

Planning Justification Report

City of St. Thomas Industrial Park

Official Plan House-Keeping Amendment

February 10, 2025

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I hereby certify that this Opinion Report was prepared by a Registered Professional Planner, within the meaning of the Ontario Professional Planner's Institute Act, 1994.

February 10, 2025



Date

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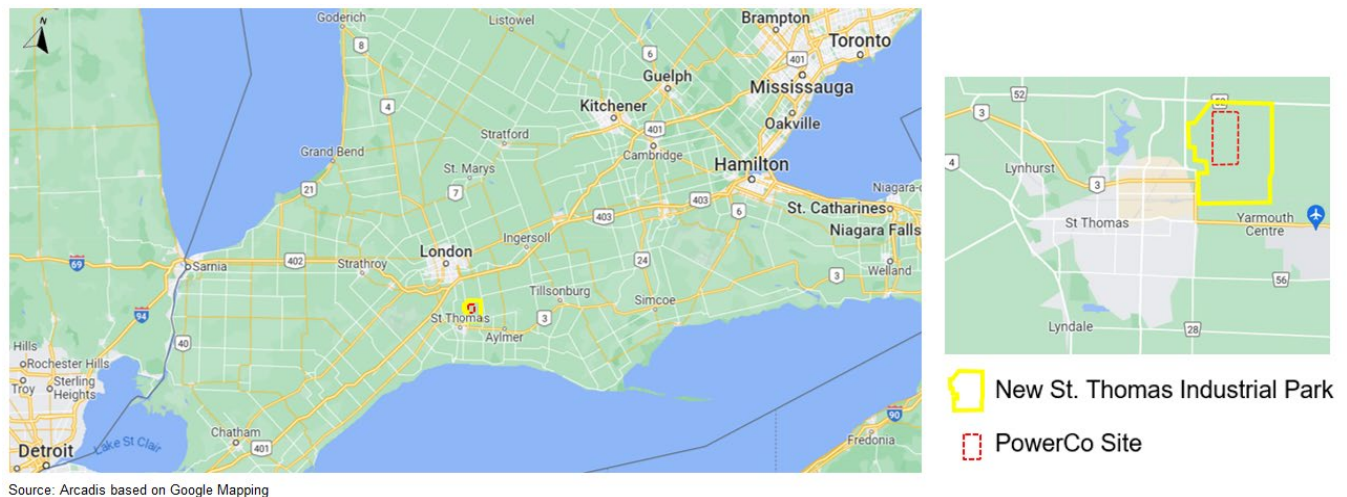
1 Introduction

Arcadis Professional Services (Canada) inc. (“Arcadis”) was retained by the City of St. Thomas (“the City”) to assist in obtaining planning approvals for a new industrial park across 614.8 hectares of land in the north-east part of the municipality.

The City of St. Thomas hired a consultant to undertake an Employment Lands Review in 2018 which found a deficit of employment lands leading to difficulty attracting major new industrial development. To address this, the City acquired lands from the Municipality of Central Elgin adjacent to an area suitable for future industrial development. These lands, together with the existing lands within the City limits, make up the 614.6 hectare industrial park. The lands acquired from Central Elgin are required to be re-designated and brought into conformity with the City of St. Thomas Official Plan.

In April 2023, PowerCo SE, a subsidiary of Volkswagen Group, officially announced its intention to develop a 1.39 million square metre electric vehicle (EV) battery manufacturing plant on a 152.3-hectare site within the new industrial park (hereinafter referred to as “the PowerCo Site”). As shown in Figure 1-1, the lands are a strategic location for industrial uses given they are less than 10 kilometres (km) south of London, Ontario, at the intersect of Highway 401 and 402 providing for direct access to both the Canadian and United States markets. This proximity to major transportation routes offers connections to other industrial/employment uses such as the Great Lakes Automotive Corridor, regional research and innovation cluster, talented workforces, and established supply chains.

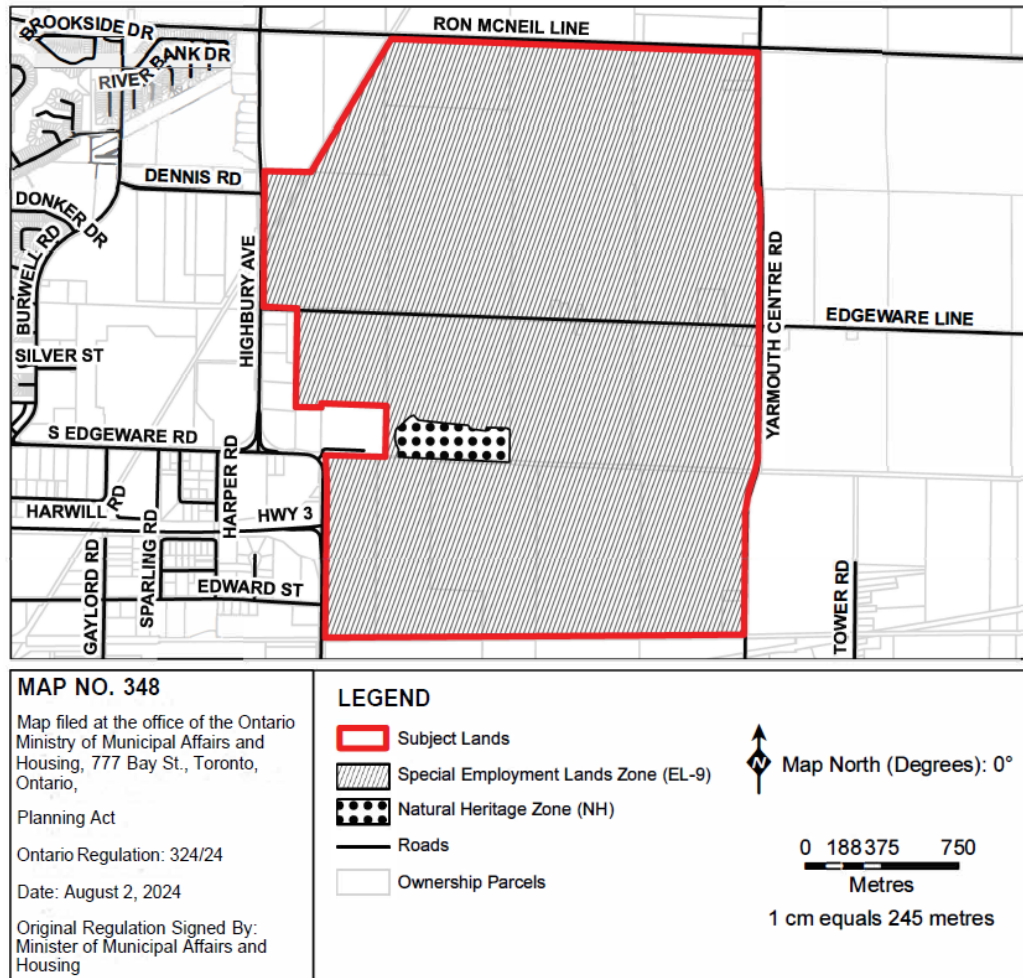
Figure 1-1: Location of New Industrial Park and PowerCo Site in the City of St. Thomas and Southern Ontario



1.1 Background and Previous Approvals

The City has been working through components of the planning approvals process to permit the industrial park on the subject lands. Approximately half of the new industrial park is already designated for employment and industrial uses, while nearly the entirety of the lands have been zoned for employment and industrial uses (Special Employment Lands Zone EL-9) through a Ministerial Zoning Order (MZO) Ontario Regulation 324/24 made under the *Planning Act*. A small portion of the lands have been withheld from the EL-9 zoning and are within the Natural Heritage Zone (NH), as delineated on Figure 1-2.

