

From: Stewart Findlater [REDACTED]
Date: Monday, August 22, 2022 at 11:59 AM
To: Durk Vanderwerff <dvanderwerff@middlesex.ca>
Cc: Dan Fraleigh Real Estat [REDACTED]
Subject: 15194 Medway Road - Proposed Boundary Re-Allocation

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Mr. Vanderwerff,

As you are aware the Municipality of Middlesex Centre is completing its Official Plan five year review as required by the Planning Act. I submitted the attached package to Middlesex Centre on March 9 for consideration and the request was denied. I believe the request is appropriate given the constraints on developing the lands fronting onto Medway Road due to a large drain that bisects the property. The request would simply remove those lands from the Ballymote Settlement Area and add an equivalent amount (or perhaps even a little less area) of land along Highbury Avenue for the purpose of building a single unit detached dwelling.

I have had a discussion with the County's Director of Transportation and he indicated he had no concerns with access to the proposed new lot.

As the approval authority for the Official Plan update, I would ask that you consider making this one small amendment to the adopted Plan before final approval. I would appreciate acknowledgment of receipt of this document and to be kept informed of the ultimate decision on this request.

Thank you for your consideration and I look forward to hearing back from you. Should you have any questions please feel free to contact me at your convenience.

Stewart Findlater, MCIP, RPP
Findlater & Associates Inc.
30 Village Gate Crescent
Dorchester, Ontario N0L 1G3
[REDACTED]

On Wed, 22 Jun 2022 at 09:49, Rosanna Jefferies [REDACTED] wrote:

Durk Vanderwerff Director of Planning County of Middlesex 399 Ridout Street North London, ON N6A 2P1

Andrew and Rosanna Jefferies

13138 Ilderton Road

P.O. Box 308 Ilderton, Ontario
N0M 2A0 [REDACTED]

CC: Marion Cabral, Christopher Jefferies and the Clerk of Middlesex Centre

Mr. Vanderwerff,

We live at 13138 Ilderton Road, Ilderton, Ontario. We recently had a discussion with Marion Cabral of your Staff regarding our property. We were made aware that the property is not included in the Ilderton Urban Growth Boundary. We would therefore request that this be adjusted in the new Middlesex Centre Official Plan so that the property of 13138 Ilderton Road is included in the Ilderton Urban Growth Boundary. The size of the property is very close to one acre and is presently zoned as UR-1.

This is a very logical and proper request as the property is on all municipal services including, municipal water, municipal sanitary sewer, municipal storm sewer and all utilities including natural gas. This property is the only property zoned UR-1 that is outside of the Ilderton Urban Growth boundary, travelling west on Ilderton Road. Ms. Cabral made a very important point in our discussion that the property at 13138 Ilderton Rd. is not used for agricultural purposes now and in fact never will be.

In addition, a precedent has been set numerous times in the recent past with many, many lots in Ballymote and Bryanston being added to the urban growth boundaries in their respective villages.

Please advise us if this can/will be done.
Thank you for your consideration.

Andrew and Rosanna Jefferies

Developro Land Services Inc.

151 Devonshire Ave.
London, ON
N6C 2H9

Via Email Only

January 16, 2023

Middlesex County Administration Office
399 Ridout Street North
London, Ontario N6A 2P1

Attention: Mr. Durk Vanderwerff, MPA, MCIP, RPP, Director of Planning and Development

Re: Middlesex Centre OPA 59, 10036 Ilderton Road

I am providing this letter to you on behalf of Poplar Hill Villa Ltd. who owns the property located at 10036 Ilderton Road in the hamlet of Coldstream Poplar Hill.

As you are aware, the Municipality of Middlesex Centre undertook OPA 59 to review settlement boundaries, Coldstream Poplar Hill included. During that process, I provided numerous emails and a letter to Municipal Staff as part of the public participation process. I specifically requested to discuss with staff and/or the consultant my request to have the settlement boundary expanded to include the house at 10036 Ilderton Road (but not the farm fields associated with the house).

It is my understanding that staff diligently provided all my correspondence to the planning consultant charged with facilitating the overall OPA process. It is unfortunate that I was never contacted by the consultant through the process.

The inclusion of the house at 10036 Ilderton Road into the settlement boundary is a logical adjustment to make as it merely reflects the actual situation – that the house is in fact part of the hamlet, and should not be considered agricultural in nature. It does not affect the calculations with respect to accommodation of population growth in Middlesex Centre as no new development is contemplated.

I respectfully request that during the County of Middlesex's review of Middlesex Centre OPA 59 that my previously submitted emails and letters be considered in hopes of having the house at 10036 Ilderton Road be included into the settlement boundary.

I also request that I be kept informed regarding the status of your review and decisions with respect to the approval of Middlesex Centre OPA 59, thereby preserving the right to appeal on behalf of Poplar Hill Villa Ltd. as warranted.

Sincerely,

A handwritten signature in black ink, appearing to read 'Craig Linton', with a stylized flourish at the end.

Craig Linton
Developro Land Services Inc.
519-852-8307
craig@developro.ca

Cc: Marci Ivanic, Legislative Services Manager/Clerk, Middlesex County
Cc: Marion Cabral, Planner, Middlesex County
Cc: Dan Fitzgerald, Planner, Middlesex County
Cc: James Hutson, Municipal Clerk, Middlesex Centre
Cc: Margaret Anne Caughlin, Poplar Hill Villa Ltd.

From: George Sinker [REDACTED]

Sent: Tuesday, September 13, 2022 4:04 PM

To: Joel Robson [REDACTED]

Cc: Joseph Hentz [REDACTED]

Subject: Middlesex Centre OP Amendment 59 adopted May 22nd 2022

CAUTION: This email originated from outside of the Middlesex County email system. Please use caution when clicking links or opening attachments unless you recognize the sender and know the content is safe.

Good Morning Durk/Erin

This is further to our recent telephone conversation re: the above. As you know I have retired from the practice of law December 31st however I still have certain families whom I am providing Transition Planning services for and Advisory services in the areas of Planning ;zoning etc. I understand that the County will now be reviewing OP Amendment 59 and circulating same as required by law prior to County Approval/ amendment etc.

I have now had an opportunity to review the S 10.3 Severance Policies and in particular the S 10.3.2 policies which relate to Severances within Agricultural Areas.

This raises the following questions:

1. 10.3.1 d The Robson's have a potential Surplus dwelling consent application re: a property inherited from their late uncle which they would like to sever the surplus dwelling from and sell to a farming child in the next generation as has been their pattern with several other previous consents. Due to the high price of farmland it is prohibitive for this child to purchase the whole farm and would also put him "out of balance with the other children.

This house has a long lane way and the building envelope which has existed for 100 years dictates a flag shape surplus dwelling consent. I note that this is merely discouraged and not prohibited outside Settlement areas. Would the retention of a farming child by ownership of this dwelling be a suitable rationale for this consent as building envelopes are not always found square or rectangular in the real world.

10.3.2.1 c) Severances for Agricultural Uses

"Must be a minimum of approximately 40 hectares"

Does this mean if the client wished to sever a commercial grain elevator from a 40 hectare parcel that this may be doable or if I started out severing a Surplus dwelling from a 20 hectare parcel that the municipality would then as in the past just rezone the retained 19 ha. of land with a prohibition on constructing any residential dwelling.

10.3.2.1 f)

I. Is it still the case that I can own farm property in another municipality purchase a farm in Midd. Centre and have farm consolidation occur so that I may sever the surplus dwelling in Middlesex Centre.

10.3.2.1 f)ii

If the client lives off farm in a dwelling (not a severed house in the A1 zone) why does he/ she need to own an existing habitable dwelling on a farm property to qualify to apply to sever off the Surplus dwelling from the farm he just acquired for purposes of consolidation. Lots of farmers live in settlement areas and have no habitable dwellings on their farms as they do not want to be landlords.

10.3.2.1 c) Should environmental and topographic features be the only exceptions to "generally regular in shape". What about long established building envelopes. What does this hurt as long as the lot size is kept to a minimum. You are not removing land from agriculture. It has always been a lane.

10.3.2.1 viii

Does this still allow the remnant farm to be rezoned as a condition of consent even if less than 40 ha. As I note former f xii xiii has been removed.

10.3.2.1 f xii ii

This has been removed. If the farms are operated as one farm operation is it still correct that registered ownership of the farms need not be identical.

Since I am an owner of property in the County through my Corporation would you also treat this email as my personal concerns about OP 59 so that these issues become clarified prior to approval by the County if such is the case.

Yours truly

George Sinker

PS Erin would you please forward this to Durk as I do not have his email address.

Thanks

From: Harry Froussios [REDACTED]

Organization: Zelinka Priamo Ltd.

Reply-To: Harry Froussios [REDACTED]

Date: Tuesday, September 6, 2022 at 11:36 AM

To: Durk Vanderwerff <dvanderwerff@middlesex.ca>

Cc: [REDACTED], 'Marco'

Subject: Westhaven GC Lands (13 acres)

CAUTION: This email originated from outside of the Middlesex County email system. Please use caution when clicking links or opening attachments unless you recognize the sender and know the content is safe.

Good Morning Durk,

I hope you are doing well. We were just retained by the owners of the 13 ac parcel abutting Westhaven Golf Course to assist with the future development potential of these lands (see attached). Initially, can you please confirm the following:

- Receipt of the attached letter (pages 3-9), dated August 26, 2022
- Date that County Council will consider approval of OPA 59

Also, my clients would like to meet with you as soon as conveniently possible (in advance of Council approval) to discuss their plans for this property. Please advise of your availability for this week if possible.

If you have any questions, or require additional information, please do not hesitate to contact me.

Regards

Harry

Harry Froussios, BA, MCIP,
RPP Senior Associate

ZELINKA PRIAMO LTD.

A Professional Planning Practice

318 Wellington Road

London, ON N6C 4P4

T (519) 474-7137, ext. 226

F (519) 474-2284

C (519) 872-0941

www.zpplan.com

Please note: During the COVID-19 Pandemic I will be working full-time from home. I do not have access to my office phone but can be reached via my cell, and by email. Stay Healthy!

