

REPORT TO COUNTY COUNCIL

Application for Official Plan Amendment OP 24-02-7 – Town of Tillsonburg

To: Warden and Members of County Council
From: Director of Community Planning

RECOMMENDATIONS

1. That Oxford County Council approve Official Plan Application OP 24-02-7, submitted by the Town of Tillsonburg for lands described as Lots 25 and 26 and Part of Willow Street, Plan 966, municipally known as 31 Earle Street Tillsonburg, to redesignate a portion of the subject lands from 'Low Density Residential' and 'Environmental Protection' to 'Medium Density Residential' with site specific policies to facilitate the development of a 4 storey, 47 unit apartment building on the subject lands;
2. And further, that Council approve the attached Amendment Number 347 to the County of Oxford Official Plan, as well as the enacting By-Law 6798-2026.

REPORT HIGHLIGHTS

- An application has been submitted by the Town of Tillsonburg to amend the Official Plan to facilitate the development of a four storey, 47-unit apartment building.
- The central portion of the subject lands is proposed to accommodate the development of a 47-unit apartment building containing affordable and attainable housing units in partnership with Oxford County's Human Services Department. The southern portion of the lands will remain as a woodlot and the northern portion, encompassing a former elementary school, will continue to be leased as a police training facility.
- Planning staff are recommending that the application be supported, as it is consistent with the policies of the Provincial Planning Statement and generally maintains the intent and purpose of the Official Plan with respect to the designation of additional areas for medium density residential development and the provision of affordable and attainable housing units.

IMPLEMENTATION POINTS

These applications will be implemented in accordance with the relevant objectives, strategic initiatives, and policies in the Official Plan.

Financial Impact

The approval of this application will have no financial impact beyond what has been approved in the current year's budget.

Communications

In accordance with the requirements of the Planning Act, notice of complete application regarding this proposal was provided to surrounding property owners on August 15, 2025, and notice of public meeting was issued on January 8, 2026.

Comments received with respect to this application are outlined in the Comments section of this report.

2023-2026 STRATEGIC PLAN

Oxford County Council approved the [2023-2026 Strategic Plan](#) on September 13, 2023. The Plan outlines 39 goals across three strategic pillars that advance Council's vision of "Working together for a healthy, vibrant, and sustainable future." These pillars are: (1) *Promoting community vitality*, (2) *Enhancing environmental sustainability*, and (3) *Fostering progressive government*.

The recommendations in this report supports the following strategic goals.

Strategic Plan Pillars and Goals

PILLAR 1	PILLAR 2	PILLAR 3
		
Promoting community vitality	Enhancing environmental sustainability	Fostering progressive government
Goal 1.1 – 100% Housed Goal 1.2 – Sustainable infrastructure and development Goal 1.3 – Community health, safety and well-being		

See: [Oxford County 2023-2026 Strategic Plan](#)

DISCUSSION

Background

Owners: Town of Tillsonburg (c/o Cephas Panschow)
10 Lisgar Avenue, Tillsonburg, ON N4G 5A5

Location:

The subject lands are described as Lots 25 & 26, and Part of Willow Street, Plan 966 in the Town of Tillsonburg. The subject lands are located on the south side of Earle Street, east side of Cedar Street and west side of Pine Avenue and are municipally known as 31 Earle Street, Town of Tillsonburg.

County of Oxford Official Plan:

Existing:

Schedule "T-1"	Town of Tillsonburg Land Use Plan	Residential
Schedule 'T-2'	Town of Tillsonburg Residential Density Plan	Low Density Residential and Environmental Protection
Schedule 'T-3'	Town of Tillsonburg Leisure Resources and School Facilities Plan	Public Elementary School

Proposed:

Schedule 'T-2'	Town of Tillsonburg Residential Density Plan	Medium Density Residential with special development policies (to apply to the approximately 0.53 ha area indicated in Attachment 2)
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Proposal:

Applications have been initiated by the Town of Tillsonburg to amend the County Official Plan and Town of Tillsonburg Zoning By-law to permit the construction of a four-storey apartment building containing 47 apartment units on a portion of the subject lands. The Official Plan amendment proposes to redesignate the central portion of the subject lands from 'Low Density Residential' and 'Environmental Protection' to 'Medium Density Residential' with special development policies to permit a higher net residential density than is currently permitted in the medium density residential designation. The northern portion of the lands will remain designated as 'Low Density Residential', no development is proposed on this portion of the lands at this time.