Figure 1-2: Approved Zoning Map No. 348 from Ontario Regulation 324/24 for the Industrial Park



In addition to the rezoning of these lands, an application for Draft Plan Subdivision was also submitted for the industrial park. The Draft Plan was approved and a letter was submitted in December 2024 to clear the conditions associated with the Approval of this application (34T-23503). A break down of the approved subdivision structure is as follows: These lands have also received Draft Approval for the industrial subdivision, broken down as follows:

- Storm Water Management - Blocks 1, 30, 31, 33
- Future Industrial Uses - Blocks 3, 4, 6, 9, 11, 14, 15, 17, 19, 22, 27, 28
- Naturalized Area – Blocks 2 & 3 and 34
- Tree Retention Land – Blocks 4 and 14
- Rail Shunting Yard – Blocks 24 and 29
- Hydro Corridor – Blocks 5, 16, 12, 13, 20, 21, 23, 25
- HONI Substation – Blocks 23
- Rail Corridor – Blocks 7

- Pump Station – Block 32
- New Streets and Existing Roads (9 parcels)
- Road Widenings – Blocks 10, 18, 26
 - TOTAL AREA 462.5 hectares

The PowerCo site is approximately 152.3 hectares in size and not included within the Draft Plan of Industrial Subdivision and is referenced under a separate Reference Plan (R-Plan).

1.2 Objective of Planning Justification Report

Arcadis has prepared this Planning Justification Report on behalf of the City of St. Thomas in support of the Official Plan House-Keeping Amendment for the new industrial park. The remainder of this report is structured as follows:

- Section 2 provides a description of the new industrial park, the PowerCo Site and the surrounding context;
- Section 3 provides a description of the development plan and details of the components of the industrial park;
- Section 4 provides an overview of the relevant provincial and municipal policies and regulations that guide land use and development, and how the proposed new industrial park and subdivision conform to and supports these policies and regulations; and
- Section 5 presents Arcadis's final conclusions and recommendations for the approval of the proposed Official Plan House-Keeping Amendment.

2 Site Location and Surrounding Context

The following sections provide a description of the location and physical attributes of the new industrial park, an overview of the surrounding area and the larger context. The details of the proposed application are described in Section 3 of this report.

2.1 Site Description

The proposed new 614.8-hectare industrial park is located within the north-east part of the City of St. Thomas. As shown in **Figure 2-1** it is generally bound by:

- North: Ron McNeil Line/Highway 52 (frontage of approximately 1.76 km);
- South: Canadian National Railway (CN) rail line (Cayuga Spur line);
- East: Yarmouth Center Road (frontage of approximately 2.87 km); and
- West: Highbury Avenue South and Centennial Avenue (frontage of approximately 2.43 km) and the Ontario Southland Railway (OSR) rail line.

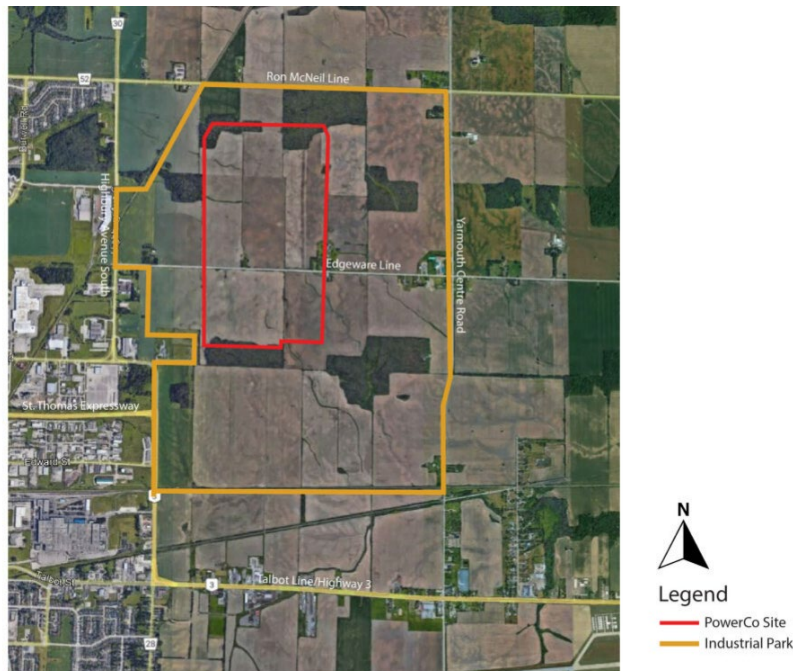
The lands are legally described as:

PLAN OF SURVEY OF PART OF LOTS 9, 10, 11 & 12 RANGE 2 NORTH OF EDGEWARE ROAD AND PART OF LOTS 9 & 12 AND ALL OF LOTS 10 & 11 RANGE 1 NORTH OF EDGEWARE ROAD AND PART OF ROAD ALLOWANCE FOR EDGEWARE ROAD AND PART OF LOTS 9 & 12 AND ALL OF LOTS 10 & 11 CONCESSION SOUTH OF EDGEWARE ROAD Also Known As RANGE 1 SOUTH OF

EDGEWARE ROAD AND PART OF ROAD ALLOWANCE BETWEEN CONCESSION 9 & CONCESSION SOUTH OF EDGEWARE ROAD Also Known As RANGE 1 SOUTH OF EDGEWARE ROAD AND PART OF LOTS 11, 12, 13, 14 & 15 CONCESSION (GEOGRAPHIC TOWNSHIP OF YARMOUTH IN THE CITY OF ST. THOMAS COUNTY OF ELGIN

The 152.3-hectare PowerCo Site is located south of Ron McNeil Line, within the northwest portion of the new industrial park. It is generally rectangular in shape.

Figure 2-1: Aerial of New Industrial Park and PowerCo Site



The City of St. Thomas owns the entirety of the new 614.8-hectare industrial park, with lands brought into the City's municipal boundary through the following annexations:

- Approximately 324 hectares annexed were from the Municipality of Central Elgin in 2022; and
- Approximately 283 hectares annexed were from the Municipality of Central Elgin through Bill 63 in March 2023.

While a large portion of the new industrial park and the PowerCo Site is currently designated for employment or industrial uses, most lands were being used for agricultural purposes, with some rural residential dwellings or farm homesteads:

- PowerCo Site: four (4) single-family houses, agricultural buildings and fields; and
- Remainder of new Industrial Park: five (5) single-family houses, agricultural buildings and fields.

A section of the OSR rail line runs through the northwest portion of the new industrial park. Edgware Line currently runs east-west through the centre of the new industrial park. This road is being reconfigured as part of the new internal road network for the industrial park.

Through Railway City Transit (RCT), the City of St. Thomas provides a conventional transit system with five (5) bus routes, a paratransit system for people with accessibility limitations and on-demand transit. The closest existing bus stops to the new industrial park are on Route 1 – Northside Route, approximately 1 km west. The new Industrial Park is within the on-demand zone. St. Thomas has an extensive active transportation system, but currently, there are no dedicated cycling lanes or trails abutting or within the new industrial park. As further described in Section 3 of this report, transit and cycling infrastructure will be extended to service the new industrial park.

As shown above in **Figure 2-1**, a number of woodlots were located within the new industrial park. Approvals have been obtained to clear all but the approximately 9.69 hectare of woodlot. There were a few minor watercourses and drainage features supporting past farming practices which have been removed. Additional information on the development is provided in Section 3 of this report. Currently, work is underway to clear and grade the PowerCo Site, and the remainder of the new industrial park. All of the existing residential dwellings and agricultural buildings will be demolished.

2.2 Surrounding Context

As shown in **Figure 2-2**, the following land uses are currently located adjacent to or immediately surrounding the new industrial park:

- North: Ron McNeil Line / Highway 52, agricultural land and associated buildings and four (4) houses;
- East: Yarmouth Centre Road, agricultural land and associated buildings and four (4) houses;
- South: CN rail line and agricultural land; and
- West: Highbury Avenue South, Centennial Avenue, OSR rail line, the Elgin Middlesex Pumping Station, various industrial and commercial buildings, vacant land and one (1) house.

Within a broader 500-metre radius surrounding the new industrial park, lands to the north and east, which are located within the Municipality of Central Elgin, are primarily agricultural with some rural residential. To the south, also within Central Elgin, are lands designated 'Major Industrial' but is currently being used for agricultural purposes, followed by commercial and light industrial uses along Talbot Line (Highway 3). Lands to the west are primarily industrial (developed and some vacant land), with many businesses related to the automotive industry and warehousing. At the north, lands west of Highbury Avenue South contain natural open space, single-family residential, parkland and some commercial retail.

