

Planning Justification Report

Glendon Drive at Jefferies Road (Block 60 Plan 33M-656)

Municipality of Middlesex Centre, County of Middlesex

Orange Rock Developments Inc.



February, 2020

REVISED November 17th, 2022



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1.0 INTRODUCTION

Orange Rock Developments Inc. submitted an application to the Municipality of Middlesex Centre to amend its Official Plan and Zoning By-Law for lands at the southeast corner of Glendon Drive and Jefferies Road. The original application was submitted in February 2020, and the application was deemed complete at that time. The purpose of this revised report is to reflect an up-to-date planning analysis based on a revised concept plan. The purpose of the proposed Official Plan Amendment and Zoning By-Law Amendment is to facilitate the residential development of the subject lands for townhomes and multiple unit dwellings (i.e. stacked townhousing or a low-rise apartment building).

This Planning Justification Report evaluates the proposed Official Plan Amendment and Zoning By-Law within the context of existing land use policies and regulations, including the Provincial Policy Statement, the Middlesex County Official Plan, the Municipality of Middlesex Centre Official Plan and the Municipality of Middlesex Centre Zoning By-law. An Official Plan review has been completed by the Municipality since the original submission of these applications; therefore, a revised Planning Justification Report was considered necessary to reflect the most recent Official Plan policies.

2.0 THE SUBJECT LANDS

The subject lands have an irregular shape, and are generally located at the southeast corner of Glendon Drive and Jefferies Road, in the community of Kilworth, in the Municipality of Middlesex Centre, in Middlesex County (Figures 1-2). The subject lands are the eastern part of Block 60 in the Komoka-Kilworth Settlement Area. A portion of the Block on the corner of Glendon Drive and Jefferies Road has been developed for a Home Hardware Building Supply Store. An office-commercial building has been more recently granted site plan approval and is under construction. The subject lands have a lot frontage of approximately 9.8m (32.2ft) along Dausett Drive, and an area of approximately 1.089 ha (2.691 ac). The lands are vacant (Figures 3-5). Access to the subject lands is available from Dausett Drive. Full municipal services are available. There are no significant cultural and archaeological features and no man made or natural hazards on the subject lands.

The subject lands are designated “Settlement Areas” (Urban and Community) in the Middlesex County Official Plan and “*Settlement Commercial*” in the Komoka-Kilworth Urban Settlement Area and Secondary Plan in the Municipality of Middlesex Centre Official Plan, and are zoned “*Highway Commercial (C2-9)*” in the Middlesex Centre Zoning By-Law 2005.

Figure 1 – Subject Lands and Area Context (Location and Boundaries are Approximate)



Figure 2 – Subject Lands Boundary



Figure 3 –Glendon Drive looking east (Google Streetview)



Figure 4 – Subject lands from Glendon Drive looking south at the subject lands (Google Streetview)



2.1 SURROUNDING LAND USES

The subject lands abut low-density residential uses in the form of townhouses and single detached dwellings to the east (Figure 5). They are located across Dausett Drive from low density residential uses in the form of single detached dwellings (Figure 6). To the west of Block 60, across Jefferies Road, is the Kilworth Business Park which consists of a range of commercial, office, commercial recreation, and light industrial uses (Figure 7). The Kilworth Children’s Centre (daycare) is located at the southwest corner of Jefferies Road and Dausett Drive/Enterprise Drive. Lands to the north of the subject lands, on the north side of Glendon Drive, consist of a small cultivated field, wooded lands, rural residential uses, and open space. The predominant land use in the community of Kilworth is single-detached dwellings.

Figure 5 – Low Density Residential Uses to the East of the Subject Lands (Google Streetview)

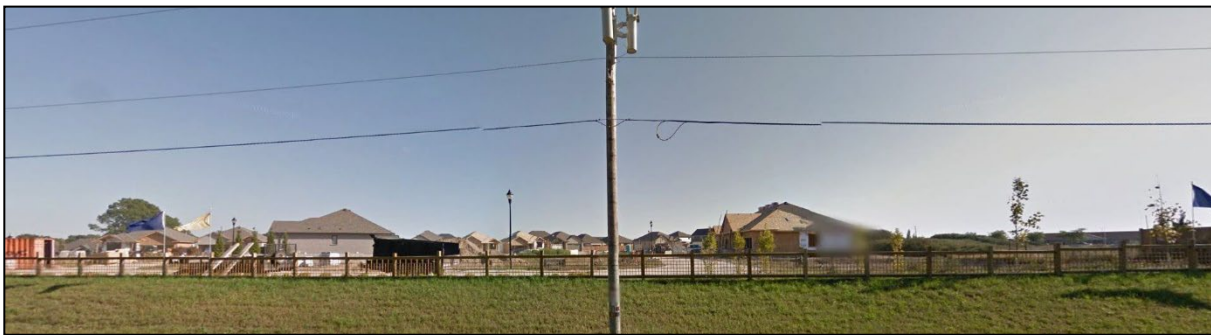


Figure 6 – Low Density Residential on Dausett Drive (Google Streetview)



Figure 7 – Kilworth Business Park, West of the Subject Lands, from Jefferies Road (Google Streetview)



The intersection of Glendon Drive and Jefferies Road is a major intersection in the community of Komoka-Kilworth, and is considered a community focal point. An Environmental Assessment (EA) was undertaken to evaluate potential roundabout options to implement at this intersection. Road widening dedication for the subject lands has been granted to the Municipality for the purpose of implementing the roundabout.

Glendon Drive is designated as a *Four Lane Arterial County Road*, under the jurisdiction of the County of Middlesex, while Jefferies Road and Dausett Drive are local roads, under the jurisdiction of the Municipality of Middlesex Centre.

3.0 PROPOSED DEVELOPMENT

The westerly and southerly portion of the subject lands are proposed to be developed for 16 condominium townhomes. The interior of the lot and portion of the lot along Glendon Drive is proposed to be used for a 4-storey apartment building / stacked townhousing with approximately 48 units for a total of 64 units proposed, along with sufficient parking spaces at grade and a common amenity area centrally located (Figure 8). The proposed development is not anticipated to shadow neighboring properties and the scale of development is compatible with abutting lands.

Figure 8 – Conceptual Development Plan (excerpt)



Vehicular access to the proposed development is from Dausett Drive. The proposed private drive aisle provides circulation throughout the development and loops around the entirety of the property. Individual driveway access is provided off the internal drive for the townhouse units with parking spaces provided for the apartment units/stacked townhousing units.

There is no direct vehicular access proposed from Glendon Drive.

Appropriate setbacks are proposed from Glendon Drive to provide sufficient space for landscaping between Glendon Drive and the proposed residential dwelling units. Proposed setbacks for the townhouse units on the westerly side of the subject lands provide adequate space for landscaping and fencing to effectively buffer the units from the Home Hardware.

The proposed concept plan is preliminary and will be refined through a future detailed Site Plan Approval application.

4.0 PROPOSED PLANNING ACT APPLICATIONS

The proposed residential development is not contemplated in the Komoka-Kilworth “*Settlement Commercial*” land use designation, nor is it permitted in the current “*Highway Commercial (C2-9)*” zone. As such, an Official Plan Amendment (OPA) to change the designation on the subject lands from “*Settlement Commercial*” to “*Medium Density Residential*”; and, a Zoning By-Law Amendment (ZBA) to rezone the lands from a C2-9 zone to a UR3 zone with exceptions, are proposed to facilitate the development.

5.0 PLANNING DOCUMENT REVIEW AND ANALYSIS

5.1 2020 PROVINCIAL POLICY STATEMENT (PPS)

The Provincial Policy Statement (PPS), issued under the authority of Section 3 of the Planning Act “*provides policy direction on matters of provincial interest related to land use planning*” in order to ensure efficient, cost-efficient development and the protection of resources. All planning applications, including OPA and ZBA applications, are required to be consistent with these policies.

Section 1.1.1

Healthy, liveable and safe communities are sustained by:

- a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;*
- b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*
- e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.*

As discussed throughout this report, the proposed development is an efficient and appropriate form of development on the subject lands. It adds to the range and mix of housing types that meet the long-term housing needs for a variety of demographics. The proposed development is a compact and cost-effective form of development that will maximize the use of existing municipal services within the existing built-up area of Kilworth. No extension of municipal services is required. The need for additional commercial lands is addressed in Appendix 'A'.

Section 1.1.3.1

Settlement areas shall be the focus of growth and development.

The subject lands are within the settlement area of Komoka-Kilworth, an appropriately designated *Settlement Area* in the County and Municipal Official Plans.

Section 1.1.3.2

Land use patterns within settlement areas shall be based on:

- a) efficiently use land and resources;*
- b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;*

Section 1.1.3.3

Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.

The proposed development adds to the medium density housing mix of residential land uses in Komoka-Kilworth and makes efficient use of vacant land, infrastructure, and the existing transportation network. The proposed development is appropriate infill and intensification as it proposes the development of a vacant portion of land within an existing built-up area. The subject lands are at an appropriate location for modest intensification. The lands are located adjacent to commercial land uses, and medium and low density residential land uses. The lands have convenient access to an arterial road via Dausett Drive and Jefferies Road. The lands can accommodate the proposed number of dwelling units and parking, while also providing appropriate building setbacks. The proposed development will make use of existing municipal services along Dausett Drive.