The subject lands are further designated as a 'Public Elementary School'. However, the former Elliot Fairbairn School on the subject lands was closed, and subsequently purchased by the Town of Tillsonburg in 2005. The amendment will remove the designation of the lands as a 'Public Elementary School' to reflect the closure of the school and Town's ownership of the lands.

Surrounding land uses include existing low density residential development consisting primarily of single detached dwellings, the former elementary school building which is being utilized as an OPP training facility, a locally significant woodlot which is located to the south of the proposed building that will remain and a significant woodland along Vienna Road, commercial uses along Simcoe Street, as well as industrial uses to the south of the subject lands.

Plate 1, Location Map with Existing Zoning, indicates the location of the subject site and the existing zoning in the immediate vicinity.

Plate 2, 2020 Aerial Map, provides an aerial view of the subject property and surrounding area.

Plate 3, Proposed Concept Plan, provides the layout of the proposed development and location of parking areas and the proposed area to be redesignated through the subject application. The townhouses shown on the applicant sketch are not part of the current application.

Plate 4, Comments from Traffic Engineer, provides a response and analysis from the consultant hired by the Town to facilitate the Town's Transportation Master Plan updates.

Comments

2024 Provincial Planning Statement (PPS)

The 2024 Provincial Planning Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. Under Section 3 of the *Planning Act*, where a municipality is exercising its authority affecting a planning matter, such decisions, "shall be consistent with" all policy statements issued under the Act. The following outlines the key PPS policies that have been considered, but is not intended to be an exhaustive list.

Section 2.2 of the PPS provides that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the immediate area by:

- a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;
- b) permitting and facilitating:
 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and
 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites for residential

use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;

- c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and
- d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

Section 2.2.1- Housing provides that Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options, including affordable housing needs;
- b) permitting and facilitating:
 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including *additional needs housing* and needs arising from demographic changes and employment opportunities; and
 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g. shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;
- c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation.

Section 2.3.1 of the PPS indicates that settlement areas shall be the focus of growth and development and land use patterns within settlement areas shall be based on densities and a mix of land uses which;

- a) Efficiently use land and resources;
- b) Optimize existing and planned infrastructure and public service facilities;
- c) Support active transportation;
- d) Are transit-supportive as appropriate, and
- e) Are freight supportive.

Section 2.3.1.3 also directs that planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritize planning and investment in infrastructure and public service facilities.

Section 4.1 of the PPS speaks to Natural Heritage, indicating that areas containing significant natural heritage shall be protected for the long term and the diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages

between and among natural heritage features and areas, surface water features and ground water features.

[County of Oxford Official Plan](#)

Section 2.1.1 of the Official Plan provides that growth and development will be focused in settlement areas and their vitality and regeneration will be promoted. Development will be directed to settlements with centralized wastewater and water supply facilities to minimize risks of contamination to air, land, surface water and groundwater, to preserve agricultural land and to reduce the cost of public service facilities and infrastructure. Settlements will be required to develop with land use patterns and a mix of uses and densities that efficiently use land and resources, are appropriate for, and efficiently use, existing or planned infrastructure and public service facilities, support active transportation and minimize negative impacts to air quality and climate change and promote energy efficiency.

Additionally, all forms of housing are required to meet the social, health and well-being needs of current and future residents which will be facilitated through the County. A minimum target of 20 percent shall be established as the proportion of all housing in the County which is to be affordable.

Intensification will be promoted in appropriate locations within settlements, particularly those served by centralized wastewater and water supply facilities and all forms of housing required to meet the social, health and well-being needs of current and future residents will be permitted and facilitated in appropriate locations throughout the County.

Section 8.2.2.1 ensures that adequate affordable housing for low and moderate income households and those with special needs are available in the Town.

Section 8.2.2.2 – Tenure and Mix, provides that it is an objective of the Official Plan to provide a range of tenure forms throughout the Town, consistent with the demand, and to maintain an appropriate supply of affordable rental and ownership housing in the Town, while recognizing that housing needs to be suitably maintained and adequate for habitation. Town Council shall encourage the creation of housing opportunities that may result in a mix of tenure forms, such as ownership, rental and cooperative, throughout the Town. Such encouragement will include the provisions of opportunities for the development of a variety of housing forms and by permitting sensitive infilling and accessory apartments in built-up areas.

