agricultural operations.

Policy	Analysis/Response
Other permitted uses in agricultural areas include the following: • Commercial or industrial activities directly related to agriculture and required in close proximity to associated farming operations, or “value-added” agriculturally related uses as defined in Section 12.0. • Retail sale of farm produce produced on individual properties or communally among neighbouring farms. Such communal operations should not be of a size, scale or nature likely to negatively affect the rural character of the area in question. Size and scale will be further regulated in the Municipality’s zoning by-law. • Forestry and woodlots. • Bed and Breakfast Establishments • Home Occupations. • Natural areas and conservation uses. • Residence Surplus to a Farming Operation. • Small scale public and private passive recreation areas, subject to site specific zoning. • Commercial Wind Energy Generation Systems (CWEGS) subject to site specific Zoning By-law Amendment. Notwithstanding the permitted uses set out in section 2.3 of this Plan, non-farm residences which existed prior to the establishment of the Middlesex Centre on January 1, 1998 may be used, altered, reconstructed, repaired and renovated provided that the reconstruction, repair or renovation, as the case may be, is undertaken in full compliance with all applicable law. In addition to the above, any lots, which existed lawfully prior to the establishment of Middlesex Centre on January 1, 1998 and which are vacant may be used for the construction of a non-farm residence, if the use is permitted by the Comprehensive Zoning By-law and if the non-farm residence is constructed in full compliance with all applicable law, including Minimum Distance Separation Formula 1.	
<u>Section 2.5</u> Non-agricultural related uses, save and except for those specifically permitted in this Plan, are prohibited within agricultural areas. Non-agricultural residential development will be limited to those consent-for-severance opportunities identified in Section 10.3 of this Plan. All other proposals for non-agricultural residential	While the proposed development is technically a non-agricultural use within the Agricultural Area, the applicable Provincial Planning Statement policies and the unique and special circumstances of the proposal support its consideration. The proposal has been designed to minimize impacts on the agricultural system by utilizing an existing commercial building, maintaining the existing

Policy	Analysis/Response
development within agricultural areas, including estate residential proposals, will be prohibited.	development footprint, and avoiding impacts to cultivated agricultural lands and surrounding farm operations. Further, the proposal does not represent urban expansion, estate residential development, or a use that would contribute to the fragmentation of agricultural lands. The proposed development provides an essential rural service while maintaining compatibility with the surrounding Agricultural Area.
<u>Section 2.7</u> In order to avoid land use conflicts within the Agricultural Areas designation, it is the policy of this Plan that the Minimum Distance Separation Formulae (referred to as MDS I and MDS II) are used to establish appropriate standards for separating new development from existing, new or expanding livestock facilities. These standards also apply to the review of the location or expansion of livestock facilities in proximity to existing or approved development.	The proposed development has been reviewed in consideration of the Minimum Distance Separation (MDS) requirements. Based on a review of available aerial imagery, existing site conditions, and surrounding land uses, there are no livestock facilities within the vicinity of the subject property that would trigger the application of MDS I or MDS II. Accordingly, the Minimum Distance Separation Formulae are not applicable to the proposed development. The proposed development will not introduce land use conflicts with surrounding agricultural operations and maintains compatibility with the surrounding Agricultural Area.

The proposed development is consistent with the intent of the Middlesex Centre Official Plan policies applicable to Agricultural Areas. While the proposal represents a non-agricultural use within the Agricultural Area, it has been designed to minimize impacts on the agricultural system by utilizing an existing building and maintaining the existing development footprint. The proposal will not result in the loss or fragmentation of agricultural lands, interfere with surrounding farm operations, or negatively impact the rural character or natural features of the property. The proposed development satisfies the intent of Sections 2.1, 2.2, 2.3, 2.5, and 2.7 by protecting the agricultural land base, avoiding land use conflicts, and providing an appropriate rural service while maintaining compatibility with surrounding agricultural uses.