Section 1.1.3.4

Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.

The proposed Zoning By-law Amendment provides appropriate development standards to facilitate intensification while avoiding risks to public health and safety. The proposed Zoning By-law provides adequate setbacks from existing residences, as well as separation for both Glendon Drive and the commercial area with the Home Hardware and the office/commercial

building currently under construction. We note that the Home Hardware development includes enhanced fencing requirements around the outdoor storage yard to protect existing residential development in the area. These enhancements will provide similar protection to the proposed residential uses. The subject lands are also close to commercial, institutional and service amenities in the Komoka-Kilworth settlement area, encouraging the use of active transportation as promoted by the PPS and Official Plan policies.

Section 1.1.3.6

New development taking place in designated growth areas should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities.

The proposed development is within an existing built-up residential area in a designated growth area. The proposed density of 60uph is permitted by the Middlesex Centre Official Plan. The proposed density is a compact form of housing which adds to the mix of the existing residential, commercial and employment uses in the area. As noted later in the report, the proposed density can be achieved with only one minor proposed zone variation (other than the density increase) to address an existing site specific frontage situation. This provides strong evidence that the site is capable of accommodating the proposed increase in density.

Section 1.4.3

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:

- b. permitting and facilitating:
 - 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;**

The proposed development contributes to a range and mix of housing types to accommodate future growth in the Komoka-Kilworth area, and is consistent with the municipality's intent to encourage appropriate intensification. The proposed development has been designed to offer appropriate housing forms on part of Block 60.

Section 1.6.6.2

Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.

The proposed development will make use of full municipal services. There are sufficient reserve capacities to service the proposed development.

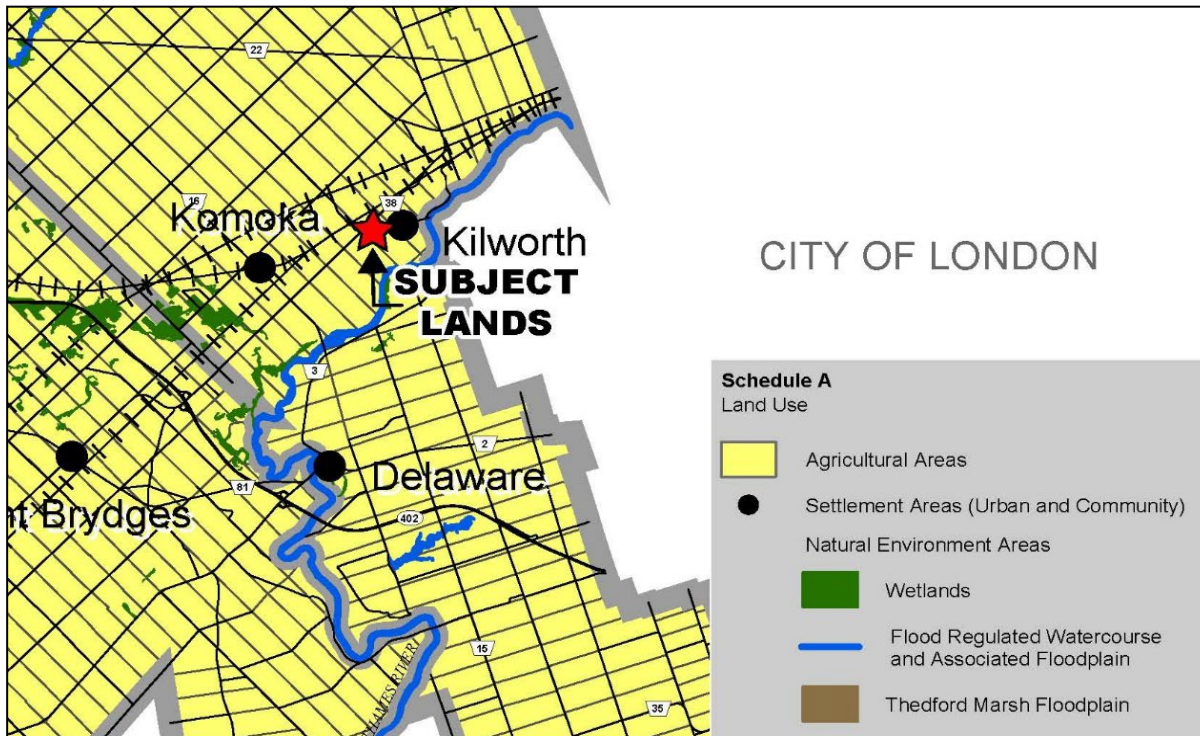
As addressed above, the OPA and ZBA to facilitate the proposed development are consistent with the relevant policies of the 2014 Provincial Policy Statement.

5.2 MIDDLESEX COUNTY OFFICIAL PLAN

The Middlesex County Official Plan was adopted by County Council on September 9, 1997, it was amended by Official Plan Amendment No. 3 adopted on June 17th, 2022 and finalized July 19th, 2022. The Official Plan, which was current at the time this report was revised, is the latest adoption of the Middlesex County Official Plan.

The subject lands are designated “Settlement Areas (Urban and Community)” on Schedule A Land Use (Figure 10). Applicable policies are found in **Sections 2.3 Growth Management and 3.2 Settlement Areas**.

Figure 10 – Middlesex County OP Schedule A (Excerpt), Approximate Location of Subject lands (Red Star)



Komoka-Kilworth has full municipal services and the range of uses and services which qualifies it as a designated Urban Settlement Area in **Section 2.3.2** Growth Management Hierarchy. The Komoka-Kilworth Urban Area can accommodate population projections allocated to the Township in the County Official Plan on full municipal services, as required by the County Plan.

The County Plan promotes communities that are diverse and have a sense of place with lifestyle choice and economic vitality in **Section 2.3.5** General Policies. The proposed Official Plan and Zoning By-law Amendments to allow residential development to meet demand for residential development on the subject lands strengthens sense of place and promotes economic vitality in a community designated for significant growth in the planning period. The proposed development in the Urban Settlement Area of Komoka-Kilworth conforms to policies in **Section 2.3.5**.

Section 2.3.7 Housing Policies in the County Plan encourages a wide variety of housing by type, size and tenure to meet projected demographic and market requirements of current and future residents of the County. The County Plan supports the proposed residential development within the Komoka-Kilworth Settlement Area, where an appropriate level of physical services is available. The County Plan also supports the provision of housing that is accessible to lower and moderate income households and adds to the variety of housing types, housing densities

and housing options to meet the needs of the Municipality's share of projected County residents.

Section 2.3.7.3 Intensification and Redevelopment, encourages residential intensification and redevelopment in areas designated for residential use at locations with the physical potential to accommodate residential intensification and have the physical services to support new households in the area and are physically compatible with the existing built form. The proposed amendments are appropriate as physical services are available and the proposal is compatible with the built form at this location. The proposed zoning regulations support the appropriate level of intensification. The proposed development conforms to the applicable policies in **Section 2.3.7.**

In **Section 2.3.8** Settlement Areas Urban Areas and Community Areas are identified as the focus for future growth including residential, commercial and industrial development. As previously stated, Komoka-Kilworth is a designated Urban Settlement Area in the Municipal Official Plan and has concentrations and intensity of different land uses. The Settlement Areas policy supports the proposed development in the Urban Area of Komoka-Kilworth to accommodate a significant portion of the projected growth in Middlesex Centre over the planning period. The proposed development conforms to the applicable policies in **Section 2.3.8.**

The proposed residential use is a permitted use in Settlement Urban Areas. Permitted uses are stated in **Section 3.2.4.1** Permitted Use Urban Areas. Direction to local Municipalities includes providing a variety of housing types.

The proposed amendment to the municipal Official Plan and Zoning By-law to permit the proposed development is in conformity with the Growth Management and Urban Areas policies in the Middlesex County Official Plan. No Official Plan Amendment is required to the County of Middlesex Official Plan.