The subject lands are designated as "Residential" on the Town of Tillsonburg Residential Land Use Plan. However, it is noted the lands are not currently identified with a specific residential density on the Town of Residential Density Plan, due to its current designation as a 'Public Elementary School'. As such, Planning staff have interpreted the current residential density designation of the site to be 'Low Density Residential' in keeping with the residential density of the surrounding residential lands to the north, east and west. The subject lands are designated 'Low Density Residential', according to the Town of Tillsonburg Residential Density Plan. The subject application proposes to redesignate the lands to facilitate medium density residential development.

Areas designated for Low Density Residential use are generally intended to provide a variety of low-rise, low-density housing forms. In these Districts, it is intended that there will be a mixing and integration of different forms of housing to achieve a low overall density of use.

The maximum net residential density for an individual development in the Low Density Residential District is 30 units per hectare (12 units per acre) and the minimum net residential density shall be 15 units per hectare (6 units per acre).

Areas designated for Medium Density Residential uses are primarily developed or planned for low profile municipal unit development that exceed densities established for Low Density Residential Districts. These districts are intended to include townhouses, converted dwellings and apartment buildings. In these Districts, it is intended that there will be a mixing and integration of different forms of housing to achieve a medium overall density of use.

The maximum net residential density in the Medium Density Residential Districts is 62 units per hectare (25 units per acre) and no building shall exceed four storeys in height at street elevation. The proposed development, at 47 units, would have a net residential density of 87 units per hectare (36 units per acre). Special development policies have been requested to recognize an increased net residential density for medium density residential development on the site.

Any further Medium Density Residential designations [beyond those currently in the Official Plan] will be consistent with the following location criteria:

- sites which abut arterial or collector roads or sites situated in a manner which prevents traffic movements from the site from flowing through any adjoining Low Density Residential Districts;
- sites which are close to community supportive facilities such as schools; shopping plazas, institutional, recreational and open space areas;
- sites which are adjacent to the Central Area, designated Shopping Centres and Service Commercial Areas, Community Facilities, High Density Residential Districts or developed Medium Density Residential Districts.

In addition to the requirement for compliance to the locational policies; when considering proposals to designate lands for medium density residential development, Town Council and County Council will be guided by the following:

- the size, configuration and topography of the site provides sufficient flexibility in site design to mitigate adverse effects on the amenities and character of any adjacent Low Density Residential area through adequate buffering and screening;
- the location of vehicular access points and the likely effects of traffic generated by the proposal on the public road system and surrounding properties relative to pedestrian and vehicular safety is acceptable;
- adequate hard service capacity including water distribution, sanitary and storm sewers, power and gas distribution facilities is available or will be available to accommodate the proposed development;
- adequate off-street parking and outdoor amenity areas can be provided;
- the availability of, and proximity to, existing or proposed services and amenities such as day care, schools, leisure facilities, shopping and parks to serve the new development;
- the effect of the proposed development on environmental resources or the effect of environmental constraints on the proposed development will be addressed and mitigated as outlined in Section 3.2.

The southern portion of the subject lands contains an area of locally significant woodland. Section 3.2 of the Official Plan requires that, where site alteration is occurring within or 50 m adjacent to Locally Significant Natural Heritage Features, an Environmental Impact Study be prepared.

New permitted uses, or expansions/enlargements to existing uses, buildings, or structures that require a Planning Act approval and are to be located within or adjacent to a natural heritage feature, may only be permitted if it can be demonstrated through an Environmental Impact Study (EIS), prepared to the satisfaction of the County and Area Municipality in accordance with the policies contained in Section 3.2 of the Plan, that there will be no negative impacts to the natural heritage features and/or their ecological functions.

[Town of Tillsonburg Zoning By-law](#)

The subject lands are currently zoned 'Minor Institutional Zone (IN1)'. The applicant is proposing to rezone a portion of the lands to 'Special Medium Density Residential Zone (RM-sp) to facilitate the proposed four storey, 47 units apartment building.

The proposed apartment building (as depicted in Attachment 3) appears to meet the standard RM zoning provisions with the exception of the lot area per dwelling unit which is proposed to be reduced from 160 m² (1,722 ft²) per dwelling unit to 114 m² (1,227 ft²) per dwelling unit.