From: <noreply@middlesex.ca> on behalf of Middlesex County <noreply@middlesex.ca>
Reply-To: NoReply <noreply@middlesex.ca>
Date: Wednesday, September 7, 2022 at 1:17 AM
To: Durk Vanderwerff <dvanderwerff@middlesex.ca>
Subject: Webform submission from: Middlesex 2046 - Middlesex County Official Plan Update

Submitted on Wed, 09/07/2022 - 01:17 Submitted by: Anonymous
Submitted values are:

RECIPIENT

Durk Vanderwerff - Director of Planning - Middlesex County

YOUR NAME

Lorenzo Palumbo, Westhaven Inc. & S. Palumbo Construction Ltd.

E-MAIL

[REDACTED]

MUNICIPALITY

Middlesex Centre

MUNICIPAL ADDRESS

6896 Egremont Drive

SUBJECT

OPA Amendment No. 59 & approval of County Official Plan

REQUEST

Modify proposed Official Plan which deletes our property between two single-family residential neighbourhoods from the Settlement Boundary of Hamlet of Melrose. Please include these lands in compliance with existing zoning of UR3 - Urban RESidential Third Density which they have been zoned for 30 years. The 8 partners of West Haven Golf course which own this land were not aware of these proposed changes and based on planning and municipal legal advice believe these lands should not have been excluded. Thank-you

26 August 2022

200 Villagewalk Blvd – Suite 401
London, Ontario N6G 0W8

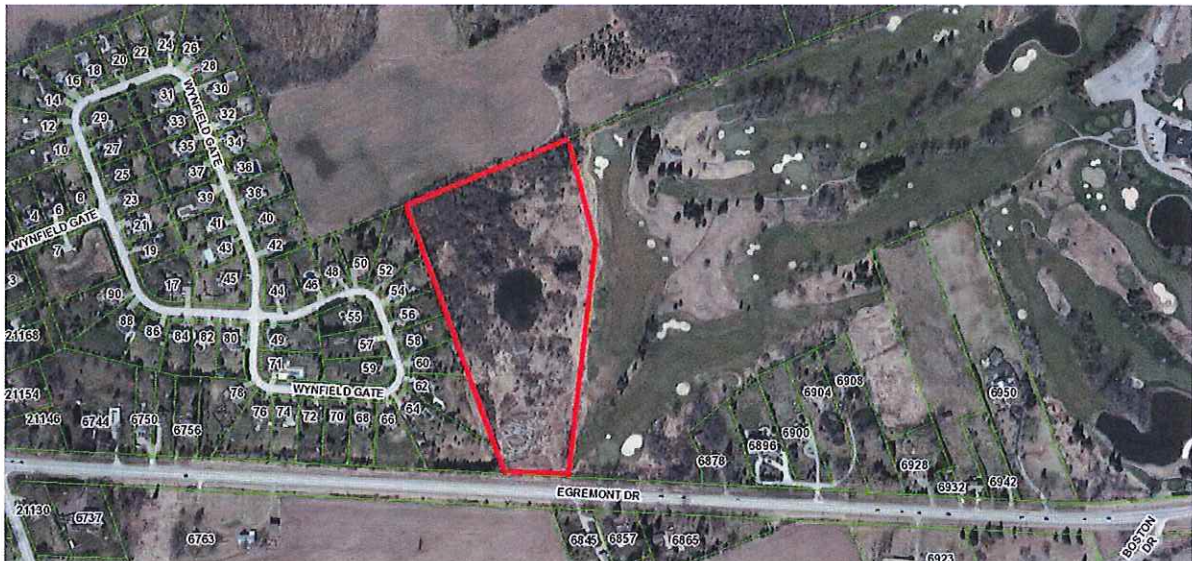
Mr. James Hutson,
Clerk,
Municipality of Middlesex Centre,
10227 Ilderton Road
Ilderton, Ontario, N0M 2A0

Attention: Mayor and Council

Subject: West Haven Inc./832928 Ontario Inc. (5.26 ha approx)
CON 5 S PT LOT 31 RP 33R11585 PART 1
Geographic Township of London
Municipality of Middlesex Centre

This letter pertains to the above-noted property of which I am a part owner and its designation under the recently adopted Amendment No. 59 to the Middlesex Centre Official Plan now under review at the County of Middlesex preparatory to formal adoption.

The lands are depicted on the mapping below.



These lands have been owned by West Haven Inc. for many years and are adjacent to the West Haven Golf and Country Club located immediately to the east although they have never been used for any purpose associated with the golf course. Prior to

amalgamation, the lands were within the Hamlet of Melrose under the London Township Official Plan and zoned to reflect a proposal at that time for a higher density golf course residential development. This was negotiated by myself with the Township of London and the zoning from that time continues to be reflected in the Middlesex Centre Zoning By-law per Map U-11 (attached) which includes the subject lands within Melrose and zones them as **Urban Reserve 3 (UR3)**. The UR3 zone regulations permit the following uses:

- accessory use
- apartment dwelling
- multiple unit dwelling
- street townhouse dwelling
- townhouse dwelling

I am now aware that Schedule A-11 to the Middlesex Centre Official Plan was amended in 2012 by OPA 28 to exclude the subject lands from the Hamlet Area of Melrose and to re-designate them to Agricultural. Most recently, Amendment No. 59 adopted by By-law No. 2022-051 to update the Middlesex Centre Official Plan would delete Schedules 'A' through 'D' and replace them with updated Schedules dated May 18, 2022 subject to the approval of the County of Middlesex. The West Haven Inc. lands would continue to be located outside of the Hamlet Area of Melrose and designated as Agricultural on Schedule A-11 (attached) in spite of the UR3 zoning in full force and effect.

It should be noted that Schedule A-11 includes with the Melrose Hamlet Area and designated as Residential both the developed lands to the west in the vicinity of Vanneck Road and Egremont Drive and ten lots to the east fronting on Egremont Drive and surrounded by West Haven designated as Parks and Recreation.

In light of this unusual situation, this letter is to request support from Middlesex Centre Council for the revision and/or modification to Schedule A-11 to be reflective of the prior London Township and original Middlesex Centre Official Plans' approach to the property. This would entail inclusions of the lands within the Hamlet Area and their designation as Residential consistent with the residential adjacent lands to the east fronting on Egremont and residential lots a short distance to the west which would be appropriate for the following reasons:

1. As is apparent from the aerial photography, the lands are of an irregular configuration and not used or suitable for a variety of reasons for agricultural purposes.
2. The owners would not be seeking higher density residential development in accordance with the UR3 zoning. Instead, the property could be developed for low density residential use and, specifically, a residential vacant land condominium (vlc) which would proceed on the following bases subject to any required planning and technical supporting studies at the appropriate time:

- a) Water servicing for the property is likely to be provided through private wells for each lot. There is opportunity for potential connection to the Lake Huron Primary Water Supply system if a watermain extension is completed in the future along Vanneck Drive from the Komoka – Mt. Brydges water transmission main.
- b) Sanitary servicing for the subject site can be provided through private septic systems, similar to other developments in Melrose. Lot sizing shown is anticipated to accommodate future septic system design. The subject site is outside the Wellhead Protection Area (WHPA) for the Melrose Water Treatment Facility and should not adversely affect the existing system.
- c) Development of the property will require stormwater management design in accordance with the Ministry of the Environment, Conservation and Parks (MECP) Guidelines. There is potential opportunity for Low Impact Development (LID) solutions for the individual lots and the common amenity area. Existing stormwater drainage outlets are anticipated to be maintained in post-development conditions.
- d) single laneway access from Egremont Drive via relocation of the existing laneway subject to any applicable requirements of the County of Middlesex.

The vlc proposal is conceptually depicted on the enclosed drawing which would result in the creation of approximately 12 residential units and would be compatible in density with existing residential development in the vicinity within Melrose to the east and to the west, all of which is zoned as Hamlet Residential (HR) and (HR-1) requiring a minimum lot area of 2000 m² where full services are not available. It would essentially fill in the gap between the existing subdivision to the west and the severed lots to the east fronting on Egremont Drive.

It is understood that the next step following Middlesex County approval of OPA No. 59 will be updating the Middlesex Centre Zoning By-law. This juncture represents an opportunity for Council, during the County's review of OPA No. 59, to support correction of what very likely amounts to a technical error given the UR3 zoning. This would represent a minor settlement area expansion and would provide for very limited growth in Melrose that is a significant decrease beyond what is permitted by existing zoning.

Moreover, based on Section 24(4) of the Planning Act the current UR3 zoning would be deemed to conform with the Official Plan and it would be appropriate for the designation to be revised accordingly.



CONCEPT SUMMARY	
UNIT AREA	4.87ha
AMENITY AREA	0.22ha
COMMON ELEMENT	0.26ha
TOTAL SITE AREA	5.35ha
UNITS	12
SITE DENSITY	2.24 UPH

6896 EGREMONT DRIVE
VACANT LAND CONDOMINIUM CONCEPT PLAN

CONTRACT #:	22278	SCALE:	1/2"=1'-0"
PROJECT NAME:	EGREMONT DRIVE DEVELOPMENT MIDDLESEX COUNTY WEST HAVEN INC.		
		DRAWING #:	

		REVISION		
#	DESCRIPTION		COMMUNITY	BY



Should this take place, the Owners would be willing to accept what would constitute a "down zoning" suitable to the vlc concept once that is refined and supported by appropriate reports and studies as required and approved by the Municipality .

I would appreciate the opportunity for my representative to appear before Council at its September 7 meeting as a delegation to discuss this matter.

Yours truly,



Dominic Mescia
West Haven Inc./832928 Ontario Inc.