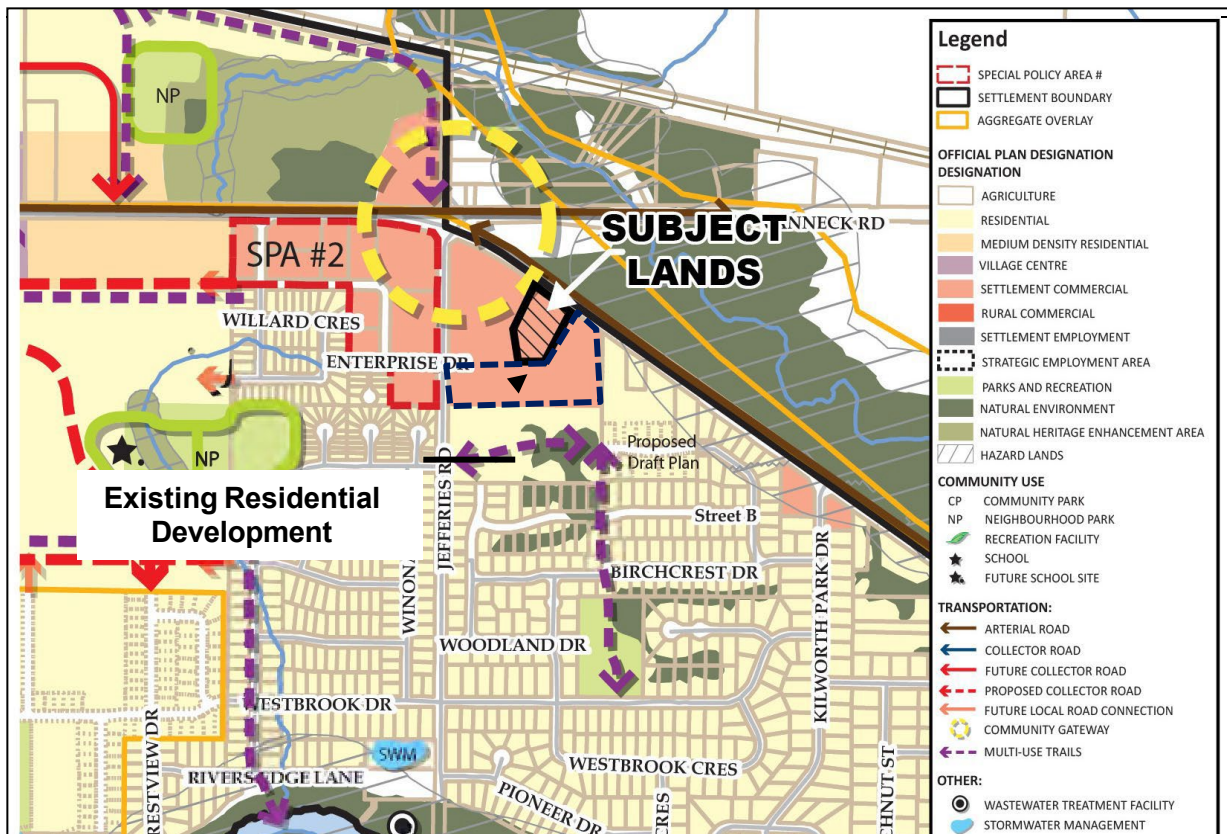
5.3 MIDDLESEX CENTRE OFFICIAL PLAN

The Middlesex Centre Council adopted Official Plan Amendment No. 59 after a comprehensive review of the 2018 office consolidated Middlesex Centre Official Plan. This plan was forwarded to the County of Middlesex for review and final adoption. The Ministry of Municipal Affairs and Housing (MMAH) then suspended the timeline for the planning review process. As a result, approval of the Middlesex Centre Official Plan is on-hold until further notification is received. The July 2018 Office Consolidation of the Middlesex Centre Official Plan has been used throughout this report, with consideration of the Middlesex Centre Official Plan REDLINE

adopted by Council May 18th, 2022.

The subject lands are currently within the “Settlement Commercial” land use designation, on Schedule ‘A-2’ - Komoka-Kilworth Secondary Plan to the Middlesex Centre Official Plan (Figure 11). This designation does not contemplate the proposed residential land use. Lands surrounding the subject lands are existing, recently built up low-density residential development. We are advised by municipal staff that this development was approved during the time the Middlesex Centre Official Plan was updated (OPA #28).

Figure 11 – Middlesex Centre OP Schedule A-2 – Komoka-Kilworth Secondary Plan (Excerpt)



General Residential Policies encourage a wide variety of housing types, sizes and tenures, supports intensification in settlements areas with municipal services, high quality design and affordable housing

5.2.1 General Residential Policy

The following policy relates to lands designated Residential within Urban and Community Settlement Areas of the Municipality, as well as to residential development within Hamlets.

a) The Municipality will provide and encourage a wide variety of housing types, sizes and tenures to meet demographic and market requirements for the Municipality's current and future residents.

e) The Municipality shall support opportunities to increase the supply of housing through intensification, while considering issues of municipal service capacity, transportation issues, and potential environmental considerations. Specifically, the Municipality shall require that 15 percent of all development occur by way of intensification.

f) Residential development including intensification should reflect a high quality of residential and neighbourhood design, in keeping with the design policies included in Section 6.0 of this Plan and having regard for the Municipality's Site Plan Manual and Urban Design Guidelines.

g) The Municipality shall encourage housing accessible to lower and moderate-income households. In this regard the County of Middlesex through its Official Plan will require that 20 percent of all housing be affordable.

The proposal is within the settlement area of Kilworth, a predominantly single detached dwelling community. The proposal adds medium density housing, a more affordable housing option, to the housing mix. Full municipal services are available, and there are no hazards on the lands. The proposal is a logical extension to an established residential community. The preliminary concept contemplates a development of contemporary designed buildings. Details regarding design and site plan considerations can be refined during site plan approval review. The proposal is generally in conformity with the General Residential policies.

The following goals and policies apply to the Komoka-Kilworth Secondary Plan area. Generally, the goals and policies provide direction for the provision of a diversity of housing to provide choices and types of housing that are more affordable than the predominant single detached housing in the area.

5.7.1 Komoka-Kilworth Secondary Plan Goals

- b) To plan for a community of all ages by providing a diversity of housing choice and affordability and providing community and recreational services to match population needs;*
- c) To provide for additional housing and employment and address urban land requirements for these uses in the Municipality through intensification of existing developed areas and compact land use in new development areas*
- f) To provide for an appropriate range and mix of housing types and densities;*
- i) To require full municipal services and direct new development in accordance with the servicing strategy for the area;*

5.7.2 Land Use Plan

- a) Future land use and development proposals, as well as public works and other municipal projects, shall contribute to the establishment of a balanced, mixed use community with a new village centre, a mix of housing types and densities distributed among residential and medium density residential areas, a strategic employment area, community gateways, schools and community facilities, a connected network of multi-use trails and a linked parks and open space system, based on Schedule A-2.*
- c) The pattern of development is based on a distinction between private lands and the public realm. The public realm is composed of clearly defined and connected streets, parks and open spaces and multi-use trails and Schedule A-2 recognizes the need to plan for these public spaces. Development shall provide landscaping adjacent to the street or sidewalk to promote an attractive landscaped transition between the public and private realm.*

5.7.4 Komoka-Kilworth Residential Area Policies

- a) The types of housing, density of development and targeted housing mix within the Residential and Medium Density Residential designations on Schedule A-2 are as follows:*

Use	Housing Mix Targets	Net Density (units per ha)
Low density residential (e.g. singles, semis)	60%	less than 20
Medium density residential (e.g. townhouses)	40%	20 to 50

The net density refers to the land area to be used for housing as well as the abutting local streets, but does not include major streets and other residentially associated land uses. Notwithstanding the housing mix targets and net density provisions, multiple dwellings shall be permitted in the Residential designation in accordance with Section 5.2.3.

The proposed Official Plan and Zoning By-law amendments facilitate development that provides housing choice and housing affordability. The proposed designation adds to the supply of residential land to provide for a mix of medium density housing types in a developing area. Development will proceed on full municipal services. The proposed amendments facilitate the development of medium density housing to meet the housing mix targets.

Sixty four (64) dwelling units are proposed in a defined area of 1.089 ha. The proposed net density is 60uph in the defined area. The subject lands have the dimensions to accommodate the proposed buildings, parking and driveways, landscape and amenity areas, and appropriate separation from Glendon Drive and abutting residences. The proposal conforms to the Komoka-Kilworth Secondary Plan Goals and policies. The proposed density is higher than what is normally permitted within the Medium Density Residential designation; however, through the Official Plan Amendment, we would seek to add a special policy for the subject lands to permit a minor increase in density from the permitted 50uph to the proposed 60uph.

Specific policies for multiple dwellings in **Section 5.2.3** provide location, density and compatibility criteria.

5.2.3 Policies For Multiple Dwellings in Residential Areas

Multiple dwellings, including fourplexes, townhouses and low/medium rise apartments shall be subject to the following policies:

- a) Locations should be proximate to adequate open space or park areas, schools, or Village Centre areas where possible.*
- b) Densities proposed should be generally compatible with adjacent densities when proposed adjacent to or within existing residential areas. For apartment dwellings, locations should be in close proximity to a major roadway, or roadway suitable for carrying higher than average volumes of traffic.*
- c) For apartment dwellings, locations should be in close proximity to a major roadway, or roadway suitable for carrying higher than average volumes of traffic.*
- e) Notwithstanding Subsection (d) above, the siting of multiple dwellings adjacent to or in close proximity to Village Centres, is encouraged.*
- f) Townhouses and apartments shall be subject to the site plan approval requirements of Section 41 of the Planning Act, and Section 10.5 of this Plan and having regard for the Municipality's Site Plan Manual and Urban Design Guidelines.*

The subject lands are adjacent to an evolving Settlement Commercial Area. Special policies also allow uses permitted in the Settlement Employment designation. Kilworth Park is located within walking distance and services are provided in the Settlement Commercial area such as child care and other personal services. The proposed density is appropriate for the site as previously stated and the proposal has nearby access to Glendon Drive, a major road. The proposed development is clustered adjacent to an existing townhouse development. The scale of these developments is appropriate for the location. The proposal is subject to site plan approval where details regarding facilities and servicing, access, off-street parking, accessibility for persons with disabilities, lighting, landscaping, and other matters are reviewed. The proposal conforms to policies for multiple dwellings.