5.5 MIDDLESEX CENTRE ZONING BY-LAW

The subject lands are currently zoned “*Agricultural (A1)*” in the ZBL (see Figure 11, shown on page 23). The permitted uses for the A1 zone are as follows:

- Accessory use;
- Additional residential unit;
- Agricultural use;
- 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;

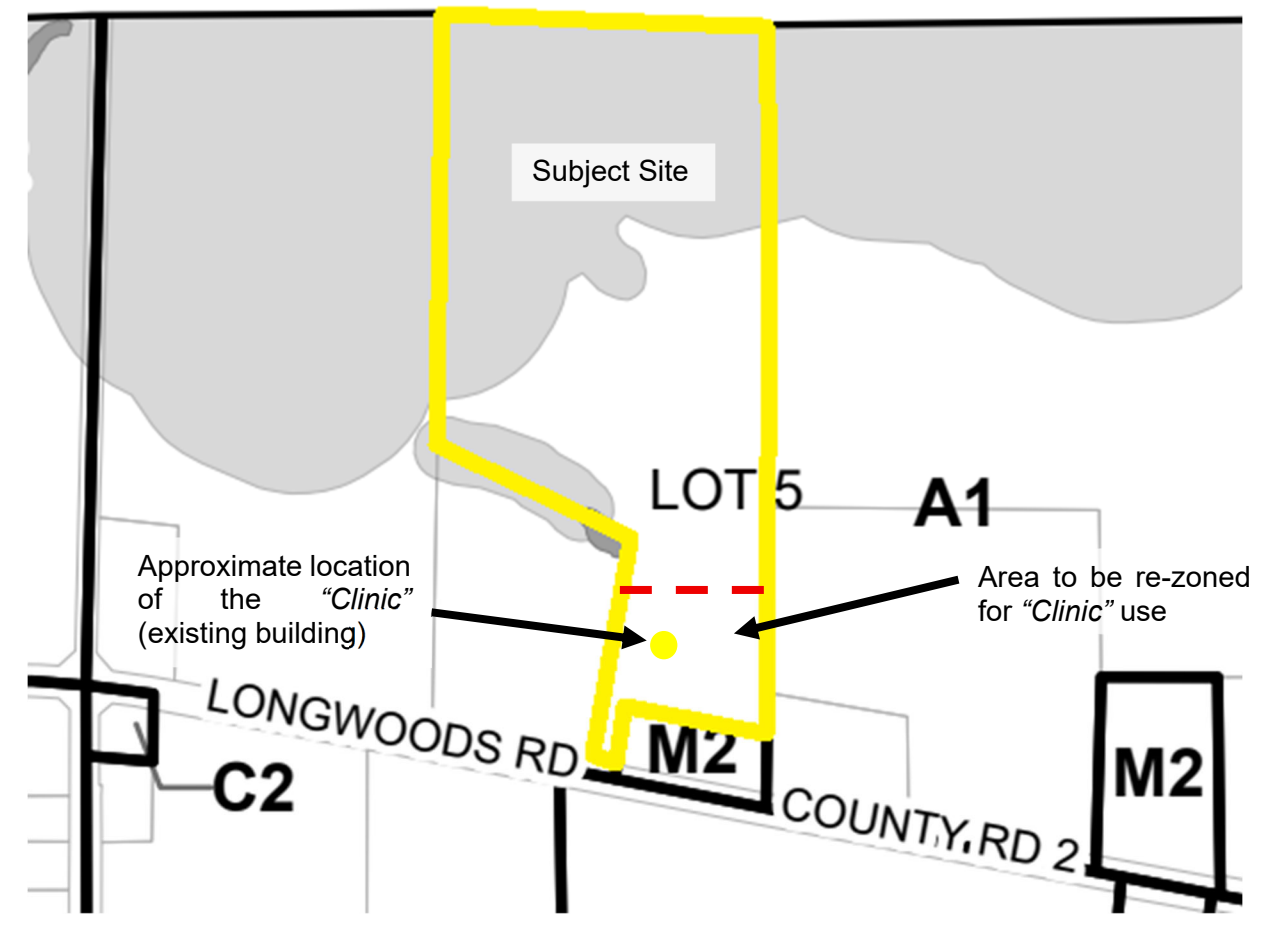
- Riding school;
- Single detached dwelling;
- On-farm diversified use;
- Portable asphalt plant; and
- Wayside pit

A “Clinic” is not currently listed as a permitted use in the A1 zone. Therefore, the submission of a ZBA is required to add the proposed “Clinic” use as a site-specific permitted use for the application lands.

The zoning context surrounding the subject lands includes a mix of industrial and commercial uses. Lands directly abutting the subject lands are zoned for industrial purposes, with additional industrial and commercial-zoned lands located in the vicinity. This established mix of land uses provides context for the proposed “Clinic” and demonstrates that the subject lands are located within an area where agricultural, commercial, and industrial uses already occur in proximity to one another. The proposed “Clinic” will be contained within a portion of the existing building and will not require an expansion of the existing footprint. The proposed use is not anticipated to introduce a significant change to the established land use pattern or create compatibility issues for the surrounding land uses.