It is noted that the applicant is proposing approximately 71 parking spaces including the required accessible parking spaces, which exceeds the required parking spaces for the proposed apartment building in accordance with the provision of Section 5.24 of the Zoning By-law.

[Agency Comments](#)

Tillsonburg Chief Building Official indicated that the proposed split zoning for the parcel will require a defined boundary and that the proposal will be subject to site plan control and approval.

Oxford County Public Works indicated no concerns with the proposal and provided comments on the Functional Servicing Brief which will be addressed at the time of site plan approval.

Tillsonburg Engineering Department indicated no objections to the proposal. Concerns and comments relating to the waste management collection, stormwater management and functional servicing report were provided and will be addressed at the time of site plan approval.

Town of Tillsonburg Manager of Engineering clarified that the TIS does not indicate a failure at the intersection of Simcoe Street and Cedar Street but that the intersection is operating at a Level of Service (LOS) F (which is based on scale of A to F). The LOS F at the northbound left-turn occurs at peak PM hours, however, it is noted by the TIS author that "the movement is well within the lane capacity, and the delay is typical" and "the proposed development can be accommodated by the existing study area road system, and no off-site road improvements will be required."

Canada Post indicated that a centralized lock box assembly is required where a common lobby, common indoor or sheltered space is provided. The installation and maintenance of the mailbox is the responsibility of the developer/owner.

Tillsonburg Hydro, Tillsonburg Fire Department indicated no objections to the applications.

Public Consultation

Letters of concern were received prior to Town Council's consideration of the applications at their meeting of October 14, 2025. A number of adjacent landowners attended the public meeting to outline their concerns. In summary, the concerns were relating to the following:

- Increased density utilizing local roads;
- Removal of park land, and play areas;
- Traffic and safety impacts from the development;
- Over-concentration of community-housing;
- Ensuring the units remain affordable;
- Cost of infrastructure upgrades.

At the October 14, 2025, Town Council meeting, concerns were raised regarding the findings of the Traffic Impact Study (TIS) and, specifically, the intersection of Simcoe Street and Cedar Street. The TIS concluded that the intersection of Simcoe and Cedar is currently operating at a Level of Service (LOS) F (LOS is graded on a scale of A to F). Additionally, concerns were raised regarding when a road is reconsidered from a local road to a collector. The TIS also concluded that the proposed development would not require off-site road improvements and there will be minimal impact on the neighbourhood road system.

As a result of the concerns presented, Town Council requested that the operating level of the intersection of Simcoe and Cedar be referred to the traffic consultant who is completing the updates to the Transportation Master Plan for the Town. Town Council deferred their consideration of the application to provide an opportunity for the traffic consultant to review the development and provide comments.

The consultant provided a response which is appended to this report as Attachment 4. The traffic consultant advised they had no concerns with the TIS for 31 Earle. A discussion of their findings is contained within the Planning Analysis section of this report.

Additionally, there was a delegation to Town Council at the November 10, 2025 meeting by an adjacent landowner. The delegation raised concerns respecting the density of the proposal, local traffic increase and pedestrian safety, loss of green space and environmental impacts, over concentration of community housing, and affordability concerns.

Town of Tillsonburg Council

Town of Tillsonburg Council recommended support of the proposed Official Plan Amendment and approved 'in principle' the proposed Zone Change Application at their November 10, 2025, meeting.

Planning Analysis

Applications have been received to amend the Official Plan to facilitate the construction of a four storey apartment building containing approximately 47 units. The applicant proposes to redesignate the central portion of the subject lands from 'Low Density Residential' and 'Environmental Protection' to 'Medium Density Residential' with special development policies to permit a higher net residential density than is currently permitted in the medium density residential designation.

Supporting Studies

An Environmental Impact Study, Traffic Impact Brief, Planning Justification Report and Functional Servicing Report have been submitted to support the subject applications.

Environmental Impact Study

The requirement for the Environmental Impact Study (EIS) was triggered by the presence of a Locally Significant Woodland adjacent to the proposed development. The EIS was peer reviewed and comments from the consultant were incorporated into the design and layout of the proposed development in order to avoid conflicts and impacts on the feature. In light of the foregoing, planning staff consider the proposed residential development to be consistent with the Official Plan policies respecting development adjacent to significant woodlands and natural heritage features.