Attachments:

- Adopted Middlesex Centre Official Plan Schedule A-11 Melrose Hamlet Area
- Middlesex Centre Zoning By-law Key Map U-11 Melrose

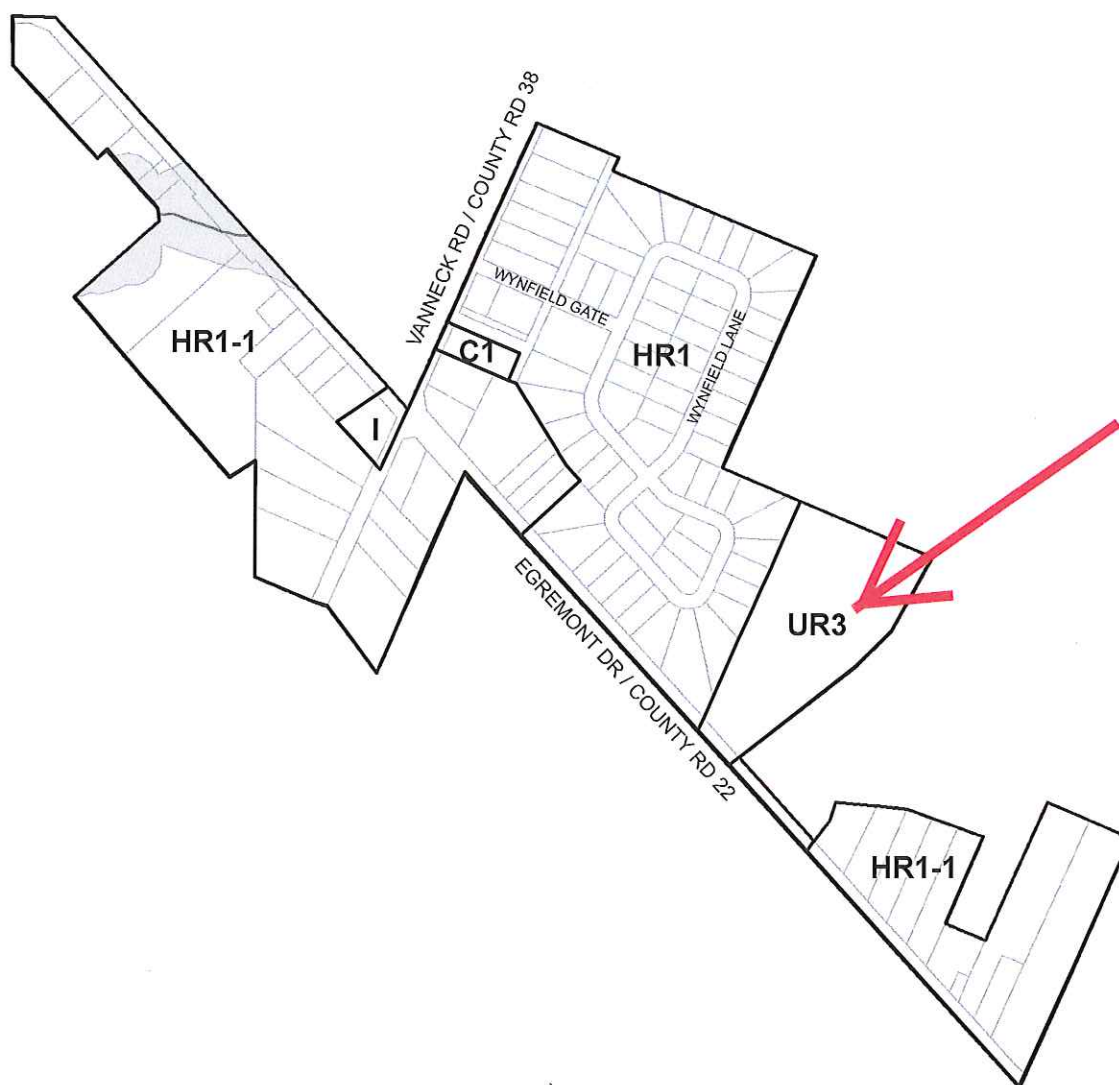
cc. Durk Vanderwerff,
Director of Planning,
County of Middlesex



MUNICIPALITY OF MIDDLESEX CENTRE

ZONING BY-LAW #2005-005

MELROSE



SCHEDULE A
KEY MAP: U-11

NOTE: Schedules should be read in conjunction with applicable provisions of the Zoning By-Law.

SCALE 1:10,000

0 250 500 750 1,000 Meters



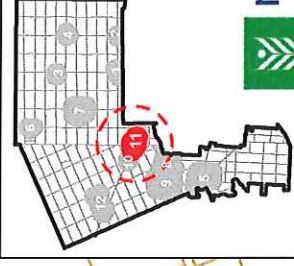
Schedule A-11 Melrose Hamlet Area

Legend

- Land Use Designations**
- Residential
 - Medium Density Residential
 - Hamlet
 - Settlement Commercial
 - Rural Commercial
 - Village Centre
 - Rural Industrial
 - Institutional
 - Settlement Employment
 - Parks and Recreation
 - Natural Heritage Enhancement Area
 - Natural Environment
 - Agriculture
- Other Designations**
- Settlement Boundary
 - Middlesex Centre Boundary
 - Aggregate Overlay
 - Railway Line



WSP

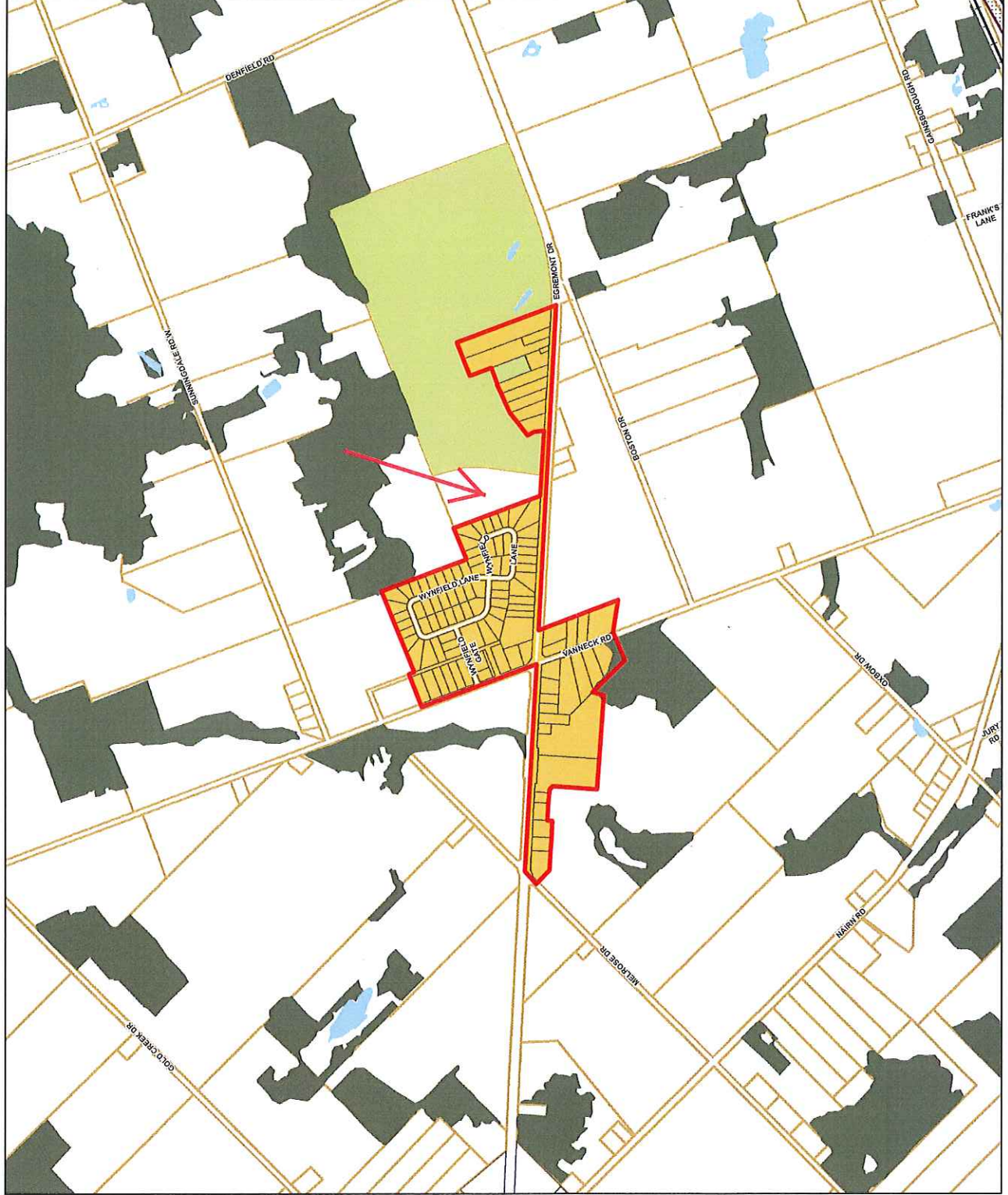


DRAFT



**middlesex
centre**

Date: May 10, 2022





300 Dufferin Avenue
P.O. Box 5035
London, ON
N6A 4L9

London
CANADA

August 25, 2022

Durk Vanderwerff
Director of Planning
County of Middlesex, Planning Department
399 Ridout Street North
London, ON N6A 2P1

Re: Official Plan Amendment 59 – Municipality of Middlesex Centre

Thank you for the opportunity to comment on the Approval Authority's consideration of Middlesex Centre's Official Plan Amendment 59. Please find comments below related to the proposed employment area land needs and boundary expansion, and the proposal's relationship to growth management and County Official Plan settlement areas.

Employment Land Needs

In support of Official Plan Amendment 59, a growth management technical report and employment area expansion analysis were prepared. The growth management report is intended to provide an overview of macro-economic and demographic trends, an employment area conversion assessment, land supply analysis, and an economic development strategy. The employment area expansion analysis is to provide suitable location options to allocate any identified employment land need with a focus along the Highway 401/402 corridor within the municipality.