No special zoning provisions are being requested under this application.

Figure 11 – Existing Zoning (excerpt)



6.0 ADDITIONAL ANALYSIS

6.1 PUBLIC CONSULTATION STRATEGY

In accordance with the Act, Derek and Alanna Fitzpatrick and Zelinka Priamo Ltd. are committed to undertaking public consultation in accordance with the applicable requirements and guidelines for the OPAs and ZBA.

The Applicant will work collaboratively with the applicable municipality and members of the public throughout the planning process and will provide opportunities for meaningful public input, including through any required public meetings, notices, consultation materials, and other engagement processes identified by the municipality. The Applicant will consider and respond to comments received through the consultation process, as appropriate, and will make reasonable efforts to ensure that interested members of the public are informed of the application and its progress.

The Applicant will continue to abide by all applicable statutory, municipal, and procedural requirements respecting public consultation throughout the review and consideration of the OPAs and ZBA applications.

6.2 TECHNICAL STUDIES

The following technical reports support the proposed development.

6.2.1 Traffic Impact Brief

A Traffic Impact Brief dated September 2026 was prepared by RC Spencer Associates Inc. to examine the proposed development potential impact on area traffic. Turning movement counts were collected on June 4, 2026, for the existing site access at Longwoods Road.

During the Pre-Consultation process, Middlesex County staff requested that Longwoods Road be upgraded to accommodate a left turn slip and a right turn lane taper at the site access.

Based on the findings in this report, it was concluded that the very low projected traffic volumes do not justify the implementation of a dedicated left turn lane nor a dedicated right turn taper.

6.2.2 Development Assessment Report

A Development Assessment Report (“DAR”) dated September 3, 2026, was undertaken by MTE Consultants Inc. as this development was located within 50 metres of a Significant Woodland. The intention of the DAR was to assess the potential impacts of the proposed development to the subject lands. A site visit was conducted on June 17, 2026.

The conclusion of the report determined that there would be no negative ecological impacts on or adjacent to the subject lands as a result of the proposed development.

7.0 AGRICULTURAL IMPACT ASSESSMENT

According to the 2024 PPS, an Agricultural Impact Assessment (“AIA”) is required for new or expanding non-agricultural uses on the agricultural system (Section 4.3.5.2) to evaluate potential impacts of proposals on agricultural operations and the agricultural system. An AIA was prepared by Zelinka Priamo Ltd. as part of a requirement for complete OPA/ZBA applications.

This Assessment is generally consistent with OMAFRA’s Draft Guidance Document for Agricultural Impact Assessments (2018), which includes a review of relevant agricultural policies (discussed in Section 5.0 of this report), the review of additional agricultural-related sources of information, and the completion of a site visit.

The following sections provide details on the sources reviewed, evaluation of the potential impact of the proposed additional use for the subject lands, recommendations, and conclusions.