The Komoka-Kilworth Secondary Plan servicing policies require full municipal services.

5.7.11 Komoka-Kilworth Servicing Policies

b) For the purposes of this section, the term “services” includes: linear sanitary sewage collection system; sanitary treatment facilities, storm water management, water distribution and treatment.

c) Full municipal services shall be required for all land use and development proposals that require services within the Komoka-Kilworth Urban Settlement Area and Secondary Plan.

Full municipal services are available for the proposed development as described in the servicing report prepared in support of this proposal. The proposed amendments to facilitate development conform to the Komoka-Kilworth servicing policies.

Amendments to the Official Plan must satisfy the criteria found in Section 10.1 Amendments to This Official Plan.

10.1 AMENDMENTS TO THIS OFFICIAL PLAN

This Official Plan may be amended by the Municipality upon consideration of all relevant issues relating to the public interest. The Municipality shall give consideration to all applications to amend its Official Plan, and shall notify the general public and various agencies and Ministries of the nature of the proposed amendment in accordance with the notice requirements of the Planning Act. Applications to amend this Official Plan shall be considered by the Municipality using the following criteria as a minimum:

- a) Does the proposed amendment relate, and conform to the vision for the Municipality of Middlesex Centre?*
- b) Is there a demonstrated need or justification for the proposed change?*
- c) Is the amendment in keeping with Provincial and County policy?*
- d) What are the effects of the proposed change on the demand for Municipal services, infrastructure and facilities?*
- 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?*
- 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?*

Middlesex Centre is a rapidly growing community and the community of Kilworth is one of the designated growth areas in the County and Municipal Official Plans. Among the strategic priorities in the Municipal Strategic Plan is “Diversifying future residential development” with the desired outcome statement “Middlesex Centre is a multi-generational, sustainable community committed to fulfilling the needs of youth, young families, and seniors.” Single-detached housing is the predominant form of housing in the Kilworth community. The proposed amendment relates to the strategic plan priority of providing housing, including housing for young families and seniors. The proposed Official Plan Amendment relates to and conforms to the relevant vision for residential development in the Municipality by adding to the variety of housing and housing

price points in the Kilworth community.

There is a need for the proposed form of housing. There are relatively few medium density housing developments in Kilworth, and few opportunities for additional medium density development in the near future. The proposed development adds important forms of medium density housing to the housing mix. The proposed development is also consistent with the Province's recent legislation 'The More Homes Built Faster Act, 2022 (Bill 23)' to support Ontario's newest "Housing Supply Action Plan". The government has a more long-term strategy to increase housing supply and provide attainable housing options for Ontario residents.

The proposal is consistent with Provincial Policy and in conformity with the applicable policies in the County of Middlesex Official Plan. Consistency with Provincial Policy and conformity to the County Plan has been demonstrated.

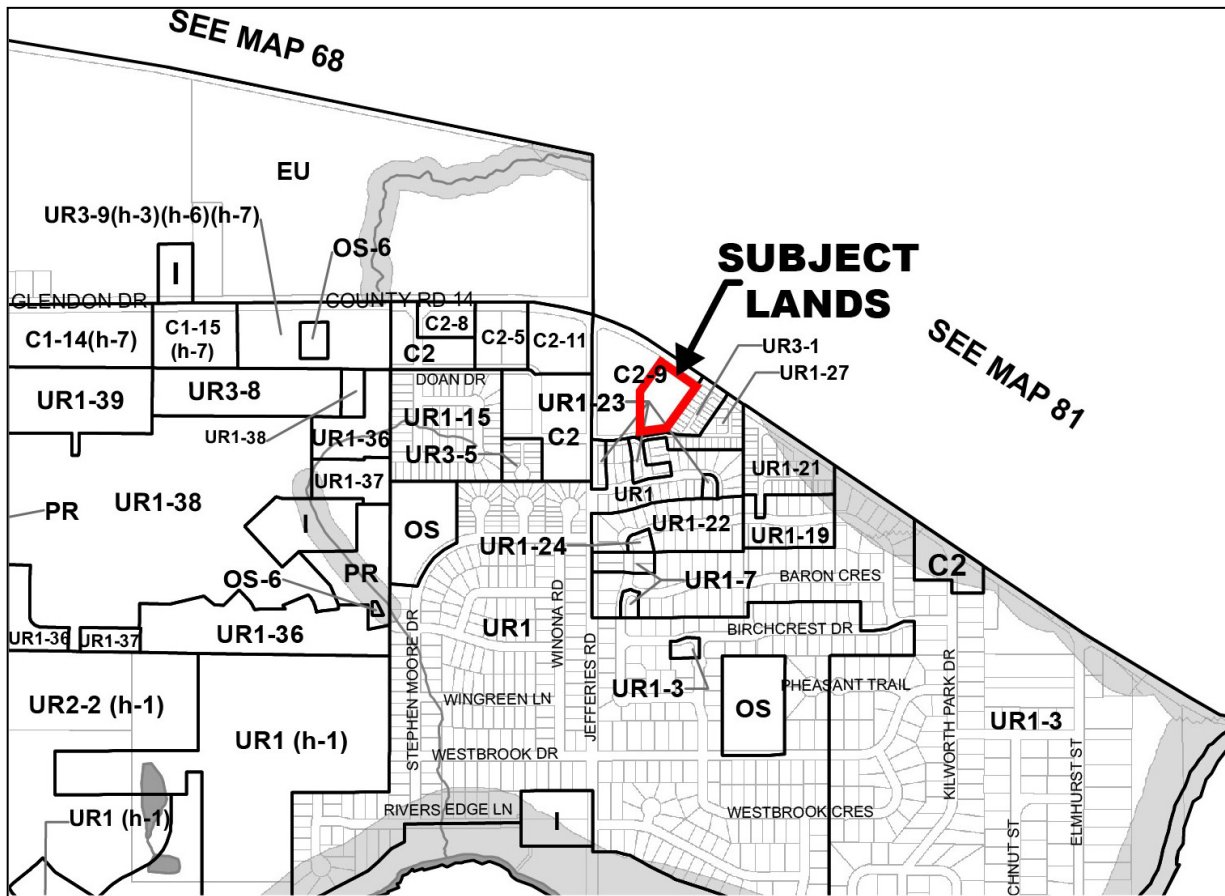
To the best of our knowledge the Kilworth community is adequately served by emergency and other public services. No extensions are required to municipal infrastructure.

The proposed development is not anticipated to have adverse impacts on surrounding land uses and residences. The proposal supports commercial development in the area. There are no cultural or natural heritage features on or adjacent to the subject lands.

5.4 MIDDLESEX CENTRE ZONING BY-LAW

The subject lands are currently zoned “Highway Commercial (C2-9)” in the Middlesex Centre Zoning By-Law (Figure 12). In order to permit the proposed residential development, a Zoning By-law Amendment is required to rezone the lands to an “Urban Residential Third Density (UR3)” zone to implement the proposed Official Plan Amendment.

Figure 12 – Middlesex Centre Zoning By-Law Map (Excerpt)



Permitted uses within the proposed UR3 zone are as follows:

- Accessory use
- Apartment dwelling
- Multiple unit dwelling
- Street townhouse dwelling
- Townhouse dwelling

The proposed ZBA seeks to permit the following provisions and regulations for the subject lands:

Regulations	Required UR3	Proposed
Min. Lot Area	(a) street townhouse: 250.0 m ² (2,691 ft ²) (b) apartment dwelling: 250.0 m ² (2,691 ft ²) for each of the first four (4) dwelling units and 100.0 m ² (1,076 ft ²) for each additional dwelling thereafter; → Minimum area required based on number of dwelling units = 0.87ha (8,700m ²)	1.089ha (10,889.0m ²)
Min. Lot Frontage*	(a) townhouse, apartment, or multiple unit dwelling: 30.0 m (98 ft) (b) street townhouse dwelling: 6.0 m (20 ft) for each dwelling unit on a separate lot	**a) 9.8m for entirety of the subject lands (b) N/A
Min. Lot Depth	35.0m	110.2m
*Min. Front Yard Setback (Dausett Dr.)	6.0m	6.0m
Min. Side yard Setback	3.0m	6.0m
Min. Rear Yard Setback (Glendon Dr.)	8.0m	8.0m
Min. Floor Area	(a) street townhouse dwelling, 65.0 m ² (700 ft ²) townhouse dwelling per dwelling unit (b) apartment, multiple unit dwelling 40.0 m ² (431 ft ²) per bachelor dwelling unit 55.0 m ² (592 ft ²) per one bedroom dwelling unit 65.0 m ² (700 ft ²) per two bedroom dwelling unit 85.0 m ² (915 ft ²) per three bedroom dwelling unit 85.0 m ² (915 ft ²) plus 9.0 m ² (97 ft ²) per each bedroom in excess of three (3) for dwelling units containing more than three (3) bedrooms	Street TH Dwelling = 65.0m ² . Apartment Dwelling = 40.0m ² - 85.0m ²
Max. Height	20.0m	13.5m
Max. Density	30 uph	**60 uph
Min. Outdoor Amenity	45m ² /dwelling unit	45m ² /dwelling unit
Max. Lot Coverage	35%	30%

*For the purposes of determining which street frontage constitutes the front yard, it is interpreted as Dausett Drive

** Exceptions

By way of this application the lands are proposed to be rezoned to an “*Urban Residential Third Density (UR3-())*” with exceptions.