Transportation Impact Brief

A Transportation Impact Brief was prepared by Paradigm Transportation Solutions Limited which assessed and analyzed the existing traffic conditions, and future traffic conditions with recommendations to accommodate the proposed development. The analysis indicated that the proposed development is forecast to generate 16 morning peak hour trips and 29 evening peak hour trips. Based on the findings and conclusions of the study, it is anticipated that the proposed development can be accommodated by the Town's existing street and road network, with the required additional demand being able to be accommodated by the existing streets and parking areas.

With respect to the concerns raised about Traffic Volumes, the traffic engineering consultant summarized that the left turn at the Simcoe/Cedar intersection is currently operating with a delay of 69 seconds per vehicle. The PM peak forecasted growth to 2032 will result in a delay of 110 seconds per vehicle. Additionally, the current volume making a left turn in the PM peak onto Simcoe Street is 18, whereas the 2032 forecasts 24 turns in the PM peak, resulting in a 6 vehicle increase. It is noted by the consultant that the increase is not due to the proposed development and is primarily due to an 11% growth in traffic on Simcoe Street.

The traffic consultant also commented on the need for improvements and noted that traffic signals can alleviate road delay, however, at this specific intersection, with 24 vehicles making a left turn at PM peak and a small amount of traffic from the commercial driveway on the north side of Simcoe, traffic signals are not warranted. It is noted that traffic signals are typically warranted where there are an average 120 vehicles per hour on a sideroad and 50 vehicles per hour turning

left. Additionally, the collision data from 2019 to 2023 noted one (1) collision at the Simcoe/Cedar intersection.

Further, the traffic consultant found that there is no need to widen Cedar Street as there are only 93 vehicles per hour (two way) and the planning capacity for a local road is approximately 1,000 vehicles per hour (two way). Widening Cedar Street is not required nor would it improve the side left turn delays on Simcoe Street which are a result of the existing and forecasted traffic volumes on Simcoe Street, not resulting from the proposed development. The consultant concluded that no off-site road improvements will be required as a result of the proposed development.

Functional Servicing Report

The Functional Servicing Report submitted by the applicant for the development has been reviewed by Town and County staff. Town and County staff are satisfied that the servicing of the lands utilizing existing municipal services are feasible and appropriate to serve the proposed development. The applicant will be required to submit detailed servicing drawings and any required further technical studies for review and final approval as part of the site plan approval process.

Provincial Planning Statement (PPS) 2024

Planning staff are of the opinion that the subject proposal is consistent with the applicable policies of the PPS, as the development is considered to be an efficient use of land and municipal services within a fully serviced settlement area. The proposal will increase the housing supply (particularly with respect to affordable and attainable housing units) to help address the full range of housing affordability needs and will assist the Town in providing and building homes that respond to changing market needs and local demand, to support a diverse and growing population and workforce in the Town and broader region. The development is also consistent with Sections 2.1.4, and 2.2.1 of the PPS, as it will permit and facilitate housing options required to meet the social, health, economic and well-being requirements for current and future residents, facilitate residential intensification, including the development and redevelopment of underutilized commercial and institutional sites for residential uses, and represents the development and introduction of new housing options within previously developed areas and redevelopment, which results in a net increase in residential units.

County of Oxford Official Plan

The Official Plan recognizes the importance of increasing the supply of affordable housing within Tillsonburg and states that Town Council may consider the use of reduced municipal infrastructure requirements and lot standards on a site-specific basis to facilitate the delivery of affordable housing, provided that the use of such measure continues to meet the overall objectives of the Plan.

With respect to the proposed Official Plan amendment to provide increased residential density on the site, it is the opinion of Planning staff that the Official Plan criteria respecting the designation of additional Medium Density Residential areas have been adequately addressed and are assessed below.

The area to be developed is of sufficient size to adequately accommodate the proposed medium density development. The area to be redesignated is approximately 0.54 ha (1.33 ac), with the woodlot to the south of the developed area to be maintained and remain designated as Environmental Protection and the front portion of the subject lands to remain designated as Low Density Residential. The subject lands are generally flat and bounded by public streets on all sides. The subject lands are in close proximity to existing residential development, Elliot Fairbairn Park, and are less than 200 m from designated shopping areas and service commercial uses and amenities on Simcoe Street. As such, Planning staff are satisfied that the proposed developable lands provide flexibility for site design, transitioning to surrounding existing low-density development, buffering supported by the presence of the woodlot adjacent to industrial uses south along Cedar Street, and provide adequate amenities in the surrounding area.