There are a few active development applications within 500 metres of the new industrial park. At 340 Highbury Avenue, approximately 20 metres west of the new industrial park, Site Plan Approval was recently granted for a small commercial plaza. A number of Minor Variance applications are seeking parking reductions for new industrial development (e.g. at 70 Dennis Road, 45 Highbury Road, 131 South Edgeware Road and 258 Edward Street).

The Municipality of Central Elgin did recently approve an amendment to the Township of Yarmouth Zoning By-law No. 1998 to rezone approximately 140 hectares of lands directly south of the new industrial park, between Talbot Line (Highway 3) and the Canada Southern Rail Line and Centennial Avenue and Yarmouth Centre Road, to position the land for future industrial development.

Within the context of the larger surrounding area, the new industrial park and PowerCo Site are well-positioned to be served by a range of commercial, retail and other major services and infrastructure that exist in the City of St. Thomas and adjacent municipalities. For example:

- The St. Thomas Municipal Airport is located approximately 3 km southeast;
- Downtown St. Thomas is located approximately 6 km southwest;

- Highway 401 is located approximately 15 km north; and
- The City of London is less than 10 km northwest (e.g. approximately 6 km to the municipal boundary and approximately 30 km to the downtown).

Figure 2-2: Surrounding Land Uses to the Industrial Park



3 Development Plan

The development includes two main components consisting of (a) a new industrial park, and (b) the PowerCo site. As mentioned above, a portion of the planning approvals needed to finalize this project have already been granted through the MZO and Draft Plan of Subdivision processes. The details of the development approved through these processes, and being considered through the current Official Plan House-Keeping Amendment process are described herein.

3.1 Overview of Development

An employment land needs assessments undertaken in 2018 by Dillon Consulting with Watson and Associates Economists Ltd. identified a deficit of employment land in the City of St. Thomas and the need for additional employment lands to accommodate future growth and economic development. To address this, the City of St. Thomas has compiled a total of 614.8 gross hectares of land to establish a new industrial park to meet economic growth forecasts and attract and accommodate the new PowerCo EV battery manufacturing plant and other industries.

A growth management and employment land needs assessment undertaken by Arcadis in September 2023 concluded that the entirety of the 614.8 hectare new industrial park, plus additional land elsewhere in the City, is required to accommodate PowerCo and the resulting indirect and induced jobs and other anticipated employment growth through to 2041. The assessment concluded that no other opportunity exists within the City to satisfy the PowerCo land requirements and associated market demand for employment land.

The PowerCo plant will be located on a 152.3 net hectare parcel within the new industrial park. As shown in **Table 1**, the remainder of the industrial park (covered under the approved Draft Plan) will accommodate roads and servicing infrastructure, a range of supporting or related industrial businesses and other industrial development and accessory commercial retail services to serve the industrial park workers, and some natural open space. A conservative estimate assumes the total gross floor area within the new industrial park at full-build out may be up to 2.14 million square metres, while the PowerCo site alone will total 1.39 million square metres.

Table 1: Industrial Park Land Area and Future Industrial Development

	Net Developable Area (Net Hectare)	% of the Subdivision Area	Estimated Development (square metres)
PowerCo Site (Excluded from the Draft Plan of Subdivision)	152.3	24.7%	1,393,545
Blocks for Future Industrial and Accessory Commercial Development (Addressed Through the Draft Plan of Subdivision)	317.8	51.7%	745,559
Lands for Infrastructure and Natural Heritage (Addressed through the Draft Plan of Subdivision)	144.7	23.6%	N/A
Total New Industrial Park	614.8	100%	2,139,104

Notes: The estimated development for the remainder of the new Industrial Subdivision is based on the 102 m² per industrial employee standard set in the City of St. Thomas 2020 Development Charge Background Study and the 23 jobs per net hectare and 102 m² per employee standards set in the 2018 City of St. Thomas Employment Land Review. The net land area is subject to change based on ongoing engineering and Draft Plan of Subdivision work.

As identified in **Table 1**, 317.8 hectares of the total 614.8 hectares is available for industrial development and could accommodate suppliers of PowerCo or other industrial uses. Accessory commercial uses may also be permitted to serve the businesses and employees of the new industrial park. The blocks have been sized to ensure they are large enough to accommodate major new developments and to provide maximized flexibility for future development and suit respective users/needs. The blocks created through this subdivision could be further subdivided in the future, if necessary.

Of the lands identified in **Table 1** for infrastructure and natural heritage, 41.89 hectares of the 144.7 hectares will be used for woodland retention and re-naturalization. **Figure 3-1** provides an overview of the 41.89 hectares of land. The woodland being retained south of the PowerCo site is 9.69 hectares in size and will be designated and zoned

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Prepared for the City of St. Thomas

to ensure long-term protection of this feature, as shown on **Figure 1-2**. Additionally, the woodland and naturalization blocks (32.2 hectares) located in the northern portion of the lands will provide a buffer between the future industrial uses and the rural lands to the north along Ron McNeil Line.

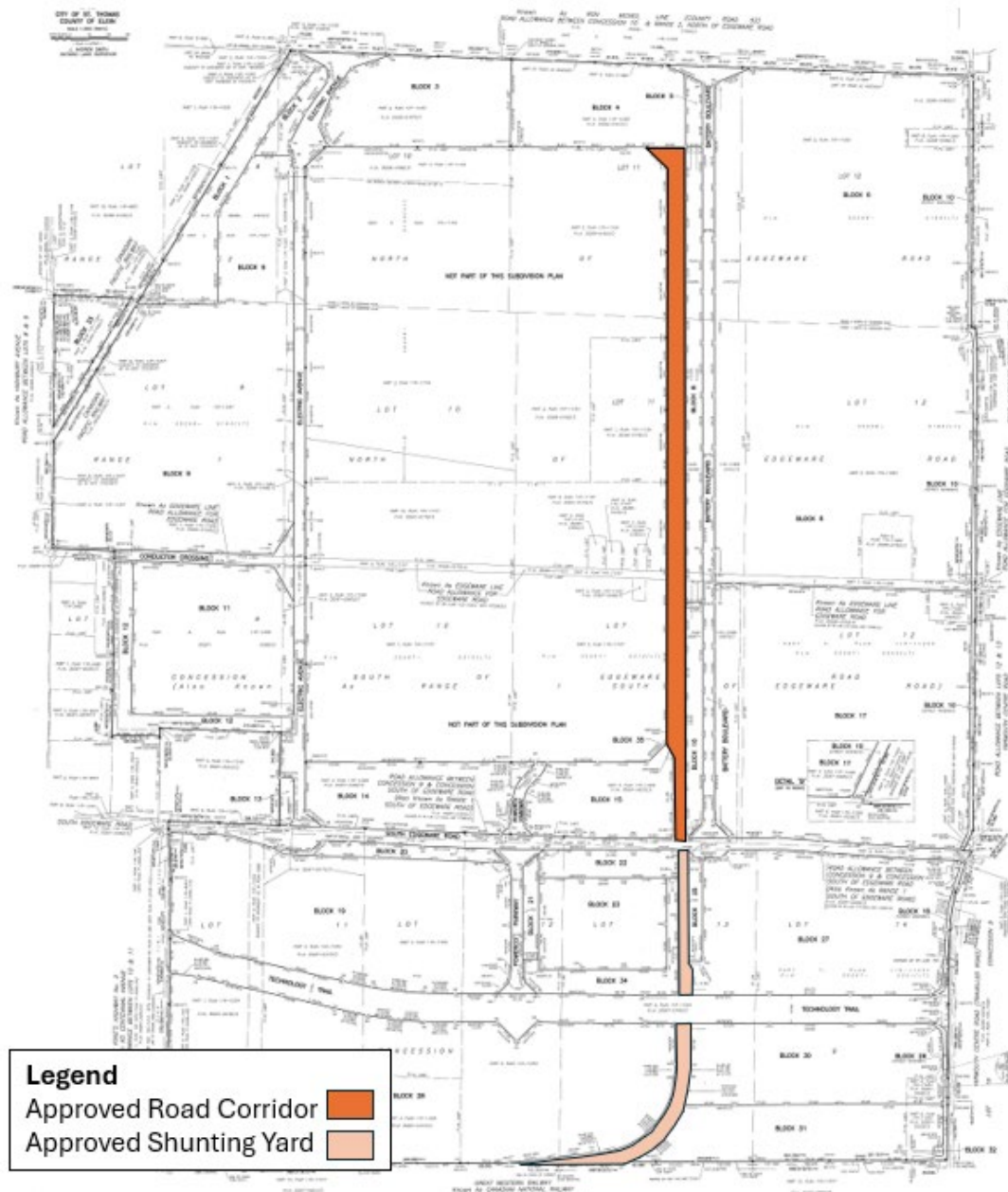
Figure 3-1: Draft Plan of Subdivision –Blocks for Woodlands and Naturalized Area



The approved plan of subdivision established a road network that encompasses a mix of existing and new roads. For the existing road network, South Edgeware Road is maintained south of the PowerCo site whereas the right-of-way (ROW) for Edgeware Line was divided to accommodate the PowerCo site in the central portion of the overall lands. Six (6) new streets are proposed, as shown on **Figure 3-2**.