The exceptions sought within the “*Urban Residential Third Density (UR3-())*” zone are as follows with further analysis below:

- Minimum lot frontage of 9.8m for the subject lands, whereas 30.0m is required; and,
- Maximum density of 60uph, whereas a maximum of 30uph is permitted.

Lot Frontage

The intent of minimum lot frontage is to provide adequate space for access to a public street. The proposed frontage of 9.8m supports the access on Dausett Drive and is sufficient space for servicing the development. Buildings are adequately setback from the front lot line.

Density

The intent of the maximum permitted density of 30uph, as per the “*Urban Residential Third Density (UR3)*” zone, is to ensure that the intensity of a proposed development can be appropriately accommodated on developable lands (i.e. including parking and amenity space).

The proposed Zoning By-Law Amendment seeks to establish a density of 60uph which includes sixty four (64) residential units on a land area of 1.089 ha. The proposed development provides adequate rear yards for the townhouse dwellings and a common amenity area for the low-rise apartment /stacked townhouses for amenity space. The lands also provide parking, a garage and driveway, for each standard townhouse unit, and 69 surface parking spaces for the proposed 44 unit low-rise apartment/stacked townhouse building. This provides a parking rate of approximately 1.5 spaces/ dwelling unit for the apartment building, and 2 spaces/dwelling unit for the proposed standard townhomes. The proposed density exceeds the normally permitted density in the “*Medium Density Residential*” land use designation, as noted earlier; however, it is a minor increase. The subject lands have sufficient dimensions and area to accommodate the proposed type and density of development.

The proposed Zoning By-Law Amendment to permit a sixty four (64) unit, residential development conforms to the policies of the proposed land use designation in the Middlesex Centre Official Plan. The proposed density conforms to the general policies in the County Official Plan and is consistent with the Provincial Policy Statement.

6.0 ADDITIONAL CONSIDERATIONS

6.1 GROWTH MANAGEMENT STRATEGY TECHNICAL REPORT (WATSON & ASSOCIATES)

The Growth Management Strategy Technical Report (Feb, 2022) was prepared by Watson & Associates in association with WSP in support of the Middlesex Centre Official Plan Review. This report concluded that the supply of urban residential lands in Komoka-Kilworth and Arva is sufficient to accommodate long-term housing demand over the next 25 years according to the Watson & Associates report.

The report also concluded that the commercial building space in Komoka-Kilworth and Ilderton relative to population is considered low (a low amount of commercial space per resident according to Watson & Associates) in comparison to similar sized communities. It is anticipated that Ilderton and Komoka-Kilworth will further expand their commercial bases, but will maintain a slightly lower per capita level by 2046, recognizing e-commerce trends. Recent commercial developments within the Settlement Area have included a new Foodland grocery-anchored plaza and a Home Hardware store (located on the same block as the subject lands). According to the Municipality of Middlesex Centre Strategic Plan, a key objective for the Municipality is the creation of an identifiable village centre (mix use centre) with a “traditional Main Street” in the Komoka area. A successful focal point of a community requires multiple functions. The Middlesex Wellness and Recreational Centre, situated in the vicinity of this area, will act as an important anchor to the Village Centre.

The Watson & Associates Growth Management Report also includes a residential land use analysis which summarizes the potential supply of housing units in draft approved and registered plans, plus intensification potential within the Urban Settlement Areas. Short-term housing demand has been derived from the 2021 to 2026 housing forecast. The analysis indicates that there is “just enough” total supply of potential housing units in registered and draft approved plans, and through intensification, to accommodate housing demand. It is noted, however, that the Municipality’s near-term supply of low-density housing is limited to two years.

The Watson & Associates report was prepared for the Middlesex Centre Official Plan update and provided sufficient analysis to provide the Municipality with broad understanding of land use trends and needs. The report states that further site-specific analysis would be required-hence the need for this additional, more site-specific land needs analysis.

Assumptions

According to the Growth Management Technical Report, approximately 14 net hectares (ha) of commercial designated land is required to support commercial growth for the planning period. The Municipality is described as having approximately 13 ha of vacant designated commercial lands, which is 1 ha short of the estimated commercial land demand within Komoka-Kilworth and Ilderton, as per the calculation below:

Commercial Land Requirements

Commercial Building Space Demand = 370,000ft² (3.4 ha)

Target Building Coverage = 25%

Commercial Land Demand: $(3.4 \div 0.25) = 14$ ha

Designated Commercial Vacant Land Supply = 13 ha

Designated Commercial Land Shortfall = 1 ha

Commercial lands within Komoka-Kilworth are anticipated to be sufficient over the next 25 years. To better understand the commercial land needs, Watson & Associates recommended that the Municipality prepare a commercial land needs study that would review the suitability of the commercial land supply to meet commercial demand. A commercial inventory is provided in Appendix 'A'.

The Watson report provides a generalized analysis. It assumes a coverage of 25% for commercial development and a commercial building space demand of 3.4 ha. It should be noted that the 25% coverage target does not take into account the movement in Komoka-Kilworth toward more efficient land use. Also, the generalized calculation of commercial land needs does not account for the re-use of existing vacant commercial building space. Therefore, the generalized numbers potentially overstate the need for additional commercial land during the planning period.

Moving forward, the Municipality is looking for more efficient use of land. Based on the analysis in Appendix 'A', the existing commercial land supply in Komoka-Kilworth is sufficient to support the commercial needs of residents. The suggested shortfall estimated in the Growth Management Report is not absolute. The removal of the subject lands from this commercial lands supply will not generate a shortfall. Based on appropriate lot coverage, as permitted in the Middlesex Centre Zoning By-law, future commercial lands should target a lot coverage which is higher than the 25% coverage target set in the Growth Management Report. There are sufficient available leasable and vacant lands throughout Komoka-Kilworth, which suggests a

relatively low demand for commercial land uses. Because of restricted access, the subject lands are not well-situated as Settlement Commercial lands; and removing these lands from the commercial lands inventory and using them for multi-family residential development is a more efficient use of land.

6.2 NOISE STUDY

A Noise Assessment Study was completed by Stantec. The result of the noise assessment concluded that predicted noise levels are above the Ministry of Environment Conservation and Parks (MECP) criteria at the living area of the townhouse dwellings with exposure on Glendon Drive (Units 37, 38 & 39). A 1.82m high noise wall is proposed at the rear of these units to mitigate traffic noise levels from Glendon Drive. The report also recommends noise warning clauses.

6.3 SERVICING BRIEF

A servicing design brief was completed by Stantec. All proposed units are to be serviced from an existing 525mm storm sewer and a 250mm watermain located on Dausett Drive. The servicing design brief established that there is reserve sanitary sewer capacity.

7.0 PUBLIC COMMENT RESPONSES

Throughout the application and consultation process, surrounding neighbours have been consulted with regard to the proposed development. There is a mix of residents who prefer residential development over commercial development, and others who prefer that the lands remain commercial. Below are comments which had been received by the Municipality up to the time this report was revised, with our responses as to how they have been addressed or will be addressed at a future stage.

- Public Comment: *Provide visitor parking to avoid on-street parking on Dausett Drive or in adjacent residential developments.*
 - Response: Visitor parking is to be provided where possible. A total of 64 spaces are provided for the stacked/apartment units and a total of 72 are required. A total of 32 spaces are provided for the standard townhouse units, whereas only 24 are required. The proposed development is required to provide a total of 96 parking spaces, and the proposed development is shown providing 96 spaces with room for designated visitor spaces.

- Public Comment: *Identify where snow piles will be located*
 - Response: Snow storage locations have not been confirmed, but will be identified through the site plan process. Several locations around the property, which are currently labelled “landscaped,” would provide for suitable snow storage pile locations during the winter months.
- Public Comment: *The entrance is too close to the existing driveway entrance for abutting lands. It may become a hazard especially in the winter. A single access is not enough for this development.*
 - Response: A single access is suitable for the size of this development. Based on restricted access from Glendon Drive, and, the notion of shared access between commercial and residential land uses being discouraged, the access on Daussett Drive would be the only suitable location for vehicular access.
- Public Comment: *Provide additional details regarding fencing and landscaping abutting the neighbouring properties.*
 - Response: The Concept Plan has been revised to reflect an increased landscaped buffer area between the proposed development and the existing dwellings to the east. Details of fencing and landscaping have been preliminarily evaluated and the locations and height of the proposed buffers will be suitable to screen the proposed development.
- Public Comment: *Concerns about the height of the stacked townhouses development if the top floor has a private outdoor amenity space. This may reduce privacy for residents in the neighbouring residential development.*
 - Response: The stacked townhouses/apartment building is located centrally on the property (closer to the commercial land use to the west). This was done to avoid compatibility and privacy issues from abutting residential development to the east. A buffer is provided by the 2-storey standard townhouses proposed on the property as well as the landscaped area on the easterly property line.
- Public Comment: *The density for the site is too high.*
 - Response: Based on best development practices, the need for varying housing forms and practicing efficient land use, the proposed development has an

appropriate number of units while still being able to accommodate sufficient parking, landscaped area separation and circulation.