Figure 7-14 on Page 98 of the 'Growth Management Strategy Technical Report – Final' dated February 3, 2022, identifies that after removing proposed employment area conversions identified through the assessment, 72 ha of net employment land is available after adjustments for infrastructure and environmental constraints are made. This generally aligns with the accepted approach to calculating land supply. Figure 7-14 is below:

Area	Total Gross Vacant Settlement Employment Land (ha)	Potential Employment Conversions (ha)	Environmental Constraints Adjustment (ha)	Adjustment for Roads and Other Internal Infrastructure (ha)	Net Developable Vacant Settlement Employment Lands (ha)	Net Developable Vacant Settlement Employment Lands Supply Adjusted for Land Vacancy (ha)	Share of Vacant Settlement Employment Lands
	(A)	(B)	(C)	(D)	$E = A - (B+C+D)$	$F = E \times 0.7$	
Ilderton	85	59	1	6	19	13	26%
Komoka	66	-	0	23	43	30	60%
Urban Settlement	151	59	1	29	62	43	86%
Arva	0	-	0	0	0	0	0%
Delaware	14	-	0	4	11	7	14%
Community Settlement Area	14	-	0	4	11	7	14%
Middlesex Centre	165	59	1	33	72	50	100%

However, this is based on Table 7.7, where only 5% is allocated to opportunities to accommodate growth and satisfy demand through intensification and redevelopment as required by PPS policy 1.1.3.8 a). This appears low given the intensification assumption covers both the redevelopment of older sites for new employment uses and the expansion of industrial operations on existing industrial lands that have not been fully built out.

Furthermore, the table then goes on to deduct an additional 30% (22 ha) of net supply based on an adjustment for 'land vacancy' which decreases the total supply identified to 50 ha. The 'land vacancy' ratio appears inappropriate as it is unclear how the generic 30% for Middlesex Centre was arrived at, nor have these expected vacant lands been shown.

The definition for Employment 'land vacancy' is found in Section 4.2.2. (page 49) which states: *'The adjustment for long-term employment land vacancy represents sites that are unlikely to development [sic] over the long term (i.e. 2021 to 2046) due to odd/small lot sizes and poor configuration, underutilized employment sites, sites which have may have long-term development constraints as well as site inactivity/land banking, which may tie up potentially vacant and developable lands.'* The corresponding developable land area supply adjusted for 'land vacancy' is found in Figure 4-4 (page 50) as well as Figure 7-14 (page 98) after removing potential employment conversions in Ilderton. It is also unclear why a factor of 30% was applied for employment lands compared to a factor of 15% for residential.

The minimal consideration of intensification and redevelopment opportunities and the application of an elevated employment 'land vacancy' ratio not based on any actual constraints review appears to result in an overstated available land supply.

On Figure 7-15 (Page 100), the estimated demand for Employment Land is calculated to be 128 ha demand over the planning horizon. Figure 7-15 is shown below:

Settlement Area	Total Settlement Employment Land Demand (A)	Net Settlement Employment Land Supply (B)	Net Settlement Employment Land Surplus/(Shortfall) (C) = A - B	Net Employment Lands Less Land Vacancy D = C*1.3	Gross Land Need
Ilderton	3	13	10	-	-
Komoka-Killworth	5	30	26	-	-
Urban Settlement Area	8	43	36	-	-
Arva	1	-	(1)	-	(1)
Delaware	120	7	(113)	(101)	(135)
Community Settlement	121	7	(114)	(101)	(135)
Middlesex Centre	128	50	(78)	(101)	(135)

Based on the previous assumptions of Employment Land area from Figure 7-14 resulting in 50 ha of available supply, a total shortfall of 78 ha is identified. The 30% 'land vacancy' ratio along with a stated 25% increase applied to both the shortfall and 30% land vacancy to account for infrastructure and environmental constraints is then applied resulting in a total land need of 135 ha.

There are several concerns with this calculation. Firstly, as noted above the current supply of 50 ha is likely quite understated. The 72 ha identified in Figure 7-14 should be used as this represents the actual supply – as the total supply is not proposed to be converted to other uses and is designated and available it cannot simply just be ignored.

While it is appropriate to incorporate adjustments for infrastructure constraints, it appears from the calculation that despite a 75% net to gross ratio being identified, a 66% net to gross to ratio was actually used to arrive at the identified need of 135 ha. A 33% increase for infrastructure seems excessive and does not align with the approach used in Table 7-14.

In addition, the application of the 30% 'land vacancy' to the shortfall makes little sense. This appears to assume that 30% of new lands to be identified through the planned boundary expansion will be constrained and fail to develop over the planning horizon despite suitability and appropriateness as an employment area needing to be demonstrated through policy 1.1.3.8 of the PPS.

Based on the above, while maintaining the 5% for intensification and redevelopment, and applying a 25% adjustment for infrastructure, the gross land need over the 25-year planning period for Middlesex Centre is 70 ha, not 135 ha.

Settlement Area	Total Settlement Employment Land Demand (A)	Net Settlement Employment Land Supply (B)	Net Settlement Employment Land Surplus/(Shortfall) (C) = A - B	Adjustment for Roads and Other Internal Infrastructure (D) = C*0.25	Gross Land Need (E) = C+D
Middlesex Centre	128	72	(56)	(14)	(70)

It is also important to note that the 128 ha of demand is based on achieving 13 employees/ha for employment over the planning horizon. This ratio is curious given the intent of any expansion as identified in the Expansion Analysis is to accommodate 'a prestige business park with amenities to attract the region's growing knowledge-based and industrial economy'. Given manufacturing, research and agri-food uses typically achieve 25-30 jobs/ha, it is likely that even the gross land need in the chart above remains overstated as 25 jobs/ha would result in a land need of approximately 35-40 hectares. Further underscoring the inappropriateness of the identified 135 ha.

Employment Area Expansion Analysis

The Employment Area Expansion Analysis dated February 4, 2022, proposes to allocate the gross employment land need in its entirety to the south of Delaware adjacent to Highway 402. While there is no concern with trying to consolidate and reorganize the employment areas in the Municipality, the additional amount of land proposed is nearly double (if not more) the gross land need over the planning horizon.

It is noted that while policy 1.1.2 of the PPS limits the amount of land that can be designated to a maximum of 25 years, it goes on to state that '*Nothing in policy 1.1.2 limits the planning for infrastructure, public service facilities and employment areas beyond the 25-year time horizon*'. This is important as it recognizes that while a municipality can only designate lands up to the 25-year horizon (in this case 70 ha), it can plan its systems for beyond that period. As such, if the Municipality desire is to plan for 135 ha of employment area, it can designate up to 70 ha through this process and continue to plan towards accommodating the additional 65 ha at some later date. The proposed land need identified through this comprehensive review needs to be reduced.

Furthermore, PPS policy 1.1.3.8 identifies that a planning authority may only allow the expansion of a settlement area boundary only when certain criteria have been demonstrated. Key criteria relate to prime agricultural areas and agricultural operations. As the proposed new employment area is currently designated as a prime agricultural area under the PPS, any expansion analysis must include an evaluation of alternative locations in accordance with policy 1.1.3.8 c) and demonstrate that the proposed settlement area complies with the minimum distance separation formulae under policy 1.1.3.8 d). This has not been done. Given that agricultural operations have not been identified or assessed, there is also no ability for the proposal to satisfy policy 1.1.3.8 e) that requires impacts from expanding settlement areas be mitigated to the extent feasible.

Oversupply concerns aside, the planning authority is in no position to make a decision on this matter until all the criteria have been demonstrated as required by the PPS.

Growth Management and Settlement Areas

As noted in comments through the County of Middlesex Official Plan review, it is a requirement through policy 1.2.4 of the PPS for upper-tier municipalities like the County of Middlesex to identify the areas (and thus their extents) where growth or development will be directed. Lower-tier plans like those for Middlesex Centre are to conform to upper-tier plans and reflect these areas through their official plans. The letter regarding the County of Middlesex Official Plan Update and related attachments are included as Appendix A.

Based on Schedule A of the County of Middlesex Official Plan, the proposed expansion area is clearly designated as 'Agricultural Areas' that is designated as a prime agricultural area protected for agricultural uses. As such, it is premature for a lower-tier plan to expand its boundaries without the County Official Plan being updated first.

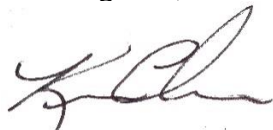
Conclusion

Based on the above, it is premature for the County to approve Middlesex Centre Official Plan Amendment 59. The proposed additional employment area designation clearly appears to exceed the 25-year maximum and was not considered in the context of the required PPS criteria related to prime agricultural areas and agricultural operations.

Furthermore, the proposed settlement area boundary expansion does not reflect an area where growth or development is to be directed as shown on the County of Middlesex Official Plan.

Thank you again for the opportunity to provide input.

Kind regards,



Kevin Edwards
Manager, Long-Range Planning, Research and Ecology
Planning and Development
City of London

Appendix A: Letter re: County of Middlesex Official Plan Update dated May 3, 2022

Cc: Gregg Barrett, Director, Planning and Development
Justin Adema, Manager, Long-Range Planning and Research
Michael Tomazincic, Manager, Strategic Land Development



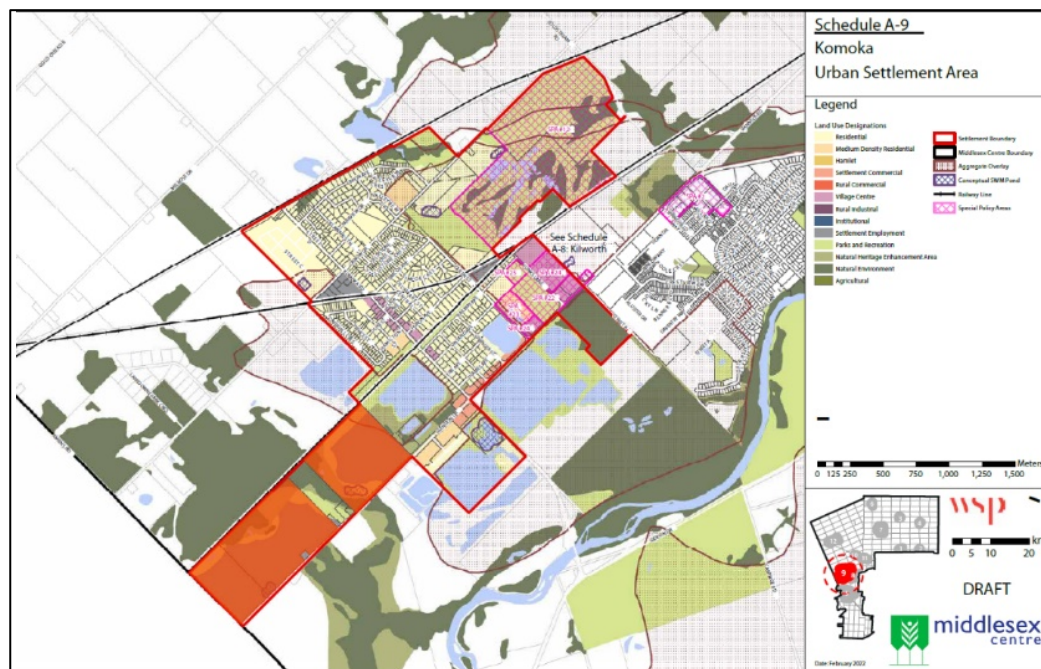
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Memorandum