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Figure 3-3: Draft Plan of Subdivision –Railway Blocks

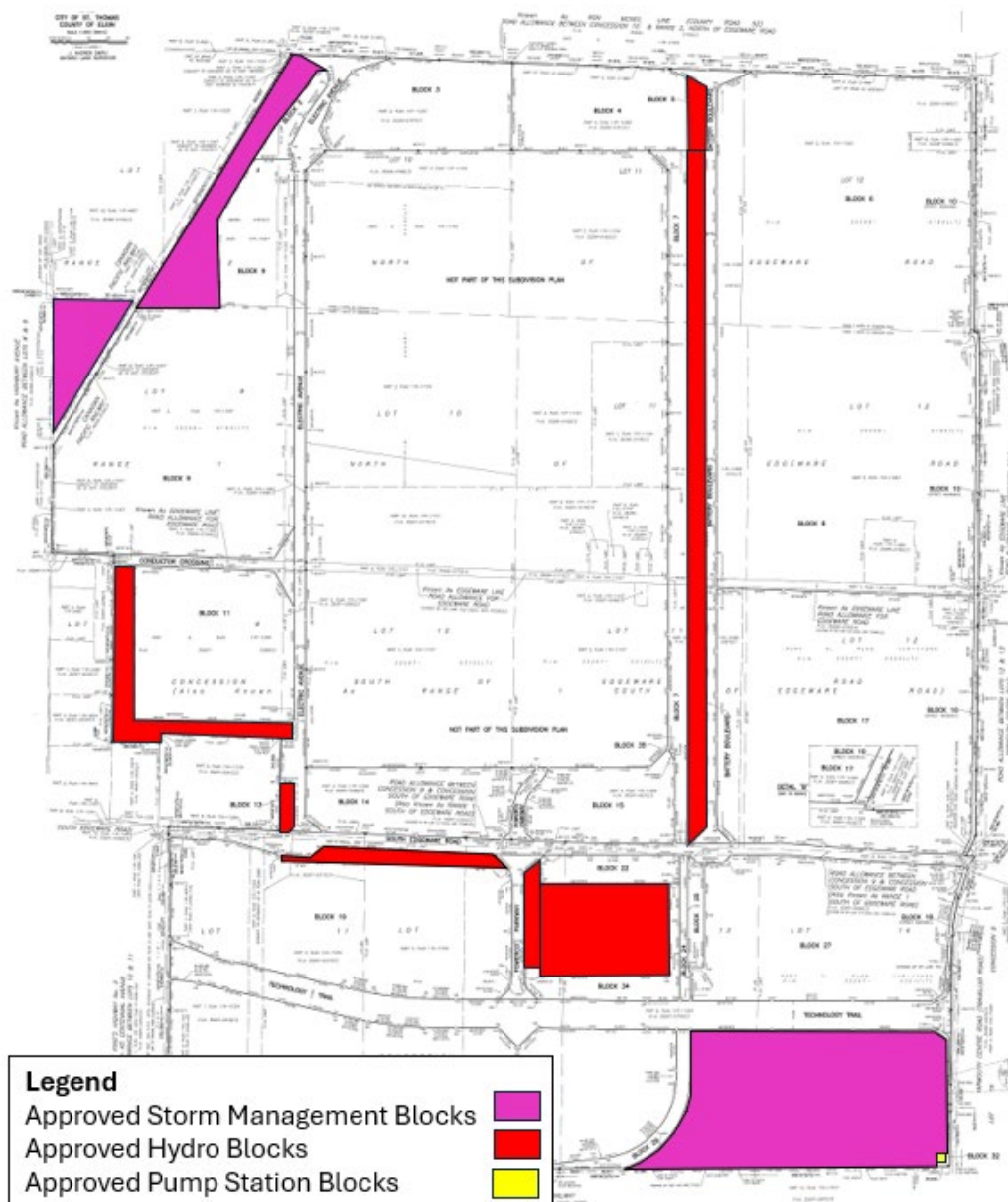


3.3 Overview of Servicing

The approved Draft Plan established blocks for new municipal servicing and utilities to service the industrial park and its' users. The infrastructure being utilized for this development is identified on **Figure 3-4** and is comprised of:

- Stormwater Management Facilities: Four (4) stormwater management ponds totalling an area of 31.0 hectares are proposed on Blocks 1, 19, 33 and 36. Additionally, Block 31 will be established for a drainage channel to support the function of the storm pond in Block 33;
- Sanitary Pumping Station: Block 34, which has an area of 625 square metres;
- Hydro One Transmission Station: Block 24, which has an area of 8.1 hectares, has been established to accommodate a Hydro One transmission station; and
- Hydro Corridor: Blocks 13, 14, 21, 22, 26, 17, 8 and 5 which total 16.7 hectares are for the hydro utility lines to establish access connections to the subdivision, connect to the transmission station and serve all future industrial developments.

Figure 3-4: Draft Plan of Subdivision –Blocks for Servicing and Utilities



4 Planning Policy and Regulatory Framework

This section provides a summary of the planning policy documents, regulations and guidelines that currently govern land use and development within the new industrial park and the PowerCo Site. It also describes how the development as a whole supports provincial and municipal policies and planning objectives.

4.1 Planning Act

The Planning Act, R.S.O. 1990, c. P.13 (the “Act”), last consolidated January 1, 2025, deals with land use planning in Ontario and outlines how land is controlled and the roles of various levels of government and the public in regard to land use matters. It is intended to provide the basis from which municipalities may approve regulations related to land use development.

Section 2 of the Act sets out various “Matters of Provincial interest” which decision makers must have regard to in carrying out their duties under the Act, such as:

- a) *the protection of ecological systems, including natural areas, features and functions;*
- b) *the protection of the agricultural resources of the Province;*
- c) *the conservation and management of natural resources and the mineral resource base;*
- d) *the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- e) *the supply, efficient use and conservation of energy and water;*
- f) *the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- g) *the minimization of waste;*
- h) *the orderly development of safe and healthy communities;*
 - (h.1) *the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;*
- i) *the adequate provision and distribution of educational, health, social, cultural and recreational facilities;*
- j) *the adequate provision of a full range of housing, including affordable housing;*
- k) *the adequate provision of employment opportunities;*
- l) *the protection of the financial and economic well-being of the Province and its municipalities;*
- m) *the co-ordination of planning activities of public bodies;*
- n) *the resolution of planning conflicts involving public and private interests;*
- o) *the protection of public health and safety;*
- p) *the appropriate location of growth and development;*
- q) *the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- r) *the promotion of built form that,*
 - a. *is well-designed,*
 - b. *encourages a sense of place, and*
 - c. *provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;*
- s) *the mitigation of greenhouse gas emissions and adaptation to a changing climate.*

The industrial park has regard for matters of provincial interest, particularly the provision of adequate employment land, economic development, the appropriate location of growth and development, mitigation of greenhouse gas emissions and adaption to a changing climate. The City and its technical consultants have worked closely with provincial and federal agencies to ensure the appropriate means for any removal and ongoing protection of natural heritage/ecological systems.

As detailed in section 1.1 of this report, the industrial park received approval of a Minister's Zoning Order as Ontario Regulation 324/24. This approval followed the process outlined in Section 47 of the Act as the development is a major economic initiative that requires circumvention of local planning processes in order to meet important development timelines and production targets.