- Public Comment: *The development would have an adverse effect on the farm land within the area and encroach on the sensitive wooded area.*
 - Response: The proposed development is located on land within an existing built-up area and surrounded by existing development. The lands are separated from wooded area to the north by Glendon Drive.
- Public Comment: *Concerns with the additional traffic at the Glendon Drive intersection*
 - Response: A traffic report was not required for the proposed OPA and ZBA submission. However, on a preliminary basis, the traffic will increase at Glendon and Jefferies, but based on the road classifications, these roads are designed to manage the increased residential traffic. Moreover, based on these applications, increased residential traffic will be offset by a reduction in the previously-planned commercial traffic.
- Public Comment: *Concerns about the lack of sidewalks.*
 - Response: The revised plan has shown sidewalks throughout the development which are to connect to the public sidewalk on Daussett Drive.

The proposed development has sought to address public comments and concerns throughout the planning process.

8.0 CONCLUSION

The proposed Official Plan Amendment and Zoning By-law Amendment satisfy the requirement of Section 10.1 Amendment to the Official Plan in the Middlesex Centre Official Plan. The proposal fits within the vision for housing and helps to fill a need to add to the mix of housing in the Kilworth Community. The proposed amendments are consistent with the relevant policies in the Provincial Policy Statement and conform to the relevant policies in the Middlesex County Official Plan. Finally, the proposal will not place undue demands on County and Municipal services. The proposed amendments to facilitate development represent good land use planning, and are in the community interest.

APPENDIX 'A'

Commercial Land Analysis

Glendon and Jefferies – Block 60

Komoka-Kilworth

Municipality of Middlesex Centre

Orange Rock Developments



May, 2022

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1.0 PURPOSE

Applications for an Official Plan Amendment and Zoning By-law Amendment were submitted in February, 2020 for land located at 22428 Jefferies Road in the Komoka-Kilworth Settlement Area (hereby known as the 'subject lands'). The subject lands are located on the southeast corner of Glendon Drive and Jefferies Road. The purpose of the submitted applications is removing a portion of the property from the available commercial supply and adding it to the Settlement Area's residential land supply.

The purpose of this Commercial Lands Analysis is to evaluate the Komoka-Kilworth Urban Settlement area and its inventory of existing viable commercial lands, and to determine whether the inventory is sufficient to support the commercial needs of the Komoka-Kilworth area.

This analysis has been undertaken in response to the Municipality's request for the applicant to provide supplementary justification for removing a portion of the subject lands from the area's commercial lands inventory.

2.0 DESCRIPTION / BACKGROUND

2.1 THE SUBJECT LANDS

The subject lands are located in Block 60 Plan 33M656, at the corner of Glendon Drive and Jefferies Road in the Municipality of Middlesex Centre. They have an irregular shape. A portion of the property has been developed for a Home Hardware Building Supply Store, and another portion was the subject of a recent Site Plan Amendment application for the construction of a medical/dental office and a restaurant. The subject lands make up the easterly portion of the property, with a frontage of approximately 9.8m (32.2ft) along Dausett Drive, and an area of approximately 1.09 ha (2.69 ac). The subject lands are currently vacant. Full municipal services are available. There are no significant cultural or archaeological features, and no man-made or natural hazards on the subject lands (Figure 1).

Figure 1: The Subject Lands



The subject lands are currently designated “Settlement Areas” (Urban and Community) in the Middlesex County Official Plan and “*Settlement Commercial*” in the Komoka-Kilworth Urban Settlement Area and Secondary Plan in the Municipality of Middlesex Centre Official Plan. They are zoned “*Highway Commercial (C2-9)*” in the Middlesex Centre Zoning By-Law 2005.

2.2 BACKGROUND

The existing designation of the subject lands does not contemplate the proposed residential land use and, therefore, there was a need for both an Official Plan Amendment and a Zoning By-law Amendment. The Municipality has undertaken an Official Plan review with several discussion documents, one of which is the Growth Management Technical Report (February 2022). The Growth Management Report is a broad analysis of land use needs within the entire Municipality of Middlesex Centre. In order to support the proposed Official Plan Amendment and Zoning By-law Amendment the Municipality requested the applicant to provide supplementary justification for removing a portion of these lands from the area’s commercial lands inventory and adding it to the residential land supply.

This Commercial Land Analysis report is intended to more specifically look at the commercial needs of Komoka-Kilworth using findings, assumptions and conclusions from the Watson & Associates Growth Management Report.

3.0 THE STUDY

This commercial analysis report is based on the finding of the Growth Management Technical Report prepared by Watson & Associates in association with WSP in February, 2022 in support of the Middlesex Centre Official Plan Review. The present study and report, however, focus more specifically on Komoka-Kilworth and its available commercial land supply.

3.1 COMMERCIAL CONTEXT

The vision of the Middlesex Centre Strategic Plan 2021-2046 is “a thriving, progressive and welcoming community that honours our rural roots and embraces our natural spaces.” The purpose of the *Settlement Commercial Area* designation within Komoka-Kilworth is to accommodate larger retail uses outside the Village Centres that require large sites for parking and access to major roads. Retail uses within the *Settlement Commercial Areas* include grocery stores, drug stores, hardware stores and commercial plazas¹. Komoka-Kilworth is a bedroom community with commercial land uses located throughout the community in order to provide residents with access to everyday needs. However, with the community’s proximity to London (approximately 10 minute drive), there is easy access to a wider variety, larger, and higher-order commercial uses.

3.2 GROWTH MANAGEMENT STRATEGY TECHNICAL REPORT (WATSON & ASSOCIATES)

The Growth Management Strategy Technical Report (Feb, 2022) was prepared by Watson & Associates in association with WSP in support of the Middlesex Centre Official Plan Review. This report concluded that the supply of urban residential lands in Komoka-Kilworth and Arva are sufficient to accommodate long-term housing demand over the next 25 years according to the Watson & Associates report.

The report also concluded that the commercial building space in Komoka-Kilworth and Ilderton relative to population is considered low (a low amount of commercial space per resident according to Watson & Associates) in comparison to similar sized communities. It is anticipated that Ilderton and Komoka-Kilworth will further expand their commercial bases, but will maintain a slightly lower per capita level by 2046, recognizing e-commerce trends. Recent commercial developments within the Settlement Area have included a new Foodland grocery-

¹ Growth Management Strategy Technical Report (Feb 2022), Watson & Associates, in association with WSP

anchored plaza and a Home Hardware store (located on the same block as the subject lands). According to the Municipality of Middlesex Centre Strategic Plan, a key objective for the Municipality is the creation of an identifiable village centre (mix use centre) with a “traditional Main Street” in the Komoka area. A successful focal point of a community requires multiple functions. The recently built, Middlesex Wellness and Recreational Centre situated in the vicinity of this area will act as an important anchor to the Village Centre.

The Watson & Associates Growth Management Report also includes a residential land use analysis which summarizes the potential supply of housing units in draft approved and registered plans, plus intensification potential within the Urban Settlement Areas. Short-term housing demand has been derived from the 2021 to 2026 housing forecast. The analysis indicates that there is “just enough” total supply of potential housing units in registered and draft approved plans, and through intensification, to accommodate housing demand. It is noted, however, that the Municipality’s near-term supply of low-density housing is limited to two years.

The Watson & Associates report was prepared for the Middlesex Centre Official Plan update and provided sufficient analysis to provide the Municipality with broad understanding of land use trends and needs. The report states that further site-specific analysis would be required—hence the need for this additional, more site-specific land needs analysis.

3.2.1 Assumptions

According to the Growth Management Technical Report, approximately 14 net hectares (ha) of commercial designated land is required to support commercial growth for the planning period. The Municipality is described as having approximately 13 ha of vacant designated commercial lands, which is 1 ha short of the estimated commercial land demand within Komoka-Kilworth and Ilderton, as per the calculation below:

Commercial Land Requirements

Commercial Building Space Demand = 370,000ft² (3.4 ha)

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Commercial lands within Komoka-Kilworth are anticipated to be sufficient over the next 25 years. To better understand the commercial land needs, Watson & Associates recommended that the Municipality prepare a commercial land needs study that would review the suitability of the commercial land supply to meet commercial demand.

The Watson report provides a generalized analysis. It assumes a coverage of 25% for commercial development and a commercial building space demand of 3.4 ha. It should be noted that the 25% coverage target does not take into account the movement in Komoka-Kilworth toward more efficient land use. Also, the generalized calculation of commercial land needs does not account for the re-use of existing vacant commercial building space. Therefore, the generalized numbers potentially overstate the need for additional commercial land during the planning period.

3.3 COMMERCIAL INVENTORY

The existing designated commercial land supply available in the Komoka-Kilworth Settlement Area is shown on Schedule A-2 Komoka-Kilworth Urban Settlement Area and Secondary Plan.