7.1 FIELD INVESTIGATION

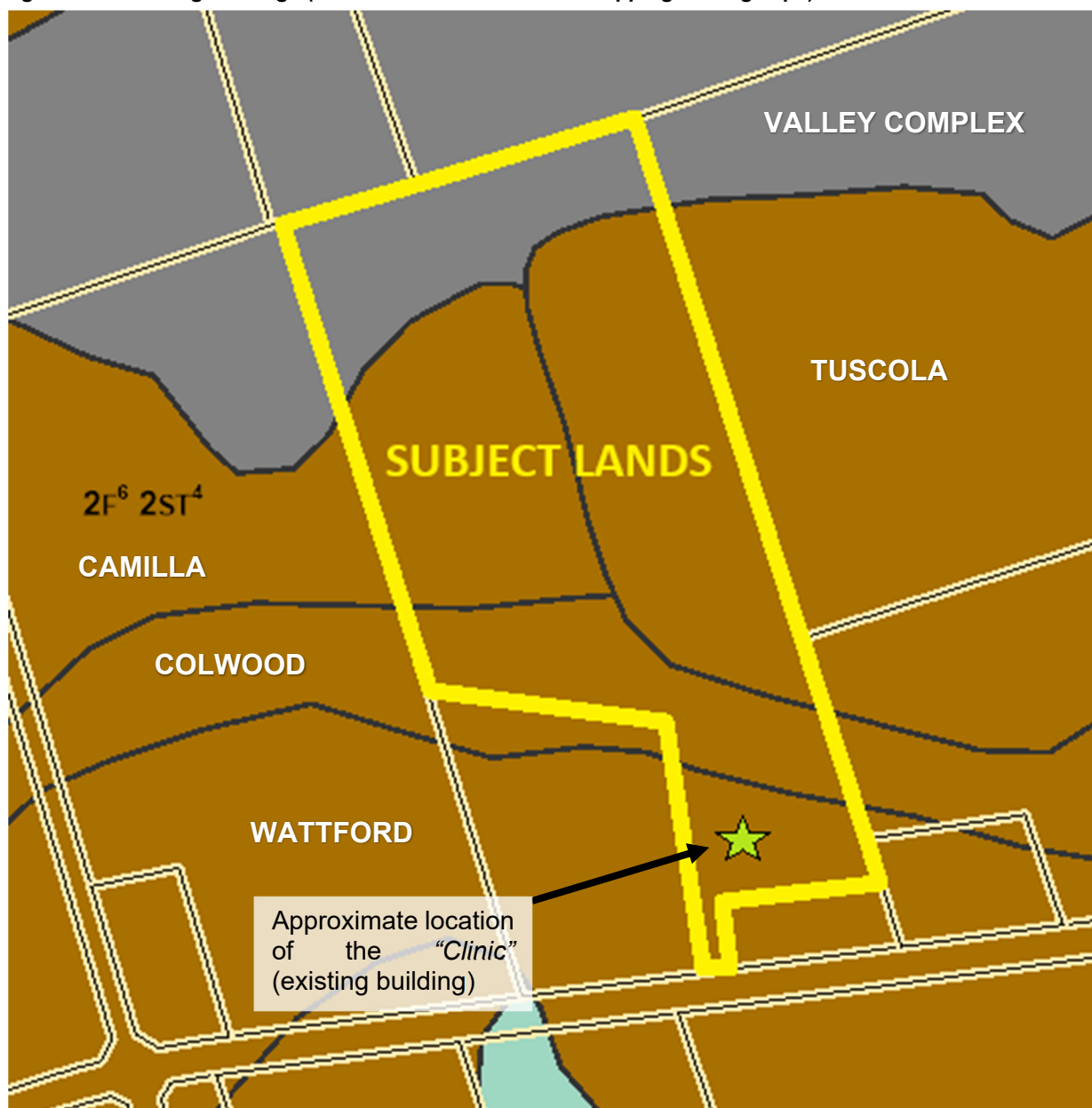
A site visit was carried out on June 17, 2026, to identify land uses of the surrounding areas and to identify types of agricultural operations. During the site visit, no crops were observed due to the amount of vegetation coverage (woodlot) on the subject lands.

7.2 CLI AGRICULTURAL LAND CLASSIFICATION

The OMAFRA’s online mapping tool “AgMaps” provides soil mapping (“Soil Capability for Agriculture” layer) for the province. According to this online mapping, the subject lands are comprised of soils in Class 2 (Figure 12, shown on next page).

According to the OMAFA’s Soil Capability for Agriculture in Ontario (2024), soils in Class 2 have moderate limitations that reduce the choice of crops or require moderate conservation practices. These soils are deep but may not hold moisture and nutrients as well as Class 1 soils.

Figure 12 – Existing Drainage (Source: OMAFRA's online mapping tool AgMaps)



The soils in the subject lands are classified as Wattford, Colwood, Camilla, and Tuscola. A portion of the property is also mapped as Valley Complex, which is a landscape description used to indicate that an area contains a complex mix of soils associated with valley landforms. The soil classification in the area where the "Clinic" is proposed is Wattford.

The soils on the subject lands are described in the report entitled "The Soils of Middlesex County" – Report No. 56 of the Ontario Centre for Soil Resource Evaluation, published in 1992. According to this report, the Wattford soils were developed on glaciolacustrine deposits, and usually present well to imperfect drainage.

7.3 DRAINAGE

The OMAFRA's online mapping tool "AgMaps" provides artificial drainage mapping for the province. This online tool was accessed to obtain drainage mapping for the subject lands and surrounding area.

One (1) constructed drain is identified within the subject lands: Biggar Drain, which is a closed/tiled drain located northwest of where the "Clinic" use is proposed. Further west along the Biggar Drain is an open drain, which outlets into Dingman Creek.

No other tile drains are identified on the subject lands.

Figure 13 – Existing Drainage (Source: OMAFRA's online mapping tool AgMaps)



As no development is proposed, no changes to the existing drainage conditions are anticipated.