To/Attention Mr. Jim Bujouves **Date** May 20, 2022
From IBI Group **Project No** 138867
cc
Subject **Middlesex Centre Growth Management Analysis**

IBI Group Professional Services Inc. (IBI Group) has been retained by Farhi Holdings Corporation (FHC) to advise them on their land holdings in Middlesex Centre. FHC recently purchased three parcels of vacant land totalling approximately 89 hectares along Glendon Drive in the municipality of Komoka, as indicated on Figure 1 in red.

Figure 1 – Site Location



The lands are currently designated “Settlement Employment”, “Natural Heritage Enhancement Area” and “Natural Environment”, however FHC has a long-term vision to develop the lands for low and medium density housing, with the potential of including some service and mixed-use commercial for new residents along Glendon Drive.

This memo is to inform FHC of the growth management arguments for the conversion of their lands to non-employment uses and to identify how this conversion will support the Municipality's 2046 growth forecasts. To inform our analysis, IBI Group reviewed the following documents:

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- Employment Area Expansion Analysis – Final Report and Appendix A & B (February 4, 2022);
- Population and Housing Projections for Middlesex County (Jan 2021);
- OP Review – Growth Management Study Technical Report (October 2021); and
- OP Review – Growth Management Study Final Report (February);

Summary of Findings:

- Between the draft technical reports, the housing forecast was adjusted, putting more growth to the Community of Delaware, despite it being designated as a “Community Settlement Area” in the County’s urban structure. Community Settlement Areas are not intended to accommodate large amounts of growth.
- The housing forecast prioritizes growth to the Urban Settlement Areas, which include Ilderton and Komoka-Kilworth, where the subject site is located. In total, Komoka-Kilworth is anticipated to accommodate over 50% of the future residential growth between 2021 and 2046.
- In assessing the ability of the Municipality to accommodate growth to 2046, the revised report identifies a shortfall of 107 gross hectares of residential land for Middlesex, the majority of which occurs in Delaware. Komoka-Kilworth is considered to have neither a surplus nor a shortfall.
- The revised report recommends that 59 gross hectares of employment lands in South Ilderton are converted to non-employment uses in order to meet part of the residential shortfall.
- The remainder of the shortfall is recommended to be accommodated through a Settlement Boundary expansion in the Community of Delaware. There is no indication of where the lands will be located, nor the potential cost of servicing these lands.
- Delaware is a “Community Settlement Area”, which is intended to be an area of limited growth.
- The subject site, although currently designated for employment, does not appear to be in the current employment inventory, nor any other supply analysis. The report is silent on how the lands will be designated in the future.
- In reviewing the employment land need, the report identifies a shortfall of 73 net hectares, which is recommended to be accommodated through an additional Settlement Boundary expansion in Delaware. The expansion is anticipated to cost \$46 million to service.

Considering the subject site is already located within the urban boundary and contiguous to existing residential, the conversion of these lands to non-employment uses would be reasonable as it would prevent the need to expand the Settlement Boundary and respect the Municipality’s urban settlement hierarchy. It is recommended that FHC request a meeting with staff to discuss these changes, and the justification of a Settlement Boundary Expansion in Delaware over the conversion of the subject site.

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Residential Land Needs

Watson and Associates produced their final report Growth Management Study Technical Report in February of 2022. Between the Draft Technical Report, and the Final Report, there have been several shifts in the residential housing forecasts, which have resulted in different recommendations for growth, and ultimately weaken the growth management argument for the subject site.

Within the Municipality of Middlesex Centre, the settlement structure includes Urban Settlement Areas, Community Settlement Areas and Hamlet Areas. The majority of growth is to be prioritized to the Urban Settlement Areas, which include Ilderton and Komoka-Kilworth, where the subject site is located. In total, Komoka-Kilworth is anticipated to accommodate over 50% of the future residential growth between 2021 and 2046.

The final report included revised residential growth forecasts which increased the forecast to Delaware from 450 to 760 units. It appears that the majority of the change was based on the reallocation of growth from Arva to Delaware (310 units, the majority low density). As Delaware is not an Urban Settlement Area, and unlike Ilderton, Komoka-Kilworth and Arva, does not have full municipal services, it is difficult to understand the justification for this shift.

2021 - 2046 Residential Growth Forecast Figure 7-3

Development Location	Low Density	Medium Density	High Density	Total units
Arva	120	50	20	190
Delaware	510	170	80	760
Ilderton	920	170	60	1,150
Komoka-Kilworth	2,750	370	420	3,540
Rural	360	-	-	360
Municipality	4,660	760	580	6,000

Source Official Plan Review - Growth Management Study Final Report - February 2022

2021 - 2046 Residential Growth Forecast - Table D-3C

Development Location	Low Density	Medium Density	High Density	Total units
Arva	320	130	50	500
Delaware	310	90	50	450
Ilderton	1,000	180	60	1,240
Komoka-Kilworth	2,670	400	420	3,490
Rural	370	-	-	370
Municipality	4,670	800	580	6,050

Source Official Plan Review - Growth Management Study Technical Report - Draft October 25, 2021

Small adjustments were made in Komoka-Kilworth and Ilderton which did not fundamentally change the unit types or growth forecasts moving forward.

The findings of the Municipalities residential forecast indicated that 283 hectares of residential land were required. The current supply is 234 hectares, resulting in a shortfall of 48 hectares. Assuming a net-to-gross factor of 55% to account for local infrastructure (e.g. roads, parks, schools, stormwater, etc.), this results in a gross land need of 107 hectares. This land need would need to be accommodated through either an Urban Settlement Boundary expansion and/or the re-designation of Settlement Employment Lands.

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Residential Land Need - Appendix E

Development Location	Land Need (net ha)	Land Supply (net ha)	Surplus/Shortfall
Arva	13	13	-
Delaware	51	30	(21)
Ilderton	53	26	(27)
Komoka-Kilworth	165	165	-
Municipality	282	234	(48)

Source: Official Plan Review - Growth Management Study Final Report - February 2022

Residential Land Need - Appendix E

Development Location	Land Need (net ha)	Land Supply (net ha)	Surplus/Shortfall
Arva	34	13	(21)
Delaware	30	30	-
Ilderton	57	26	(31)
Komoka-Kilworth	153	165	12
Municipality	274	234	(40)

Source: Official Plan Review - Growth Management Study Technical Report - Draft October 25, 2022

It should be noted that the previous draft analysis had a surplus of lands for Komoka-Kilworth, however, both Arva and Komoka-Kilworth now are in equilibrium, with the shortfalls in Delaware and Ilderton. It is important to note that the draft study from October 2021 also identified a surplus of 27 gross hectares in Komoka-Kilworth, while Delaware's supply was considered sufficient.

As it relates to Ilderton and Delaware, the final report identified the need for 59 gross hectares and 48 gross hectares of residential lands respectively. The supply of urban residential lands in Komoka-Kilworth and Arva were determined to be sufficient to accommodate long term housing demand over the next 25 years.

Comments on Methodology

In determining land need for the municipality, the growth management report assumes the total housing demand, applies a net density and determines a net land requirement. In reviewing the assumptions for each of the communities, IBI Group find them to be overall appropriate.

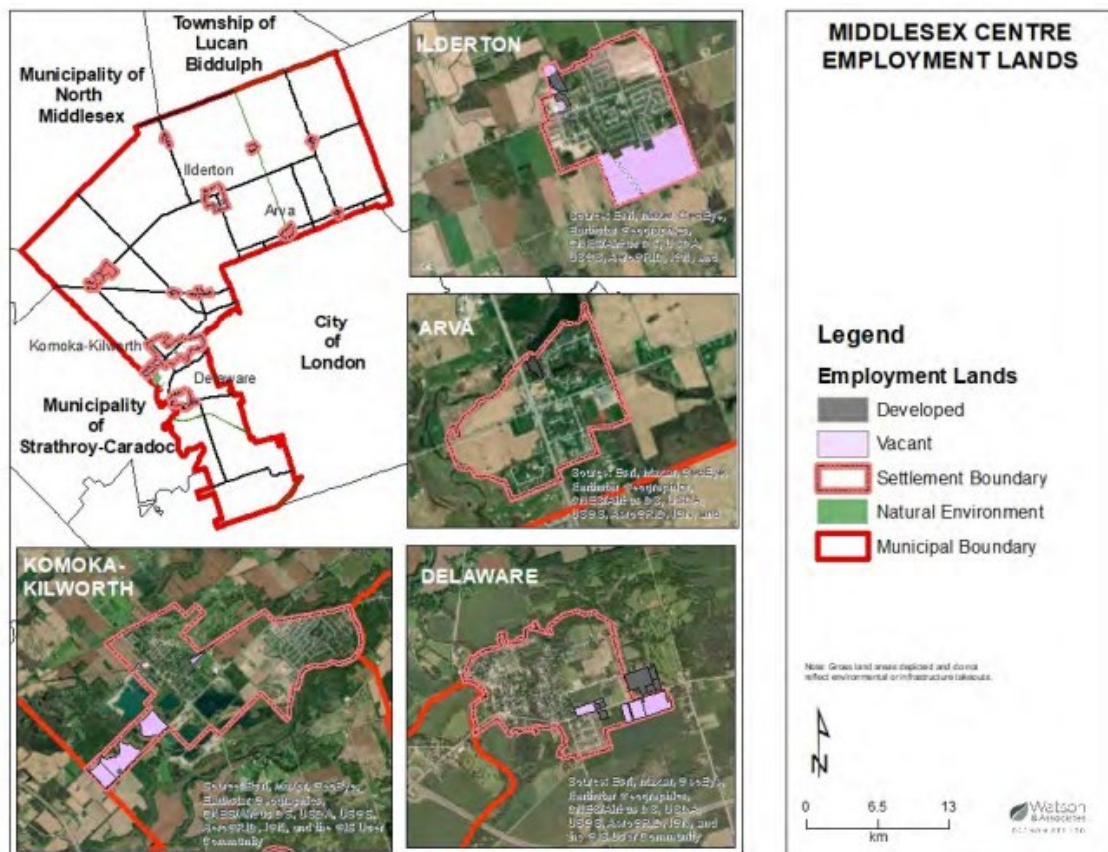
- For Komoka-Kilworth and Ilderton, the analysis uses a net density of 22 units per hectare.
- For Delaware and Arva, they use 15 units per hectare.
- No mapping was provided to indicate the location of the vacant and planned supply.
- Although the demand was adjusted for infrastructure and the supply did not include environmental lands, it is unknown if buffers to natural heritage and other hazards were removed from the supply.
- A 15% market vacancy was applied to all vacant residential lands.