Lands abutting the subject lands on, Block 60, are proposed to remain within the “Settlement Commercial” land use designation. These lands are currently under applications for a medical/dental building and restaurant, and have recently been developed for a Home Hardware store. Lands across from the subject lands on the west side of Jefferies Road are designated “Settlement Commercial” (same as the subject lands), as well as lands on the northwest corner of the intersection of Glendon and Jefferies. Commercial space is available further west on Glendon Drive at the intersection of Komoka Road. The broader market of London and Strathroy provides an abundance of higher order commercial uses which also serve the local population.

The chart below highlights the existing and available commercial lands supply in Komoka-Kilworth. Locations of the inventoried lands are shown in Figures 3 and 4:

No.	Location	OP Designation	Zoning	Commercial Lands		Available Commercial Space/Existing Use
				BUILT	VACANT	
1	10293 Glendon Dr, Komoka (Kilworth Heights West)	Village Centre	C1-14, C1-15 (h-7)		3.22ha and 0.69 ha commercial blocks	Vacant Land
2	North Corner of Glendon Drive and Tunks Lane (1048 & 10166 Glendon Drive)	Village Centre	C1-11, C1-12	3.33 ha		Occupied: Grocery Store/mixed use Vacant Building Area: Unit 201 = ~134m ²
3	10178, 10190, 10194, 10246 Glendon Drive and part of CON 2 S PT LOT 7	Village Centre	EU and I		4.7 ha	Vacant Land: Currently contains 3 single detached dwellings and Presbyterian Church
4	CON 2 S PT LOT 6 AND PLAN MRD144 PT PART 1	Village Centre	EU		5.1 ha	Vacant Land
5	171 Tunks Lane	Village Centre	EU	3.0 ha		Occupied: Hoskin Feed and Country Store
6	10082 Glendon Drive	Village Centre	EU		1.5 ha	Vacant Land
7	101 Ontario Ave, 22568 Komoka Road and 102 Railway Ave	Village Centre	C1, I-7, I	0.57 ha		Occupied: Kids Ko Childcare Centre and 2 single-detached dwellings
8	100 Huron Avenue	Village Centre	C1	0.62 ha		Occupied: A 1 Restoration
9	East Side of Komoka Road between Huron Avenue and Simcoe Avenue	Village Centre	C1	1.4 ha		Occupied: single-detached dwellings, Oxbow Audio Lab, Simple Concrete Solutions, Push Rod Garage
10	West side of Komoka Road between Hamilton Street and north portion of CNR Railway	Village Centre	C1, C1-16, I	1.32 ha	0.38 ha	Vacant Land: 0.38 ha Occupied: single-detached dwellings, Moirs Skate Shop, D'Lux Auto Spa, Canada Post, ACC Motorwerks, The Kitchen Powered by Pierogi Queen, Pharmasave
11	9919 Glendon Drive	Settlement Commercial	C2	0.78 ha		Occupied: Restaurant, Gas Bar, Convenience Store
12	9909 Glendon Drive (commercial with 3 detached buildings)	Settlement Commercial	C2-12	0.79 ha		Occupied: Restaurant, Dentistry, Wellness, clinic
13	9930 & 9918 Glendon Drive	Settlement Commercial	C2-16	0.70 ha		Occupied: Animal Clinic, Gas Bar, Convenience Store Vacant Building Area: Medical/Office Building under construction (4,650 ft ² / 432 m ²)

14	9952 Komoka Road	Settlement Commercial	C2-3	0.53 ha		Occupied: Restaurant, Cannabis, Clinic, Pharmacy
15	9964, 9990,9998,10006 Glendon Drive and 56,55 Delaware Street	Settlement Commercial	C2		0.9 ha	Available Land and Building: Contain single-detached dwellings on 6 residential lots, but zoned and designated for commercial use
16	22428 Jefferies Road	Settlement Commercial	C2-9	1.39 ha		Occupied: Home Hardware
					0.69 ha	Vacant Land: Awaiting Site Plan Approval
					1.089 ha	Subject Lands: Subject to OPA/ZBA
17	LOBO CON 2 S PT LOTS 7 AND 8	Settlement Commercial	EU		2.7 ha	Vacant Land: 'Settlement Commercial' lands
18	22499 Jefferies Road (Kilworth Business Park)	Settlement Commercial	C2-11	1.41 ha		Occupied: Multiple Businesses Vacant Building: Building under construction abutting Glendon Drive (15,210ft ² / 1,413 m ²)
19	35 & 39 Doan Drive	Settlement Commercial	C2-5	0.60 ha	0.60 ha	Occupied: My Storage Space Vacant Land: 39 Doune Drive
20	9 Springfield Way	Settlement Commercial	C2-8		0.59 ha	Vacant Land
21	15,10 & 55 Springfield Way	Settlement Commercial	C2	0.60 ha & 0.49 ha		Occupied: RSP Motorsports, Rob Clarke Automotive
TOTAL COMMERCIAL LANDS				17.5 ha	21.2 ha	38.7 ha
				BUILT	VACANT	TOTAL
VACANT COMMERCIAL BUILDING SPACE						1,979 m ²
						TOTAL

Figure 3: Commercial Land Supply (1-15)

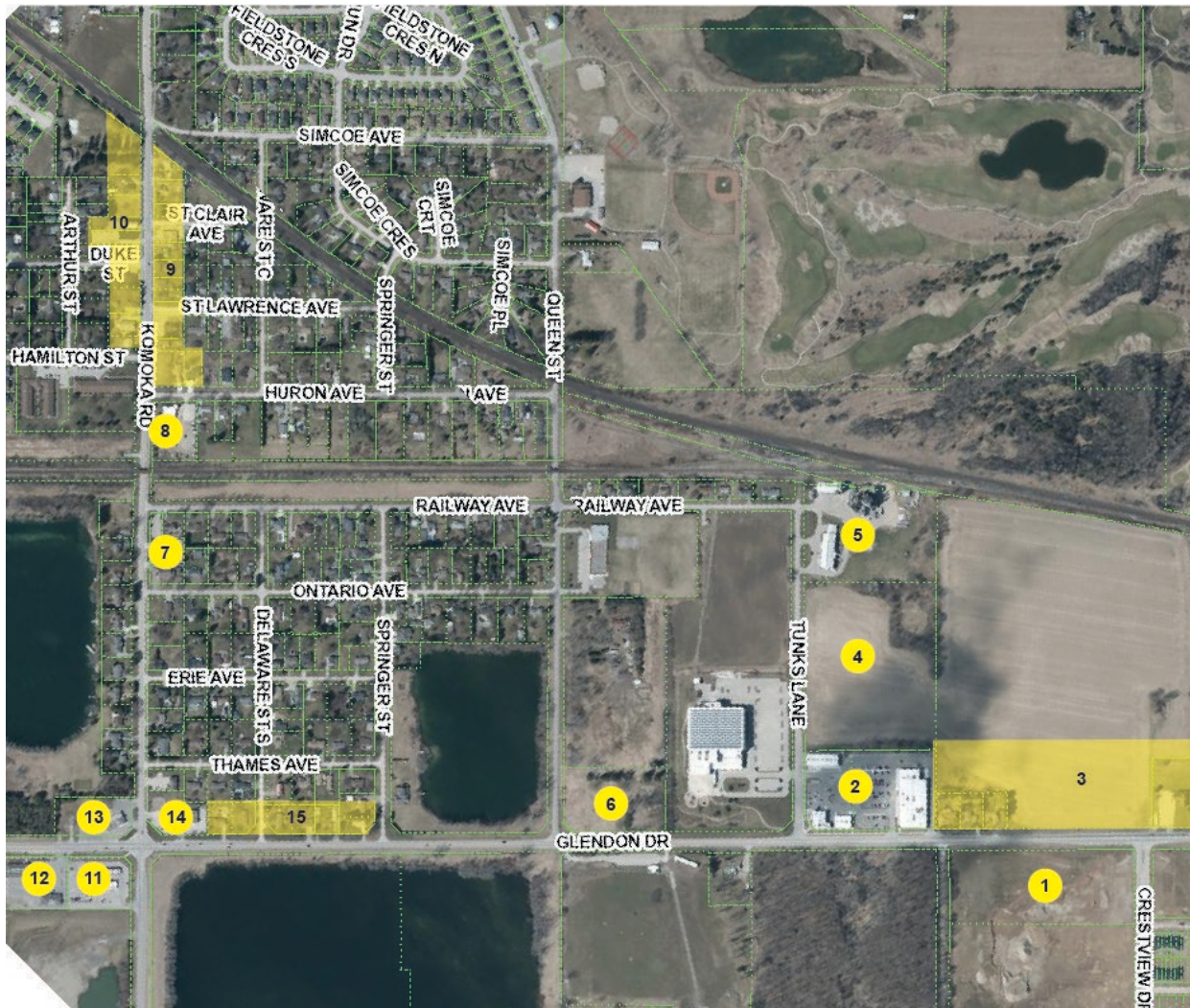
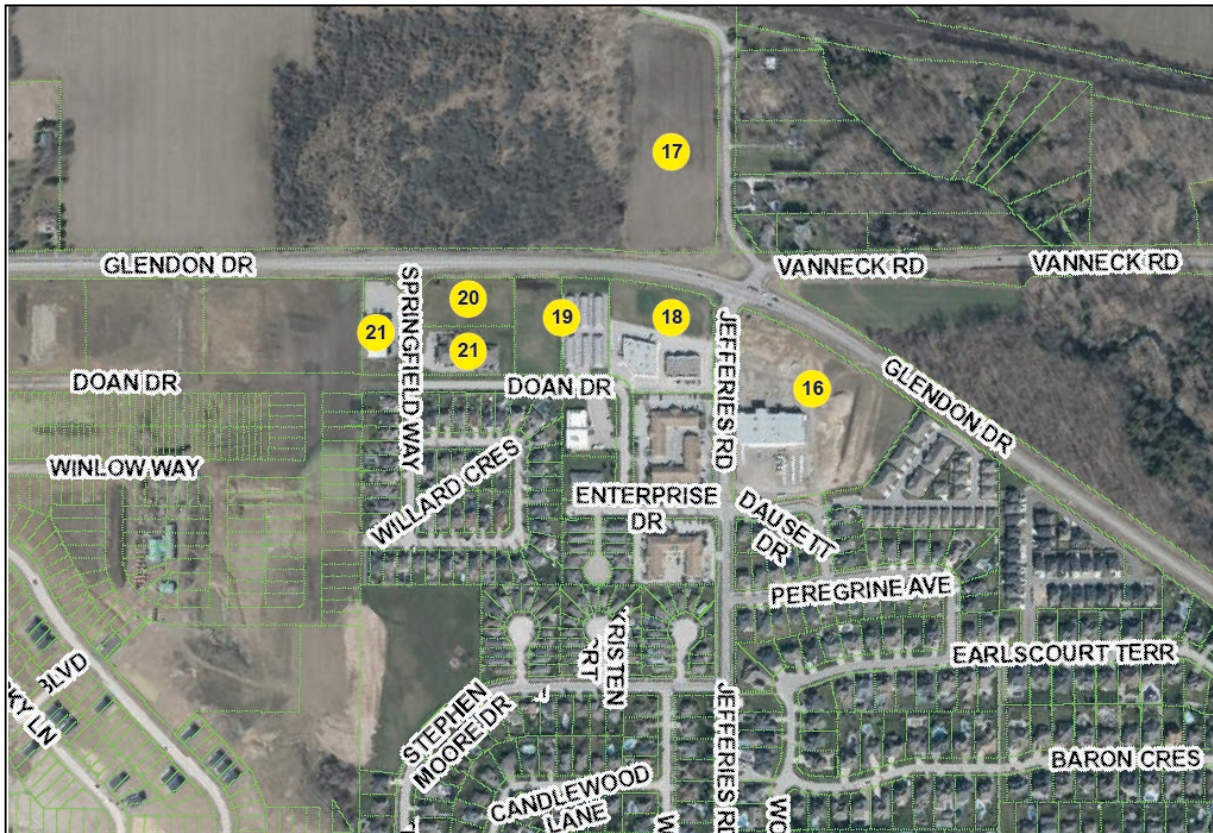