Further approvals came under Section 51(24) of the Act, where the criteria for approval a new Draft Plan of Subdivision were regarded under the following criteria:

- (a) the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;*
- (b) whether the proposed subdivision is premature or in the public interest;*
- (c) whether the plan conforms to the official plan and adjacent plans of subdivision, if any;*
- (d) the suitability of the land for the purposes for which it is to be subdivided;*
 - (d.1) if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;*
- (e) the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;*
- (f) the dimensions and shapes of the proposed lots;*
- (g) the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;*
- (h) conservation of natural resources and flood control;*
- (i) the adequacy of utilities and municipal services;*
- (j) the adequacy of school sites;*
- (k) the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;*
- (l) the extent to which the plan's design optimizes the available supply, means of supplying, efficient use and conservation of energy; and*
- (m) the interrelationship between the design of the proposed plan of subdivision and site plan control matters relating to any development on the land, if the land is also located within a site plan control area designated under subsection 41 (2) of this Act or subsection 114 (2) of the City of Toronto Act, 2006. 1994, c. 23, s. 30; 2001, c. 32, s. 31 (2); 2006, c. 23, s. 22 (3, 4); 2016, c. 25, Sched. 4, s. 8 (2).*

It is our professional planning opinion that the development has regard for the matters contained within the Act and is consistent with the vision relevant policies as well as current and expected regulations.

4.2 Provincial Planning Statement

The new Provincial Planning Statement (PPS) took effect on October 20, 2024, and consolidates both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (the “Growth Plan”), for a streamlined province-wide land use planning policy framework that builds upon housing-supportive policies. Previously, the City of St. Thomas was located in an area not governed by the Growth Plan, and as such new policies apply to the lands that form part of this application.

The PPS provides policy direction on “Matters of Provincial Interest” related to land use planning and key land use planning issues by promoting more housing, building strong communities, a clean and healthy environment, and supporting sustainable economic growth by directing development to existing settlement areas, encouraging efficient and cost-effective land use development patterns, and protecting natural resources for the long term.

The PPS is to be read in its entirety and applicable policies are to be applied to specific situations/applications. Arcadis has considered the PPS in its entirety, and the following sections and policies of the PPS are of particular relevance to the new industrial park and PowerCo plant:

Building Homes, Sustaining Strong and Competitive Communities

2.3 Settlement Areas and Settlement Area Boundary Expansions

The PPS provides direction for focusing growth and development to settlement areas, and the expansion of settlement boundaries when there is a demonstrated need and benefit.

2.3.1.1 Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.

2.3.1.2 Land use patterns within settlement areas should be based on densities and a mix of land uses which:

- a) efficient use land and resources;*
- b) optimize existing and planned infrastructure and public service facilities;*
- c) support active transportation;*
- d) area transit-supportive, as appropriate; and*
- e) are freight-supportive*

2.3.2.1 In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:

- a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;*
- b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;*
- c) where the applicable lands comprise speciality crop areas;*
- d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;*
- e) whether the new or expanded settlement area complies with the minimum distance separation formulae;*

- f) *whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and*
- g) *the new or expanded settlement area provides for the phased progression of urban development.*

2.3.2.2 Notwithstanding policy 2.3.2.1 b), planning authorities may identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities to support development are planned or available.

Prior to initiating this project, the City retained a consultant to undertake an analysis of the available employment/industrial land supply within the City limits. The results of this analysis found that there was an insufficient supply therefore the City moved to obtain more lands from the neighbouring municipality of Central Elgin. Upon annexation of these lands, they were added into the settlement area for the City. Together with the existing lands, this area represents an appropriate location for employment/industrial growth as it is an efficient use of land and resources, and an ideal location for this form of development in proximity to the broader market. In this sense, the subject lands form an area that is strategic for growth, addressing policies contained under Section 2.4.

2.4.1.1 Planning authorities are encouraged to identify and focus growth and development in strategic growth areas.

2.4.1.2 To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-used development, strategic growth areas should be planned:

- a) *to accommodate significant population and employment growth;*
- b) *as focal areas for education, commercial, recreational, and cultural uses;*
- c) *to accommodate and support the transit network and provide connection points for inter- and intra-regional transit; and*
- d) *to support affordable, accessible, and equitable housing.*

2.8 Employment

The PPS contains policies aimed at achieving growth for both housing and employment to ensure strength and competitiveness in the broader economy. Where there is suitable land available for employment, these policies aim to protect and preserve these areas for current and future uses.

2.8.1.1 Planning authorities shall promote economic development and competitiveness by:

- a) *providing for an appropriate mix and range of employment, industrial, and broader mixed uses to meet long-term needs;*
- b) *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) *identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d) *encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
- e) *addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*

- 2.8.2.1 Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.*
- 2.8.2.1 Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.*
- 2.8.2.3 Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:*
- a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
 - b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
 - c) prohibiting retail and office uses that are not associated with the primary employment use;*
 - d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and*
 - e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.*
- 2.8.2.4 Planning authorities shall assess and update employment areas identified in official plans to ensure that this designations appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planning uses and function of these areas.*

As noted above, the employment area for these lands has been established through previous studies and been approved for employment/industrial uses through an MZO process detailed in Ontario Regulation 324/24. This report has been prepared to ensure that the appropriate land use designation is captured within the City's Official Plan for the existing land within the City's limits as well as the addition of the annexed land. The industrial park has been designed to accommodate the PowerCo site as well as additional employment and industrial uses to provide for a broad range of businesses on market-ready properties.

Infrastructure and Facilities

Chapter 3 contains policies that ensure proper infrastructure and facilities are in place for development in the form of transportation networks (including rail), water and wastewater management, waste and energy, and public spaces.

- 3.1.1 Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.*
- 3.2.2 As part of a multimodal transportation system, connectivity within and amongst transportation systems and modes should be planned for, maintained and, where possible, improved, including connections which cross jurisdictional boundaries.*
- 3.4.1 Planning for land uses in the vicinity of airports, rail facilities and marine facilities shall be undertaken so that:*
- a) their long-term operation and economic role is protected; and*

- b) airports, rail facilities and marine facilities, and sensitive land uses are appropriately designed, buffered and/or separated from each other, in accordance with policy 3.5.*

- 3.6.2 Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection fo the environment and minimize potential risks to human health and safety. For clarity, municipal sewage services and municipal water services include both centralized servicing systems and decentralized servicing systems.*

The industrial park was chosen as an appropriate location due to its' direct connection to multi-modal transportation networks including the Ontario 400 series highway connections, railines, and proximity to international borders. Technical studies were prepared as part of the original approvals process to ensure appropriate services have been provided to accommodate the development.

Wise Use and Management of Resources

While the earlier policies of the PPS give consideration for planning strong forms of development, this Chapter aims to protect and appropriately plan around other valuable resources such as natural heritage and agriculture.

- 4.1.5 Development and site alteration shall not be permitted in:*

- a) significant wetlands in the Canadian Shielf north of Ecoregions 5E, 6E and 7E;*
- b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);*
- c) significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);*
- d) significant wildlife habitat;*
- e) significant areas of natural and scientific interest; and*
- f) coastal wetlands in Ecoregions 5E, 6E, and 7E that are not subject to policy 4.1.4 b)*

unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

- 4.3.1.1 Planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically contiuous agricultural land base and supprt and foster the long-term economic prosperity and productive capacity of the agri-food network.*

- 4.6.2 Planning authorities shall not permit development and site alteration on lands containing archaeological resources o areas of archaeological potential unless the significant archaeological resources have been conserved.*

As part of the original approvals, technical studies were prepared to ensure appropriate protection of natural areas, transition from agriculture lands, and protection of archaeological resources.

Based on our analysis, the proposed redevelopment is consistent with policies of the PPS, 2024.