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Employment Land Needs

The Growth Management Study Technical Report (October 25, 2021) indicates through their employment land analysis that the subject lands, despite being designated for employment, are excluded from the employment lands inventory due to their uncertainty for industrial development. The analysis of employment lands indicates that there is a market focus on lands which have Highway 401 and 402 visibility and access, which these lands do not offer.

Figure 4-3
Municipality of Middlesex Centre
Employment Lands



In assessing employment land need, there is again some variations between the final report and the draft report from October. The largest change is the reduction in supply for both Ilderton and Komoka-Kilworth

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Employment and Need - Appendix E

Development Location	Land Need (net ha)	Land Supply (net ha)	Surplus/Shortfall
Arva	1	-	(1)
Delaware	120	7	(113)
Ilderton	3	18	15
Komoka-Kilworth	4	30	26
Municipality	128	55	(73)

Source: Official Plan Review - Growth Management Study Final Report - February 2022

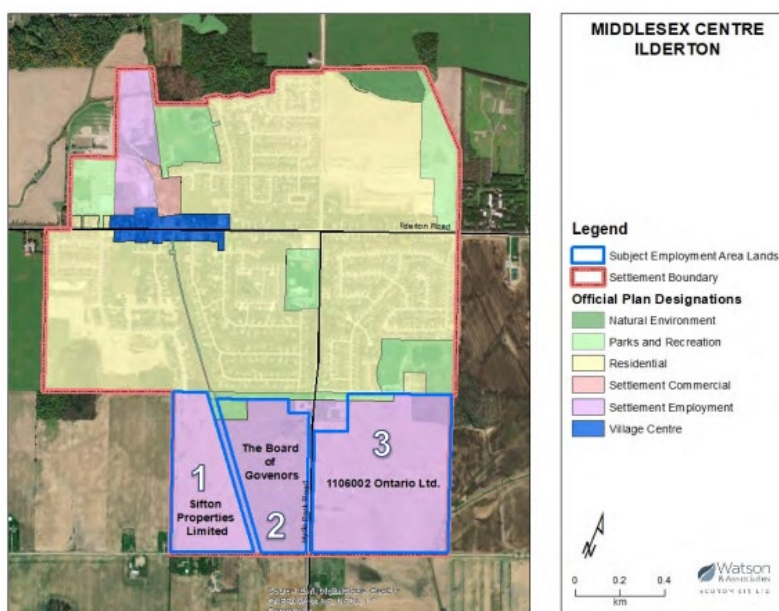
Employment Land Need - Appendix E

Development Location	Land Need (net ha)	Land Supply (net ha)	Surplus/Shortfall
Arva	2	-	(2)
Delaware	120	8	(112)
Ilderton	4	4	-
Komoka-Kilworth	153	165	12
Municipality	279	177	(102)

Source: Official Plan Review - Growth Management Study Technical Report - Draft October 25, 2021

Other changes between the two analysis is the assumption that 59 hectares of employment land will be converted in Ilderton. The Employment Area Expansion report concludes that properties 1 and 3 (see below image) should be converted to non-residential uses, with property 2 having a Special Policy Area to look at allowing revised employment uses.

Figure 7-9
Municipality of Middlesex Centre
Ilderton – Settlement Employment Land Supply



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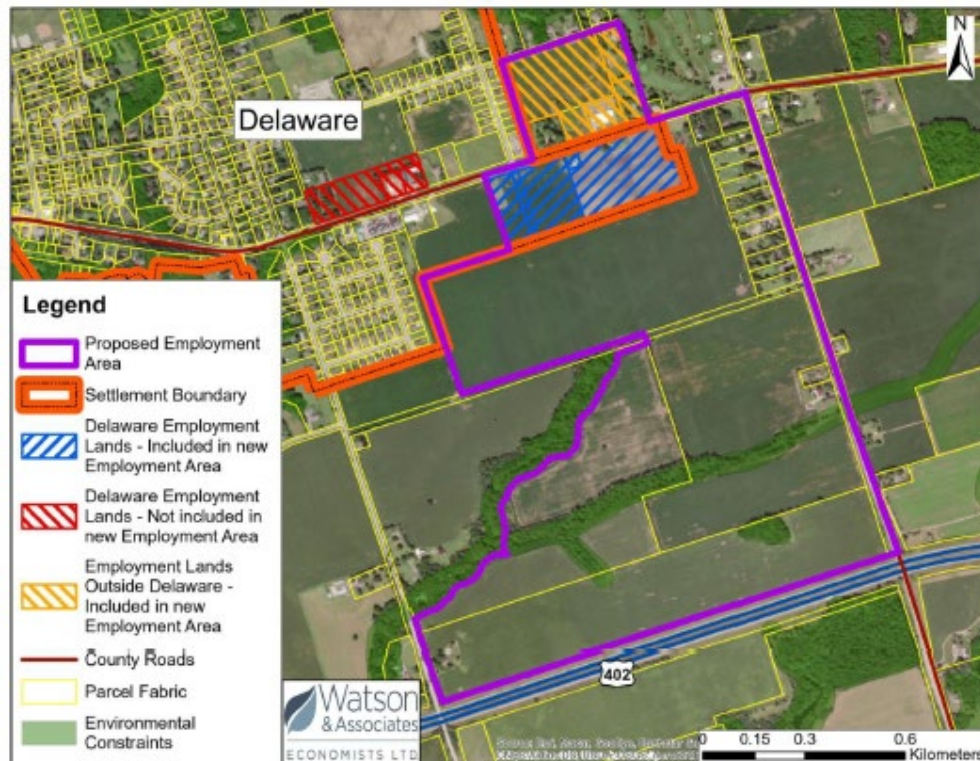
The Komoka-Kilworth supply has also been reduced significantly, but there is no corresponding explanation, except the lack of highway frontage and non-developable features, which would indicate that these lands “are anticipated to serve as a more secondary Settlement Employment Area for the Municipality over the long-term.” (February Report p. 56). It is not clear what is intended to happen to the lands if they are not identified in the supply and if the municipality is looking for them to be maintained as future employment or remove them from the Settlement Boundary. FHC should seek clarity on how these lands will be designated going forward.

Employment Area Expansion

In February 2022, Watson and Associates published a supplementary background study to inform the creation of a new Employment Area within Middlesex Centre, to help the municipality plan a cohesive Employment Area vision which uses the strategic advantages of the 401/402 corridor. This report supports the inclusion of “Employment Area 1” for the preferred location for a new Employment Area. This report builds upon the technical growth management work, which determined that there was a need for additional employment lands, and thus conformed with the PPS’s requirements for the expansion of a Settlement Boundary.

Employment Area 1 is southeast of Delaware and connects to the existing Settlement Area Boundary and existing vacant employment lands. In total the area is 163 hectares, with a developable area of 147 hectares and would add 135 developable hectares to the municipal land supply. The initial servicing analysis indicates that a total cost of \$46.5 million to develop this area as a fully serviced Employment Area.

Figure 4-1: Map of Proposed Employment Area 1 – Southeast of Delaware



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The report concludes that a new serviced Employment Area within Middlesex Centre along Highway 402 would be a key marketable Employment Area in the County, offering a significant amount of serviced land with proximity to Highway 402, also providing sites with frontage along the corridor. The new location will also provide access to skilled labour from the City of London.

The report assesses the characteristics of successful business parks, which require good access to regional transportation networks, on-site infrastructure, critical mass, available zoned, shovel lands. In addition, industrial business parks typically look for areas with minimal environmental constraints and road patterns that optimize the site and provide market access. Land use compatibility is also a key requirement to minimize noise, traffic and air pollution to neighbouring residential and other sensitive land uses.