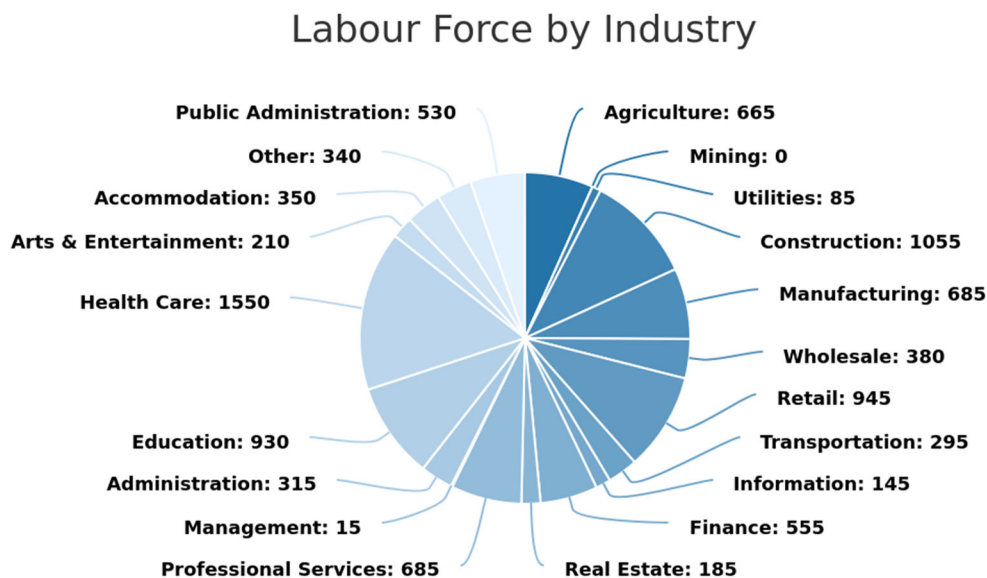
7.4 ASSESSMENT OF CONFORMITY WITH AGRICULTURAL POLICIES

Section 5.0 of this report provides a summary of the relevant agricultural policies and a policy analysis detailing how the proposed development is consistent with the applicable PPS policies, generally conforms with the applicable County OP and Middlesex Centre OP policies, and generally complies with policies of the ZBL.

7.5 ASSESSMENT OF ECONOMIC PROFILE OF THE MUNICIPALITY OF MIDDLESEX CENTRE

The Municipality of Middlesex Centre's economy has historically relied on the agricultural industry, which continues to be a major contributor to the local economy and culture. According to the 2021 Census, the labour force in "agriculture, forestry, fishing, and hunting" employs approximately 665 individuals in the Municipality, making it the seventh largest employment sector (Figure 14).

Figure 14 – Municipality's Labour Force by Industry – 2021 Census (Source:



The proposed "Clinic" will provide additional employment opportunities and services to the surrounding agricultural operations and have a positive impact on the agricultural community, while protecting surrounding agricultural operations.

7.6 POTENTIAL IMPACT AND MITIGATION MEASURES

Based on our analysis of the existing agricultural operations in the surrounding area, relevant agricultural policies, and information on soils and drainage, it is our professional opinion that the

proposed “Clinic” is considered a use located in an area with lower priority agricultural lands in prime agricultural lands.

The proposed location for the “Clinic” is not an area actively used for agriculture. The vegetation (woodlot) on the property restricts the potential for these lands to be utilized as viable agricultural lands, thereby having minimal negative impacts on the overall agricultural system. As confirmed in the DAR, existing vegetation will be protected.

Moreover, the proposed “Clinic” can be viewed as a valuable component of the agri-food network, as it provides a direct service to agricultural operations in the vicinity. Its location near farm operations is a positive addition to the surrounding agricultural operations. The proposed “Clinic” is subject to a future Site Plan Approval process where any proposed changes will be thoroughly reviewed and will be subject to any required mitigation measures.

8.0 CONCLUSION

Based on the foregoing analysis, it is our professional opinion that the proposed Official Plan Amendments and Zoning By-law Amendment are consistent with the PPS, generally conform to the County OP and the Middlesex Centre OP, and comply with the intent of the ZBL.

The proposed “Clinic” is an adaptive reuse of the existing vacant commercial building on the subject lands and is a unique, site-specific consideration within the Agricultural designation, which will not result in any adverse compatibility issues for surrounding land uses.

As such, it is our professional opinion that the proposed development represents good planning practice and is in the public interest.

Prepared by:

ZELINKA PRIAMO LTD.



Devon Posthumus, CPT
Planner