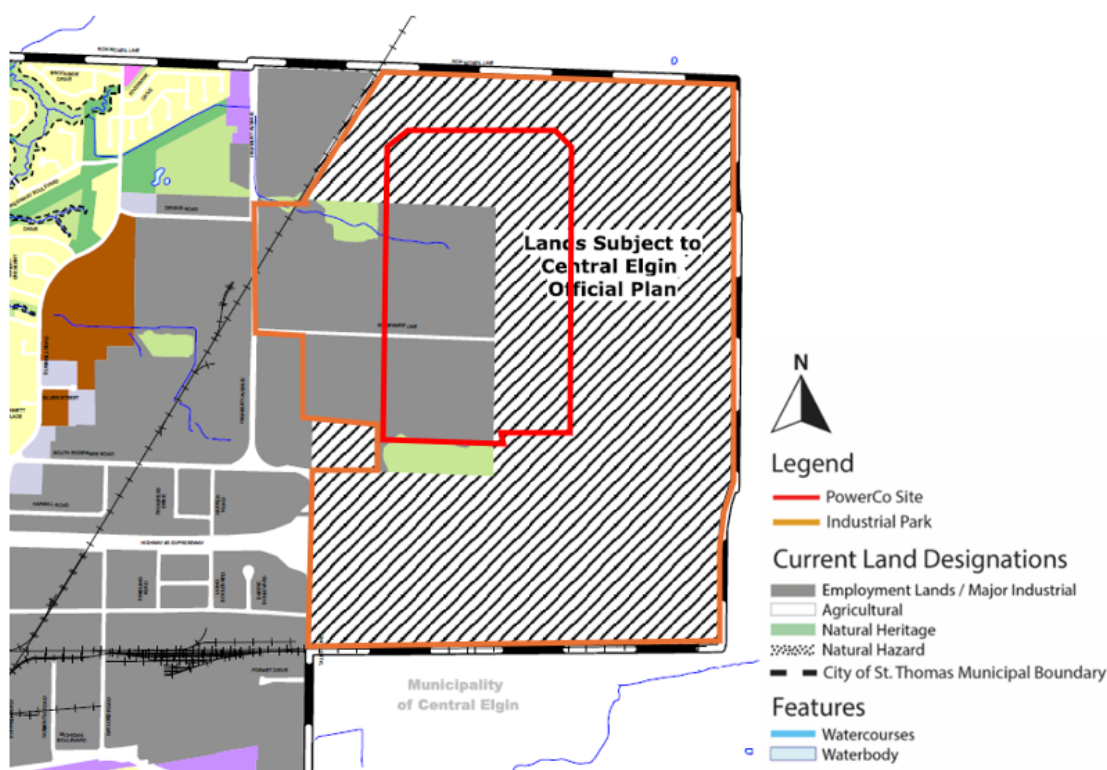
4.3 City of St. Thomas Official Plan

The City of St. Thomas Official Plan ("OP") was adopted by City Council and approved by Ministry of Municipal Affairs and Housing in 1963. The OP has been amended over time to reflect changes in provincial policy and captures amendments, up to OPA No. 110. The City of St. Thomas is currently reviewing and updating its OP to provide direction through 2046. The final updated OP is anticipated to be presented to the Council for Adoption in early 2025. The proposed redesignation of the industrial park lands will be reflected in the new updated OP, as detailed in this report.

Furthermore, on March 2, 2023 Bill 63, which adjusted the boundary between the City of St. Thomas and the Municipality of Central Elgin, obtained Royal Assent. Bill 63 stipulates that, “The official plan of the Municipality of Central Elgin in respect of the annexed area is deemed to be an official plan of the City of St. Thomas on the effective date, and remains in force until it is revoked or amended to provide otherwise”.

To address Bill 63 and Ontario Regulation 324/24, Schedule A is required to be amended to designate the land previously subject to the Central Elgin Official Plan as “Employment Lands” within the City of St. Thomas Municipal Boundary. **Figure 4-1** identifies the area that will be transitioned from the Municipality of Central Elgin to the City of St. Thomas.

Figure 4-1: Current Official Plan Designations



Policy 4.3.5 of the OP directs industrial uses and developments to be concentrated in the northeastern part of the City and adjacent to the railway right-of-way. **Figure 4-1** displays that the industrial park is located within the appropriate neighbourhood identified within the OP. Further, the land supply contained within the subject lands satisfies policy 4.3.10 directing the Council to ensure the City has a sufficient land supply for industrial uses for a twenty-year period, as demonstrated through the 2018 and 2023 lands needs assessments.

Section 5 of the OP provides policy direction for Employment Lands. Specifically, Policy 5.10.2 of the OP provides the following goals for Employment area:

- i. *to provide and maintain a sufficient supply of land, in amount and variety of sizes, to accommodate employment growth;*
- ii. *to monitor local, regional and provincial trends with respect to the demand for employment land to ensure that the City maintains an adequate supply in appropriate locations at all times;*

- iii. *to limit development in employment areas to industrial activities and operations supportive or compatible with industry as well as ancillary retail and service commercial uses that support the workers and uses in the employment areas;*
- iv. *to provide a range of employment opportunities for the City;*
- v. *to ensure in employment areas the requirements of industry remain paramount;*
- vi. *to provide appropriate locations for employment uses that have features that are not compatible with other adjacent sensitive land uses to relocate into the employment area;*
- vii. *to continue to support industrial development and promotion programs;*
- viii. *to protect and preserve employment lands in the long term;*
- ix. *to protect employment lands in proximity to goods movement facilities and transportation corridors.*

To achieve the City's employment goals, the OP includes the following detailed policies:

- 5.10.3.2 *The City will actively support and promote economic development through the implementation of their Economic Development Strategies and land banking where possible. The City will encourage economic activities in the areas of advanced manufacturing, life sciences, small knowledge-based business, information technology, business services and the environment as future opportunities for employment growth."*
- 5.10.3.3 *"Large format and stand-alone retail uses, shopping centres, home improvement centres and retail commercial strip development are not permitted within the Employment designations."*
- 5.10.3.6 *"Industrial operations shall comply with the applicable Ministry of Environment and Climate Change Guidelines for Compatibility Between Industrial Facilities and Sensitive Land Uses." The implementation of these guidelines shall be accomplished through the implementing zoning by-law and site plan approval.*

The industrial park satisfies all of the policies contained within the Sections referenced above. The employment land needs assessment undertaken in 2018 and re-visited in 2023 confirm the need for these additional lands and provides future and varied availability for employment/industrial uses across the industrial park.

As per policy 5.10.4, permitted uses in the Employment designation include:

- i. *industrial uses that involve assembling, fabricating, manufacturing, processing, repairing, warehousing, wholesaling and distribution uses, production of pharmaceuticals and medical products, communications, utilities, storage of goods and materials, service trades and construction uses; office uses including those accessory to industrial uses; research and information processing;*
- ii. *public and private recreation facilities, park and open space areas, public and institutional uses;*
- iii. *non-retail service commercial uses including but not limited to, restaurants, child care services, personal service uses, automotive body shops, automotive service uses, may be permitted on a limited basis provided the uses are compatible with the development and operation of industrial uses and serve the employment area;*
- iv. *gas and service stations including the sale of convenience goods and carwash provided they are located at an intersection of arterial or collector streets as shown on Schedule "B";*
- v. *transport trucking terminals are permitted but must front on or be near a road classified as an arterial or collector street on Schedule "B".*

As detailed within Ontario Regulation 324/24 for the MZO, the permitted uses conform to the employment uses listed within policy 5.10.4. The Regulation also specifies that Adult Entertainment Parlours are not permitted within the industrial park, despite OP policy 5.10.4.2:

5.10.4.2 *Licensed Adult Entertainment Parlours are permitted within the “Employment” designation on Schedule “a”, only in free standing, single use structures, provided that such uses when established are located no closer than 500 metres measured in a continuous path over the shortest distance, from a church, a school, a day nursery that is a main permitted use in the Zoning By-law, or a public park or a Residential or Open Space and Park zone and shall be dispersed.*

In addition to Schedule A, Schedules B and D are also required to be updated to reflect the addition of these lands within the City limits. Schedule B identifies the transportation network and Schedule D identifies the “Community Improvement Area”.

A final Registered Plan (R-Plan 11M-173) was certified with the Registry Office on February 3, 2025 and shall form the basis for updating the transportation network shown on Schedule B.

Schedule D captures the entirety of the City of St. Thomas within the “Community Improvement Plan” and with the addition of the annexed lands into the Municipal Boundary, these lands shall also be captured and reflect on this Schedule.