While the subject lands do not provide direct access to an arterial road, Simcoe Street, an arterial road on the Transportation Network Plan (Schedule T-4) is within 200 m of the subject lands. Planning staff also note that the subject lands were previously utilized as an elementary school which would have produced more vehicular trips on and off the subject site than the proposed apartment building. Official Plan policy 8.2.2.1 directs that Council may consider the use of reduced municipal infrastructure to facilitate the delivery of affordable housing. Planning staff are satisfied that access to a local road (Cedar street) is adequate for the development of the proposed apartment building in this case. As noted, the Traffic Impact Brief assessed the existing and proposed traffic conditions and no impact is anticipated on Simcoe Street or Cedar Street as a result of the proposed development, no off-site roadway improvements were recommended, the required off-street parking can be accommodated, and the location of the site access from Cedar Street is appropriate and will generate minimal traffic impact on the neighbourhood streets.

The proposed net residential density of the site is higher than what is contemplated by the Medium Density Residential designation. However, the proposed building height of 4 storeys and form of development (i.e. low-rise apartment) is consistent with the policies and form of residential development contemplated within this designation. The proposed apartment building will contain affordable housing units and, as such, the number of units has been increased in order to maximize the efficient use of the lands and accommodate the need for affordable housing units resulting in an overall net residential density of 87 units per hectare (36 units per acre) which does not include the woodlot area to the south of the development. The built form and density proposed will serve to protect the existing woodlot and maximize and utilize the developable area efficiently, while accommodating as many affordable units as possible.

The proposed building being a low rise (4 storey) apartment is considered a Medium Density form of development based on its appearance and building typology. The overall net residential density exceeds what is typically permitted, however, Planning staff are satisfied that the proposed exceedance of the maximum net residential density for the Medium Density Residential designation is appropriate in this case, as the proposed building type is a medium density built form and the development and increased unit count will contribute towards the County's goal of a minimum target of 20% of housing being affordable. Additionally, the proposed development will achieve a priority project and strategic direction outlined in the Town of Tillsonburg Community Strategic Plan for an Affordable housing collaboration with Oxford County.

Based on the EIS that was submitted in support of the application, it is the opinion of planning staff that the proposed residential development is consistent with the Official Plan policies respecting development adjacent to significant woodlands and natural heritage features and

would result in no negative impacts to the adjacent woodlot. A small portion along the north side of the woodlot that is currently designated as Environmental Protection is proposed to be re-designated as Medium Density Residential as reflected on Schedule T-2 of Attachment 6 (Official Plan Amendment, OPA 347). However, this amendment is technical in nature, as these lands do not contain any trees or natural features. As noted in the EIS, the development itself will have no negative impacts on the wooded area.

The Functional Servicing Report provided by the applicant was reviewed by Town and County staff and no concerns were raised with respect to servicing capacity. The proposed development will utilize existing municipal infrastructure and not require extensions or significant upgrades to service the proposed development. The development will be subject to site plan approval, where matters related to detailed servicing, landscaping, fencing, buffering, grading, access and parking will be required to be addressed to the satisfaction of the Town and County.

CONCLUSIONS

In light of the foregoing Planning staff are satisfied that the Official Plan amendment application is consistent with the policies of the Provincial Planning Statement and is in-keeping with the strategic initiatives and objectives contained in the Official Plan. As such, staff are recommending approval of the Official Plan amendment application.

SIGNATURES

Report author:

Original Signed By

Amy Hartley
Development Planner

Departmental Approval:

Original Signed By

Eric Gilbert, MCIP, RPP
Manager of Development Planning

Original Signed By

Paul Michiels
Director of Community Planning

Approved for submission:

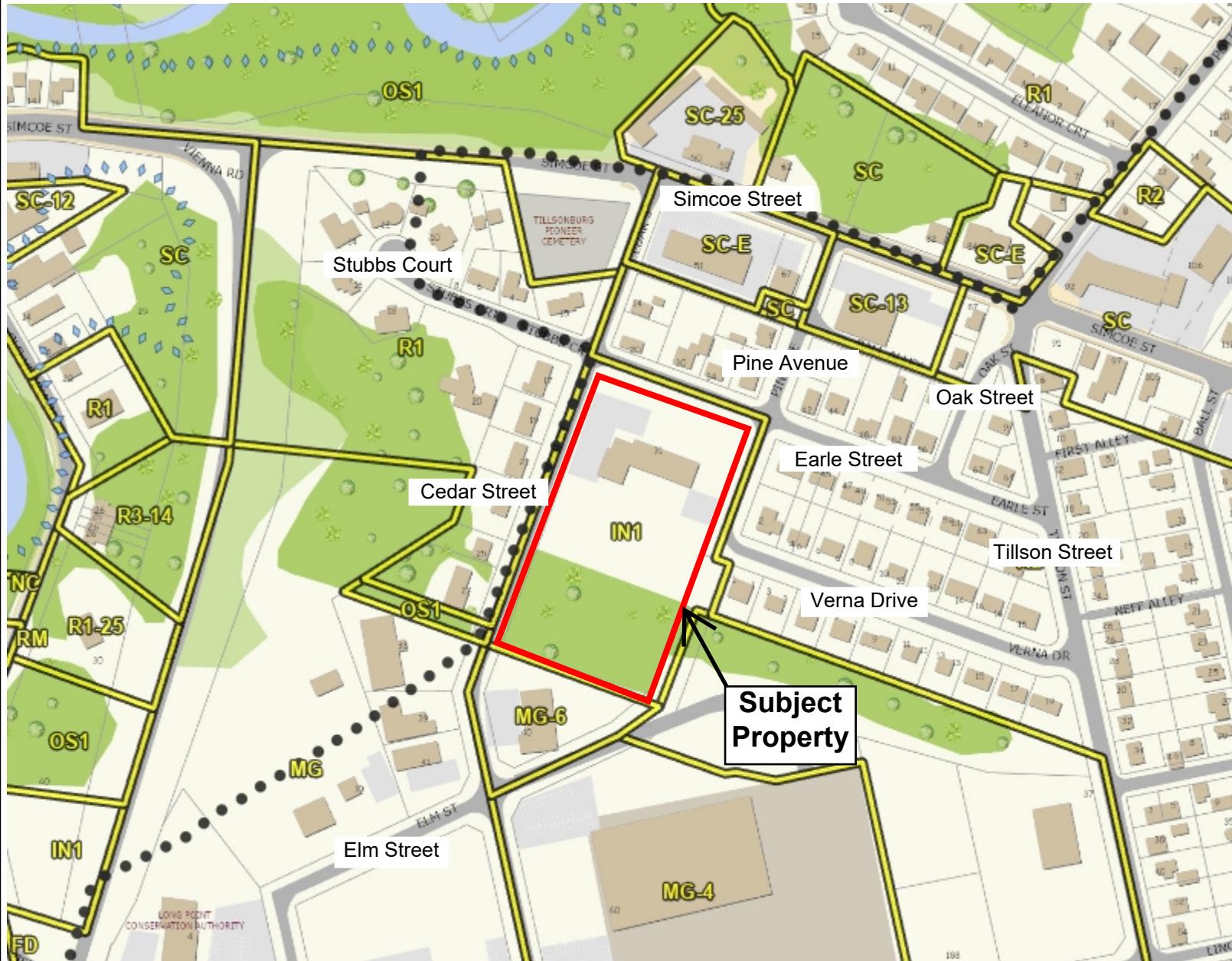
Original Signed By

Benjamin R. Addley
Chief Administrative Officer

ATTACHMENTS

Attachment 1 – Plate 1, Location Map with Existing Zoning
Attachment 2 – Plate 2, 2020 Aerial Map
Attachment 3 – Plate 3, Proposed Concept Plan
Attachment 4 – Plate 4, Comments from Traffic Engineer
Attachment 5 – Public Comments
Attachment 6 – Official Plan Amendment, OPA 347

Plate 1: Location Map with Existing Zoning
 File Nos.: OP 24-02-7 and ZN 7-24-01 (Town of Tillsonburg)
 Lots 25-26, Plan 966; 31 Earle Street, Town of Tillsonburg



Legend

Zoning Floodlines Regulation Limit

- 100 Year Flood Line
- 30 Metre Setback
- Conservation Authority Regulation Limit
- Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