Conclusions

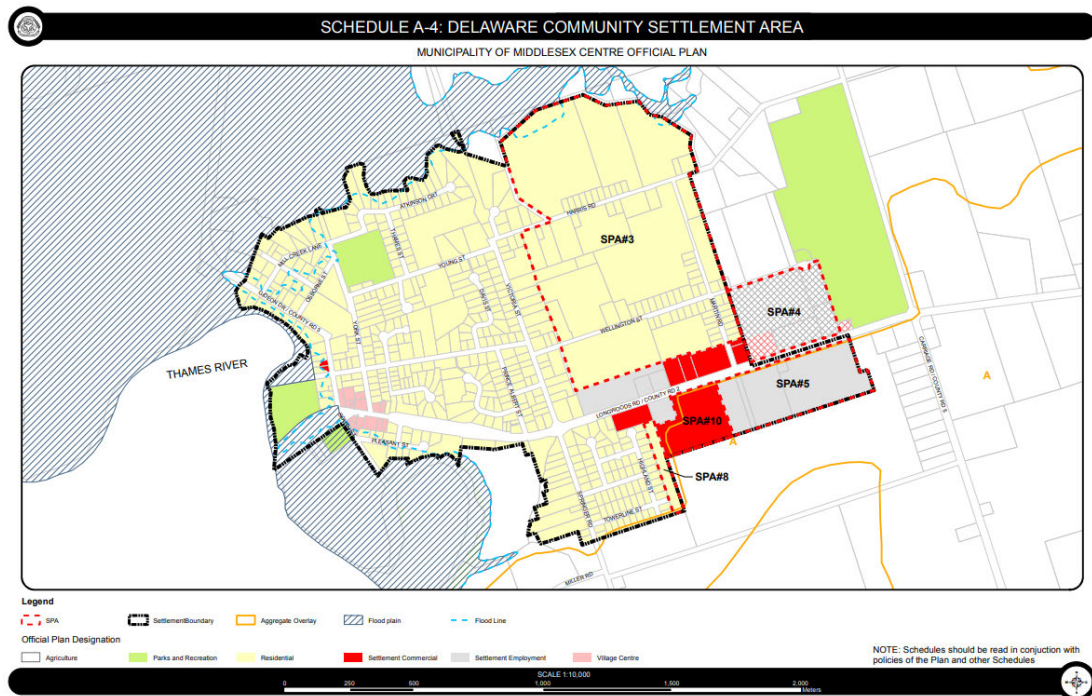
The subject site, under its current employment land designation, is characterized as offering few of the key market and site characteristics which are identified in the expansion land study. The site has environmental constraints which would make it difficult to provide large contiguous lots which are sought after by industrial and business park leaders. The subject site is also in close proximity to residential uses and has limited visibility or highway access which is also sought after.

As the municipality is already bringing in new Employment Area which have more desirable locational traits, it is unlikely that there will be demand for the subject site for employment uses moving forward. Understanding that the current shortfall of 107 gross hectares of lands for residential uses and that the subject site are within the settlement boundary and in close proximity to residential and community uses, there is a great potential for these lands to be re-designated to residential.

The decision to support a Settlement Boundary expansion in Delaware, which is only partially serviced, and is a Community Settlement Area in the Official Plan Settlement Structure, does not appear to align with the intent of the growth policies. As per Section 1.8c of the Official Plan:

“The majority of growth within the Municipality will be directed to Urban Settlement Areas as established in this Plan. Such areas will accommodate growth on full municipal servicing, with such growth being permitted where adequate servicing capacities are established. More limited growth will be permitted within Community Settlement Areas, subject to issues of servicing availability and other policies in this Plan.”

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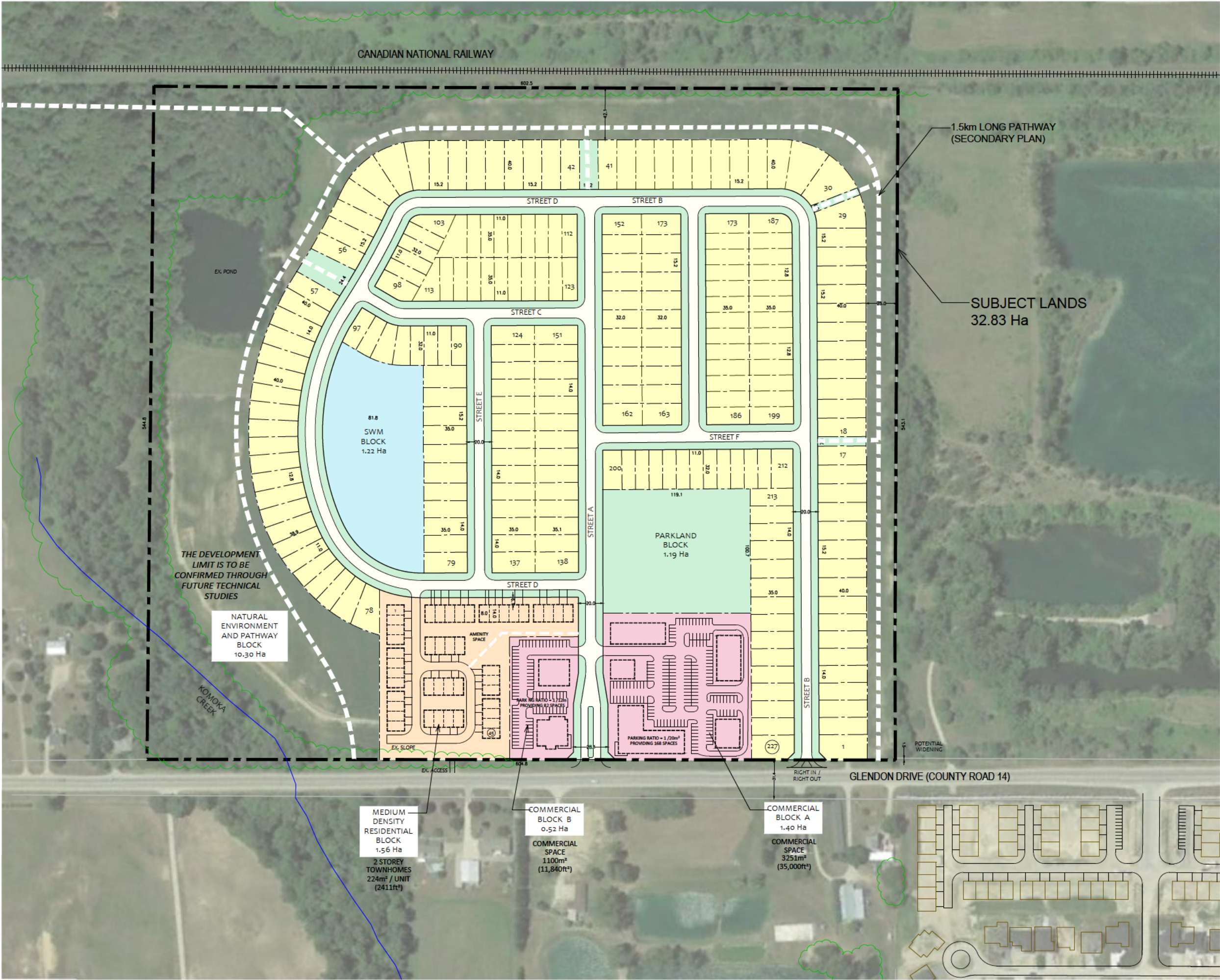


Based on a cursory review of the potential expansion lands for Delaware, there is significant flood plain surrounding much of the community, and the available lands to the south-east are proposed for new employment areas. There appears to be limited opportunities to expand the Settlement Boundary for additional residential. There has also been no analysis of the potential cost of providing servicing to the additional lands and no capacity analysis of the existing infrastructure.

As per the letter of April 18, 2022, FHC has already committed, based on a preliminary servicing review, to the development of the eastern parcel with 150 lots of single and multi-family homes. FHC would plan out the subsequent phases to develop the other lands for residential uses, based on the front-ending of services to enable these lands to be connected to municipal sewage and water.

Seeing as the subject site is already located within the urban boundary and contiguous to existing residential, the conversion of these lands to non-employment uses would be reasonable and would prevent the need to expand the Settlement Boundary while respecting the Municipality's urban settlement hierarchy.

[https://ibigroup.sharepoint.com/sites/Projects2/138867/Internal Documents/6_0_Technical/6.17_Planning/04_Design-Analysis/PTM_Middlesex_LNA_2022-05-17.docx](https://ibigroup.sharepoint.com/sites/Projects2/138867/Internal%20Documents/6_0_Technical/6.17_Planning/04_Design-Analysis/PTM_Middlesex_LNA_2022-05-17.docx)2022-05-20\RB



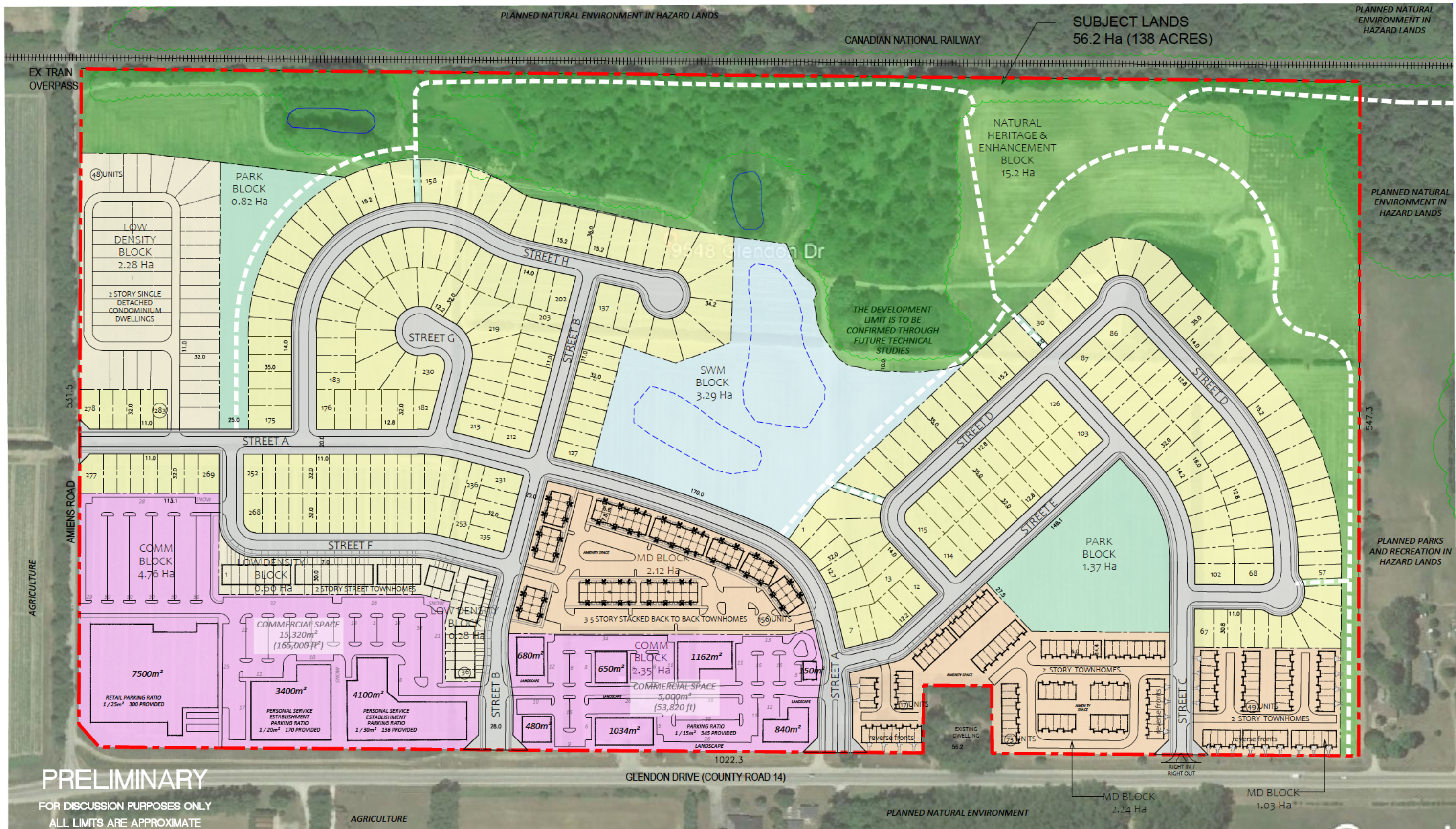
LAND USE SCHEDULE			
LAND USE	Ha	%	UNITS
SINGLE DETACHED LOTS	11.58	51	227
MEDIUM DENSITY RESIDENTIAL BLOCK	1.56	7	45
COMMERCIAL BLOCKS	1.92	9	
SWM POND BLOCK	1.22	5	
PARKLAND BLOCKS	1.40	6	
STREETS	4.85	22	
Developable Total	22.53	100	
NATURAL ENVIRONMENT & PATHWAY BLOCK	10.30		
TOTAL	32.83		272