Schedule E appropriately reflects the Natural Heritage features maintained within the industrial park and does not require modifications for the subject lands. Section 8.3 provides policies to ensure consideration for and protection of features within this designation, as follows:

- i. *“Habitat of Endangered Species or Threatened Species: as identified by the Ontario Ministry of Natural Resources’ official species at risk list, as updated from time to time;*
- ii. *Significant Wetlands: as identified by the Ministry of Natural Resources and/or the local Conservation Authority;*
- iii. *Areas of Natural and Scientific Interests (ANSI’s), Life Science, (Provincial and Regional): as identified by the Ministry of Natural Resources;*
- iv. *Significant Valleylands: as identified by the Municipality in cooperation with the local Conservation Authority;*
- v. *Significant Wildlife Habitats: as identified by the Ministry of Natural Resources, the appropriate Conservation Authorities and/or the Municipality;*
- vi. *Fish Habitats: as identified by the local conservation authority in cooperation with the Federal Department of Fisheries and Oceans;*
- vii. *Significant Woodlands: as identified by the Municipality in cooperation with the local Conservation Authority; and*
- viii. *Environmentally Sensitive Areas (ESA’s): as identified by the appropriate Conservation Authority.”*

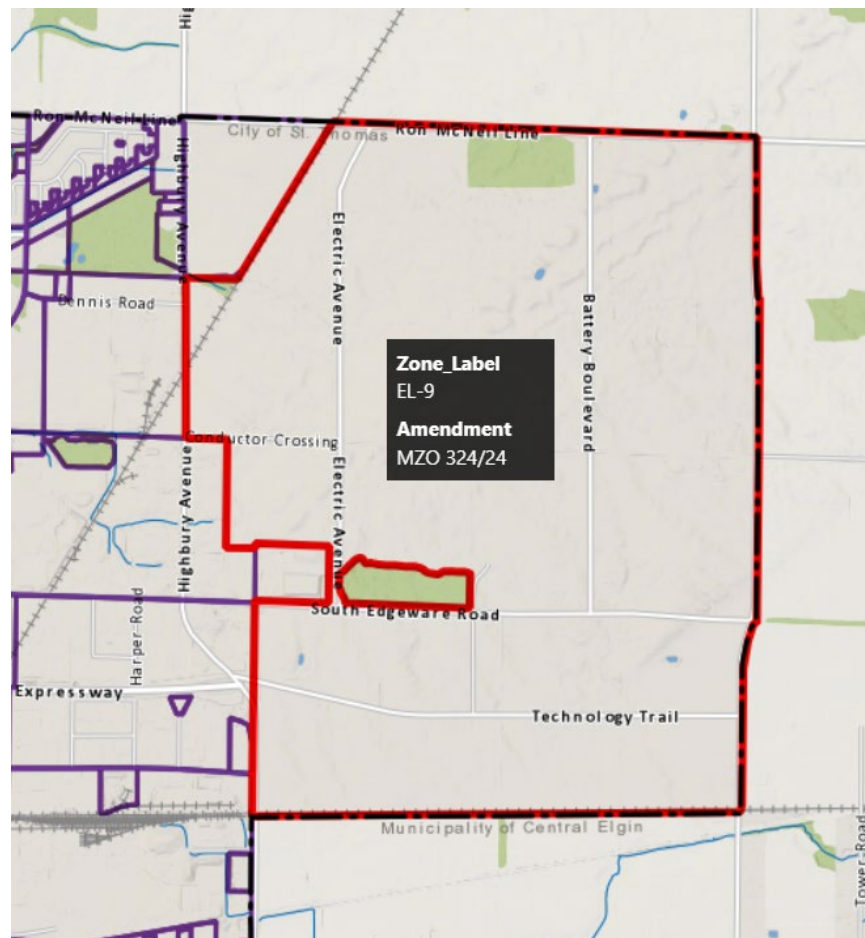
As per policy 8.3.2.2 permitted uses within the Natural Heritage designation are passive open space, walking/biking trails, forest and resource management uses, conservation uses, erosion and flood control, low-intensity public and private recreation uses, necessary public utilities, infrastructure and services, existing agricultural use and accessory buildings and structures thereto. Development and/or site alteration associated with a permitted use shall only be permitted when it can be demonstrated in accordance with the policies of subsection 8.3.4 of this Plan, that there will be no negative impacts on the natural heritage features and/or their ecological functions.

The house-keeping amendment proposed conforms to the policies and intent of the City of St. Thomas Official Plan, and ensures that this guiding document adequately reflects the approval received through the MZO process and detailed within Ontario Regulation 324/24.

4.4 City of St. Thomas Zoning By-Law

The City of St. Thomas Zoning By-law 50-88 was amended through an approved MZO and detailed in Ontario Regulation 324/24. MZO Map No. 348, **Figure 1-2**, delineates the approved zoning for these lands, which has been reflected within the City's Zoning By-law and on their zoning shown, as shown on **Figure 4-2**. The industrial park will continue to comply with the uses and permissions issued under the MZO within the Employment Lands EL-9 zone.

Figure 4-2: Existing Zoning



5 Conclusion

The purpose of this report is to bring the City of St. Thomas Official Plan into conformity with the approval issued at a Provincial level through the Minister Zoning Order process and issuance of Ontario Regulation 324/24.

The subject lands have been thoroughly reviewed through numerous studies over the years to ensure proper planning was considered and implemented to permit employment/industrial development. Overall, the industrial park meets provincial and local targets for employment growth and creates attraction of global industry for the Province of Ontario and City of St. Thomas. The scale of this development is ground-breaking for the overall region of south-western Ontario and provides opportunity for regional connections along the 400-series highway and railways.

This area of the City has been a long-term focus for industrial and employment development due to its' proximity to the airport and rail, separation from sensitive land uses. The land needs assessments completed in 2018 identified that this area did not provide sufficient land supply for long-term growth, and therefore resulted in the annexation of neighbouring lands from the Municipality of Central Elgin. Following the annexation of these lands, the 2023 study confirmed that these lands were the only suitable location to accommodate the PowerCo site and the surrounding industrial park to achieve part of the City's targets for industrial growth.

For these reasons, and based on the analysis contained herein, it is our opinion that the development and proposed house-keeping Amendment:

- Has regard for the Planning Act;
- Is consistent with the Provincial Planning Statement;
- Conforms to the intent and policies within the City of St. Thomas Official Plan;
- Complies with the City of St. Thomas Zoning By-law, as modified by Ontario Regulation 324/24; and
- Facilitates the development of vacant and underutilized employment land and provides additional land for employment uses to meet the City's forecasted needs.

Respectfully submitted this 10th day of February 2025.

Regards,

ARCADIS



Stefanie Pratt, BSc



Amy Shepherd, BSc, MCIP, RPP

I hereby certify that this Planning Justification Report was prepared by a Registered Professional Planner, within the meaning of the Ontario Professional Planners Institute Act, 1994, and is for the Industrial Park in St. Thomas, including the PowerCo Site, only.

Arcadis Professional Services (Canada) Inc.
350 Oxford Street West, Suite 203
London, Ontario N6H 1T3
Canada
www.arcadis.com

Appendix A – Registered Plan 11M-273

PLAN OF SUBDIVISION
OF PART OF
LOTS 9, 10, 11, & 12
RANGE 2 NORTH OF
EDGEWARE ROAD
AND PART OF
LOTS 9, 10, 11, & 12
RANGE 1 NORTH OF
EDGEWARE ROAD
AND PART OF
ROAD ALLOWANCE FOR
EDGEWARE ROAD
AND PART OF
ROAD ALLOWANCE FOR
EDGEWARE ROAD
(CLOSED BY BY-LAW 120-2024, INSTRUMENT C7248125)
AND PART OF
LOTS 9, 10, 11, & 12
CONCESSION SOUTH OF
EDGEWARE ROAD
(Also Known As RANGE 1
SOUTH OF EDGEWARE ROAD)
AND PART OF
ROAD ALLOWANCE BETWEEN
CONCESSION 9 &
CONCESSION SOUTH OF
EDGEWARE ROAD
(Also Known As RANGE 1
SOUTH OF EDGEWARE ROAD)
(CLOSED BY BY-LAW 121-2024, INSTRUMENT C7248126)
AND PART OF
LOTS 11, 12, 13, 14, & 15
CONCESSION 9
(GEOGRAPHIC TOWNSHIP OF YARMOUTH)

OWNER'S CERTIFICATE
THIS IS TO CERTIFY THAT:
1) BLOCKS 1 TO 9, 11 TO 17, 19 TO 25, & 27 TO 35, THE STREETS, NAMELY
ELECTRIC AVENUE, BATTERY BOULEVARD, CONDUCTOR CROSSING, POWERED PARKWAY,
SOUTH EDGEWARE ROAD, & TECHNOLOGY TRAIL, THE STREET WIDENINGS, NAMELY BLOCKS
10, 18, & 26, HAVE BEEN Laid OUT IN ACCORDANCE WITH MY INSTRUCTIONS.
2) THE STREETS AND STREET WIDENINGS ARE HEREBY DEDICATED TO THE CORPORATION OF
THE CITY OF ST. THOMAS AS PUBLIC HIGHWAYS.