Figure 4: Commercial Land Supply (16-21)



4.0 ANALYSIS

The commercial lands located within the settlement area of Komoka-Kilworth found in the above table consist of both occupied and vacant commercial lands which could be developed, re-developed and/or used for the commercial needs of the residents of Komoka-Kilworth. They include “Settlement Commercial” and “Village Centre” lands which have similar permitted uses for the purpose of meeting the commercial needs of the residents of Komoka-Kilworth. The table in Section 3.3 of this report shows a total commercial inventory of 39.5 ha, with approximately 21.2 ha being vacant, available commercial lands and existing occupied lands of approximately 17.5 ha. The chart also lists vacant existing buildings. The 1.089 ha subject lands are listed as part of the vacant commercial lands inventory. The inventory shows a 21.2 ha supply of vacant commercial lands which is well above the 14 ha estimated need for the planning period noted in the Watson Report.

In addition to the above, “Settlement Employment” and “Rural Commercial” designations permit a variety of commercial uses which may supplement the “Settlement Commercial” and “Village Centre” lands.

The Watson report notes that Komoka-Kilworth will further expand their commercial base but maintain a slightly lower per capita level by 2046, recognizing e-commerce trends². There are vacant commercial buildings within Komoka-Kilworth as per the table above and site visit observations of properties within the Village Centre, and Settlement Employment designated properties within the Settlement Area. The subject lands are not a priority location for “Settlement Commercial” uses which require access to major roads. Because of access restrictions on Glendon Drive and the configuration of the property, the subject lands can not be considered prime commercial lands. The large Home Hardware on the property and two proposed commercial uses in front of the existing store have more immediate access to the already-indirect entry from Jefferies Road.

The Watson & Associates Growth Management Technical Report provided information related to Komoka-Kilworth’s commercial land needs, which has been the basis of this Commercial Land Analysis Report. The Watson report identifies a commercial land shortfall of 1 ha within the Settlement Area, but the report did not have access to a detailed inventory as provided here.

² Growth Management Strategy Technical Report (Feb 2022), Watson & Associates, in association with WSP

Moreover, the Watson calculation is based on the assumption of 25% lot coverage, which does not support the direction of the Middlesex Centre Official Plan (Section 5.1.4) and the Middlesex Centre Zoning By-law. Lot coverage in the 'Highway Commercial Zone (C2)' is permitted at a maximum of 35%. Through our analysis, we maintained the Commercial Building Space Demand Calculation from the Watson & Associates Growth Management Technical Report 3.4 ha. However, if we were to use the 35% coverage allowed in the Zoning By-law, the resulting calculation would be $3.4 \text{ ha} \div 0.35$ (35% coverage) = approximately 10 ha of commercial lands needed for future commercial use. The target building coverage of the Watson report can be considered to underestimate the maximum lot coverage potential of future and existing commercial developments. A 35% lot coverage, as is permitted, better represents the development potential for commercial lands. For example, the 10293 Glendon Drive site projects a commercial building coverage of approximately 33%.

However, even a modest movement in the target coverage from 25% to 28% would result in an estimated commercial land need of $(3.4 \div 0.28)$ = approximately 12 ha.

With a 10 ha commercial land need calculation, or even a 12 ha need calculation, for Komoka-Kilworth, the Settlement Area has more than enough commercial lands inventory to meet the commercial needs of the community. The numbers used in the Watson report are not absolute and are subject to adjustment based on more efficient land use trends.

The inventory also lists vacant built commercial space totaling 1,979 m², which, based on the Watson 25% formula, represents the equivalent of 0.77 ha of commercial land inventory. Taking this into account, even without changing the Watson report 25% coverage target, the need for additional vacant commercial lands is reduced from 14 ha to 13.2 ha.

New commercial development and mixed use is encouraged to be within the village centres as stated in the Watson Growth Management Report. Uses permitted in the "Village Centre" designation include convenience retail, personal services, offices uses, restaurants, hotels and entertainment and recreational facilities that are compatible in terms of scale and function with the village centre. Generally, Village Centres are intended to accommodate the majority of commercial and institutional services in the settlement areas. The "Settlement Commercial" designation is not intended to be the focus or the principal location for new commercial development. The subject lands, which we are proposing to remove from the commercial lands inventory, are not even prime "Settlement Commercial" lands.

The existing commercial land use supply and potential future supply of commercial land uses to serve Komoka-Kilworth can be accommodated through the Settlement Commercial and Village Centre land use designations in the Middlesex Centre Official Plan. The conversion of the subject lands supports a mix of land uses at a community gateway and provides for a more logical and efficient use of land. Based on our letter submitted when the application was last brought in front of Council, limiting access to Jefferies Road as a result of the County prohibiting access to Glendon Drive, remains a deterrent to future commercial development on the site and does not support an efficient use of land for the purpose of "Settlement Commercial" land use. As a result of this analysis, we are of the opinion that there is no need for the subject lands to be retained for future commercial purposes.

5.0 CONCLUSION

This report provides a detailed inventory of commercial lands for the Komoka-Kilworth Settlement Area, which information was not available through the Official Plan Review process, and was not previously available to assist Municipal Council and staff to properly assess the potential effect of removing the 1.089ha subject lands from the commercial lands available for development.

The information in this report demonstrates that, rather than there being a potential shortfall of 1ha as estimated by the Growth Management Report, there is currently more than adequate inventory of commercial lands, supplemented by existing vacant built inventory, to meet the commercial needs of the community's residents over the planning period.

Moreover, looking to more efficient use of land over the planning period, and based on appropriate lot coverage as permitted in the Middlesex Centre Zoning By-law, future commercial lands could reasonably target a lot coverage which is higher than the 25% coverage target set in the Growth Management Report, thus reducing the overall commercial land area needed.

Because of restricted access, the subject lands are not well-situated as Settlement Commercial lands; and removing these lands from the commercial lands inventory and using them for multi-family residential development is a more efficient use of land, and will not result in a shortfall in commercial land supply.