- LEGEND
- SUBJECT LANDS
 - STREET LINE
 - PROPERTY LINE
 - MULTI USE PATHWAY

- DESIGN CONSIDERATIONS
- CONNECTIVITY THROUGH MODIFIED GRD NETWORK FOR CIRCULATION.
 - MULTI USE TRAIL FROM SECONDARY PLAN PROVIDES A 1.5 km LOOP WITH SEVERAL ACCESS POINTS LOCATED AT INTERSECTIONS.
 - STORM WATER POND LOCATED AS PER SECONDARY PLAN AND LOW POINT ON SITE WITH STREET FRONTAGE AND LOT BACKING ON.
 - TWO VEHICULAR ACCESSES TO GLENDON DRIVE WITH ONE RESTRICTED TO RIGHT IN AND OUT IN ORDER TO DIRECT THE MAIN GATEWAY ENTRANCE TO STREET A.
 - COMMERCIAL ALONG GLENDON DRIVE WITH AN MD BLOCK WITH STREET ORIENTED UNITS PROVIDE A NOISE BARRIER FROM GLENDON DRIVE AND INTERIOR ROAD ACCESS.
 - CENTRALIZED PARKLAND WITH STREET FRONTAGE AND 'EYES ON THE PARK' FROM REAR AND FRONT YARDS.
 - MAXIMIZE LOTS BACKING ONTO MULTI USE TRAIL AND NATURAL FEATURES.
 - MIX OF LOT SIZES BETWEEN 11m TO 15.2m AND DEPTHS BETWEEN 32m AND 40m

Conceptual Layout - C
Concession 2 South Part Lot 3
FARHI HOLDINGS

Sep 12, 2022
20-3404
1: 3,000 (11x17)
0 30 60 90m





STRIK

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P: 519-471-6667

KITCHENER LOCATION

1415 Huron Rd., Unit 225
Kitchener, ON N2R 0L3
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Preliminary Sanitary Sewer Design Sheet

Municipality of Middlesex Centre

Population Densities

Single family/semi detached = 3.0 people/unit
Townhouses = 2.4 people/unit
Commercial/Institucional = 100 people/ha

Design Criteria (Litres/capita/day) 350
Sewage Infiltration (Litres/hectare/sec) 0.1
Harmon Formula (Peaking Factor)
M = 0.8*(1 + 14/(4+P^0.5))
Uncertain Development Factor of 1.1 applied to sewage peak flow

Date: September 9, 2022
Job Number: SBM-22-2381
Client: Farhi Holdings Corporation
Project: Proposed Subdivision
Location 9548 & 9826 Glendon Drive, Komoka
Designed By: JV
Reviewed By: BH

Location				Area						Sewage Flows				Sewer design						Profile Design					
Area No.	Street Name	From MH	To MH	Delta Hectare	Total Hectare	People Per Lot	No. of Lots	Delta Pop.	Total Pop.	Harmon Peaking Factor	Infilt L/S	Sewage L/S	Total L/S	n	Pipe Slope %	Calc'd Dia. mm	Dia. mm	Capacity L/S	Velocity m/s	Length m	Fall in Sewer	Headloss	Drop in U.S. MH	U.S. Invert	D.S. Invert
	Parcel 1, Phase 1			9.91	9.91	3	90	270	270	4.0976	0.99	4.48	5.47												
	Parcel 1, Phase 1, Commercial Block			1.40	11.31	140		140	410	4.0170	1.13	6.67	7.80												
	Parcel 1, Phase 1b, Townhouses			1.56	12.87	2.4	45	108	518	3.9663	1.29	8.32	9.61												
	Parcel 1, Phase 1b, Commercial Block			0.52	13.39	52		52	570	3.9443	1.34	9.11	10.45												
	Parcel 1, Phase 2			4.75	18.14	3	65	195	765	3.8720	1.81	12.00	13.81												
	Parcel 1, Phase 3			4.37	22.52	3	62	186	951	3.8140	2.25	14.69	16.94												
	Parcel 2, Phase 1			12.80	12.80	3	91	273	273	4.0956	1.28	4.53	5.81												
	Parcel 2, Phase 1b			3.60	16.40	3	57	171	444	4.0002	1.64	7.19	8.83												
	Parcel 2, Phase 1c, Townhouses			1.02	17.42	2.4	50	120	564	3.9467	1.74	9.02	10.76												
	Parcel 2, Phase 1d, Townhowses			2.28	19.70	2.4	91	219	783	3.8660	1.97	12.26	14.23												
	Parcel 2, Phase 2			4.99	24.69	3	21	63	846	3.8457	2.47	13.18	15.65												
	Parcel 2, Phase 2a			2.27	26.96	3	48	144	990	3.8028	2.70	15.25	17.95												
	Parcel 2, Phase 2b commercial Area			4.80	31.76	480		480	1470	3.6859	3.18	21.95	25.12												
	Parcel 2, Phase 2c, Townhouses			2.08	33.84	2.4	156	375	1845	3.6128	3.38	27.00	30.39												
	Parcel 2, Phase 2c commercial Area			2.40	36.24	240		240	2085	3.5717	3.62	30.17	33.79												
	Parcel 2, Phase 3			5.22	41.46	3	64	192	2277	3.5413	4.15	32.66	36.81												
	Total				63.98				3228	3.4152	6.40	44.66	51.06	0.013	0.27%	301.80	375	91.16	0.83						

DOMESTIC WATER DEMAND CALCULATION

	For data entry
	Calculated, not for data entry

DATE:	September 9, 2022
JOB No.:	SBM-22-2381

Client:	Farhi Holdings Corporation
Project:	Proposed Subdivision
Location:	9548 & 9826 Glendon Drive, Komoka, Ontario

Values as per Middlesex Center Infrastructure Design Standards

Avg. Residential Day Demand = 350 L/D/cap =	0.004050926	L/s/cap	As per Chapter 5.(5.3.2)
Max. Day Peaking Factor =	2.75		As per Chapter 5.(5.3.2)
Max. Hour Peaking Factor =	4.13		As per Chapter 5.(5.3.2)
Commercial/Institucional	100	ppl/ha	As per Chapter 5.(5.3.2)
Single Family and Semi-Detached Residential Population Density =	3	ppl/lot	As per Chapter 5.(5.3.2)
Townhouse Residential Population Density =	2.4	ppl/unit	As per Chapter 5.(5.3.2)

Domestic Water Demand

Street Name	Number of Lots	Population	Avg. Day (L/s)	Max. Hour (L/s)	Max. Day (L/s)
Parcel 1, Phase 1	90	270	1.094	4.517	3.008
Parcel 1, Phase 1, Commercial Block	1	52	0.211	0.870	0.579
Parcel 1, Phase 1b, Townhouses	45	108	0.438	1.807	1.203
Parcel 1, Phase 1b, Commercial Block	1	52	0.211	0.870	0.579
Parcel 1, Phase 2	65	195	0.790	3.262	2.172
Parcel 1, Phase 3	62	186	0.753	3.112	2.072
Parcel 2, Phase 1	91	273	1.106	4.567	3.041
Parcel 2, Phase 1b	57	171	0.693	2.861	1.905
Parcel 2, Phase 1c, Townhouses	50	150	0.608	2.510	1.671
Parcel 2, Phase 1d, Townhouses	91	273	1.106	4.567	3.041
Parcel 2, Phase 2	21	63	0.255	1.054	0.702
Parcel 2, Phase 2, Townhouses	36	86	0.350	1.446	0.963
Parcel 2, Phase 2a	48	144	0.583	2.409	1.604
Parcel 2, Phase 2b commercial Area	1	480	1.944	8.031	5.347
Parcel 2, Phase 2c, Townhouses	156	374	1.517	6.264	4.171
Parcel 2, Phase 2c commercial Area	1	240	0.972	4.015	2.674
Parcel 2, Phase 3	64	192	0.778	3.212	2.139
TOTAL:	880	3309.8	13.408	55.374	36.871