12/20/2024
DATE
The Corporation of the City of St. Thomas
Justin Lawrence
EXECUTIVE DIRECTOR - INDUSTRIAL DEVELOPMENT
I HAVE THE AUTHORITY TO SIGN
THE CORPORATION

SURVEYOR'S CERTIFICATE
I CERTIFY THAT:
1) THIS SURVEY AND PLAN ARE CORRECT AND IN ACCORDANCE WITH THE
SURVEY ACT, THE SURVEYORS ACT AND THE LAND TITLES ACT AND THE
REGULATIONS MADE UNDER THEM.
2) THE SURVEY WAS COMPLETED ON THE 8th DAY OF OCTOBER, 2024.

Dec. 20, 2024
DATE
J. A. Smith
ONTARIO LAND SURVEYOR
THIS PLAN OF SURVEY RELATES TO ADS PLAN SUBMISSION FORM NUMBER V-82005.

MONUMENT NOTES
ALL SET MONUMENTS SHOWN HEREON ARE IRON BARS (IBs) UNLESS OTHERWISE NOTED.

LEGEND
■ DENOTES SURVEY MONUMENT SET
■ DENOTES SURVEY MONUMENT FOUND
CC DENOTES CUT CROSS
IB DENOTES IRON BAR
OU DENOTES ORIGIN UNKNOWN
PB DENOTES PLASTIC BAR
RIB DENOTES 16mm DIAMETER ROUND IRON BAR
SCP DENOTES SPECIFIED CONTROL POINT
SD DENOTES STANDARD IRON BAR
SSB DENOTES SHORT STANDARD IRON BAR
WT DENOTES WITNESS
741 DENOTES D.I. HOUGHTON, O.L.S.
866 DENOTES D.G. HODGSON, O.L.S.
1017 DENOTES CALVIN DIETZ, O.L.S.
1350 DENOTES BRIAN VAUGHAN SURVEYING LIMITED O.L.S.
1402 DENOTES KIM HUSTON SURVEYING LTD. O.L.S.
ACM DENOTES ARCHIBALD, GRAY & MCKAY LTD. O.L.S.
MSS DENOTES MANAGEMENT BOARD SECRETARY (ONTARIO)
P1 DENOTES PLAN 11R-11263
P2 DENOTES PLAN 11R-11247
P3 DENOTES PLAN 11R-11286
P4 DENOTES PLAN 11R-11254
W DENOTES WITNESS
S DENOTES SET
CNS DENOTES COULD NOT SET MONUMENT
DUE TO ACTIVE CONSTRUCTION

NOTES
BEARINGS ARE UTM GRID DERIVED FROM SPECIFIED CONTROL POINTS
COORDINATES AND CORRECTIONS, UTM-17, NAD83/CSRS-CBN6-2010.0
ALL DIMENSIONS SHOWN ARE MEASURED, UNLESS OTHERWISE NOTED.
DISTANCES ARE GROUND AND CAN BE CONVERTED TO GRID BY MULTIPLYING BY
THE COMBINED SCALE FACTOR OF 0.9996.

INTEGRATION DATA

POINT ID	NORTHING	EASTING
SCP 0020060030	475915.457	485334.616
SCP 0020060032	475945.292	485373.066

PLAN COORDINATES, UTM ZONE 17, NAD83/CSRS-CBN6-2010.0

POINT	NORTHING	EASTING
1	4759795.608	489351.087
2	4759800.889	489367.256

COORDINATES CANNOT, IN THEMSELVES, BE USED TO
RE-ESTABLISH CORNERS OR BOUNDARIES SHOWN ON THIS PLAN

DETAIL 'C'
(NOT TO SCALE)

DETAIL 'A'
(NOT TO SCALE)

APPROVED UNDER SECTION 51 OF THE PLANNING ACT THIS
22nd DAY OF January, 2025

PLAN 11M-273
I CERTIFY THAT THIS PLAN IS REGISTERED IN THE LAND
REGISTRY OFFICE FOR THE LAND TITLES DIVISION OF ELGIN
AT 10:31 O'CLOCK ON THE 3rd DAY OF
February, 2025, AND ENTERED IN THE PARCEL REGISTER
FOR P.L.N. 35267-0317(LT), P.L.N. 35267-0318(LT), P.L.N. 35267-0319(LT),
P.L.N. 35267-0320(LT), P.L.N. 35267-0321(LT), P.L.N. 35267-0322(LT),
P.L.N. 35267-0323(LT), P.L.N. 35267-0324(LT), P.L.N. 35267-0325(LT),
P.L.N. 35267-0326(LT), P.L.N. 35267-0327(LT), P.L.N. 35267-0328(LT),
P.L.N. 35267-0329(LT), P.L.N. 35268-0181(LT), P.L.N. 35268-0182(LT),
P.L.N. 35268-0183(LT), P.L.N. 35268-0184(LT), P.L.N. 35268-0185(LT),
P.L.N. 35268-0186(LT), P.L.N. 35268-0187(LT), P.L.N. 35268-0188(LT),
P.L.N. 35268-0189(LT), P.L.N. 35268-0190(LT), P.L.N. 35268-0191(LT),
P.L.N. 35268-0192(LT), P.L.N. 35268-0193(LT), P.L.N. 35268-0194(LT),
P.L.N. 35268-0195(LT), P.L.N. 35268-0196(LT), P.L.N. 35268-0197(LT),
P.L.N. 35268-0198(LT), P.L.N. 35268-0199(LT), P.L.N. 35268-0200(LT),
AND THE REQUIRED CONSENTS ARE REGISTERED AS PLAN DOCUMENT
No. C7250704

REPRESENTATIVE FOR LAND REGISTRY FOR THE
LAND TITLES DIVISION OF ELGIN (No. 11)

THIS PLAN IS COMPOSED OF ALL OF P.L.N. 35267-0317(LT), 35267-0318(LT),
35267-0319(LT), 35267-0320(LT), 35267-0321(LT), 35267-0322(LT),
35267-0323(LT), 35267-0324(LT), 35267-0325(LT), 35267-0326(LT),
35267-0327(LT), 35267-0328(LT), 35267-0329(LT), 35268-0181(LT),
35268-0182(LT), 35268-0183(LT), 35268-0184(LT), 35268-0185(LT),
35268-0186(LT), 35268-0187(LT), 35268-0188(LT), 35268-0189(LT),
35268-0190(LT), 35268-0191(LT), 35268-0192(LT), 35268-0193(LT),
35268-0194(LT), 35268-0195(LT), 35268-0196(LT), 35268-0197(LT),
35268-0198(LT), 35268-0199(LT), & 35268-0200(LT).

PART OF BLOCK 1 SUBJECT TO EASEMENT AS IN INSTRUMENT V455565 & C7233477.
PART OF BLOCK 9 SUBJECT TO EASEMENT AS IN INSTRUMENT C7333477.
PART OF BLOCK 12 SUBJECT TO EASEMENT AS IN INSTRUMENT C7333477.
PART OF CONDUCTOR CROSSING SUBJECT TO EASEMENT AS IN INSTRUMENT C7333477.
PART OF SOUTH EDGEWARE ROAD, PART OF BLOCK 19, PART OF TECHNOLOGY TRAIL, &
PART OF BLOCK 28 SUBJECT TO EASEMENT AS IN INSTRUMENT C7333477.