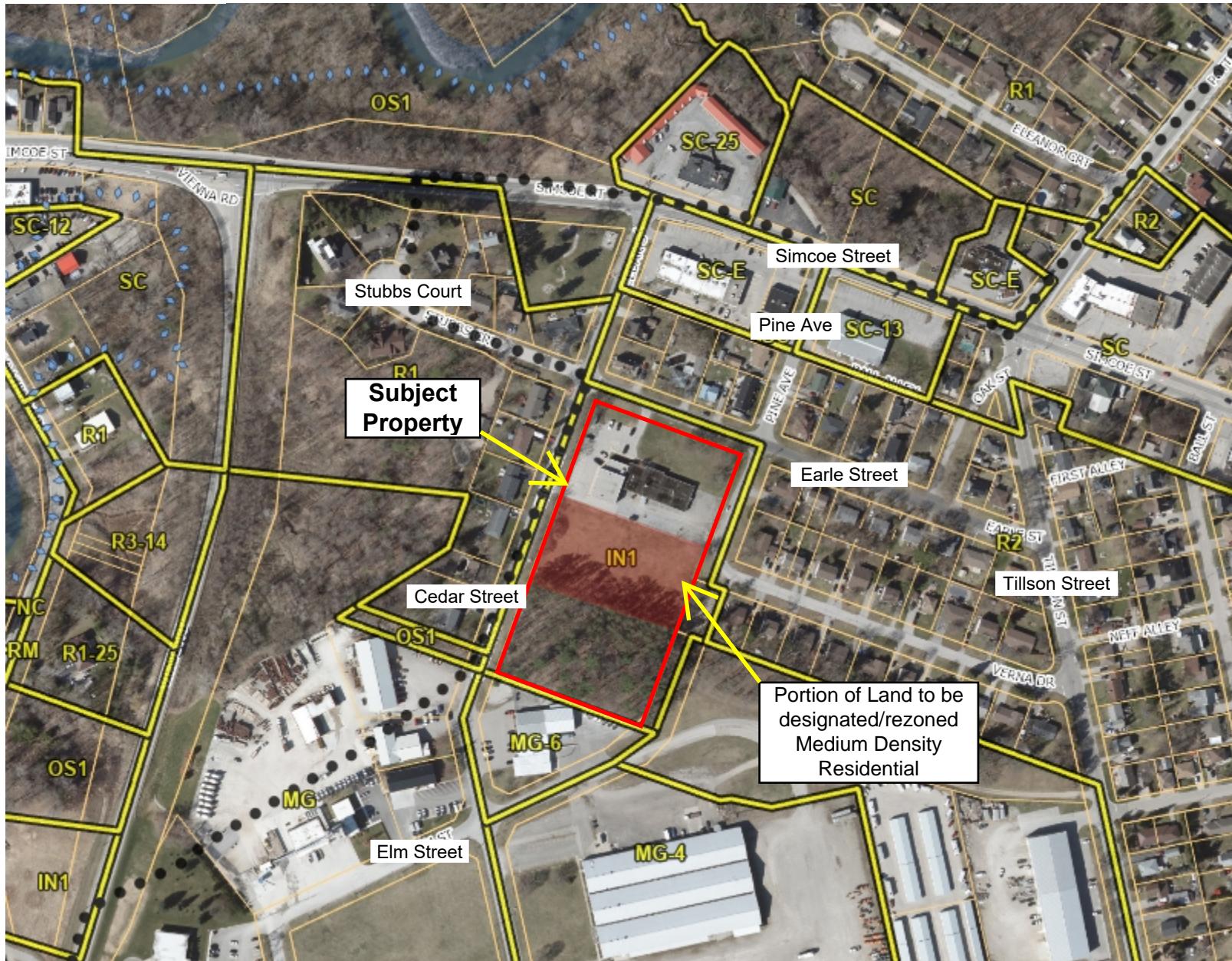
Notes



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March 22, 2024

Plate 2: 2020 Aerial Map
File Nos.: OP 24-02-7 and ZN 7-24-01 (Town of Tillsonburg)
Lots 25-26, Plan 966; 31 Earle Street, Town of Tillsonburg



Legend

- Zoning Floodlines Regulation Limit
- 100 Year Flood Line
- 30 Metre Setback
- Conservation Authority Regulation Limit
- Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



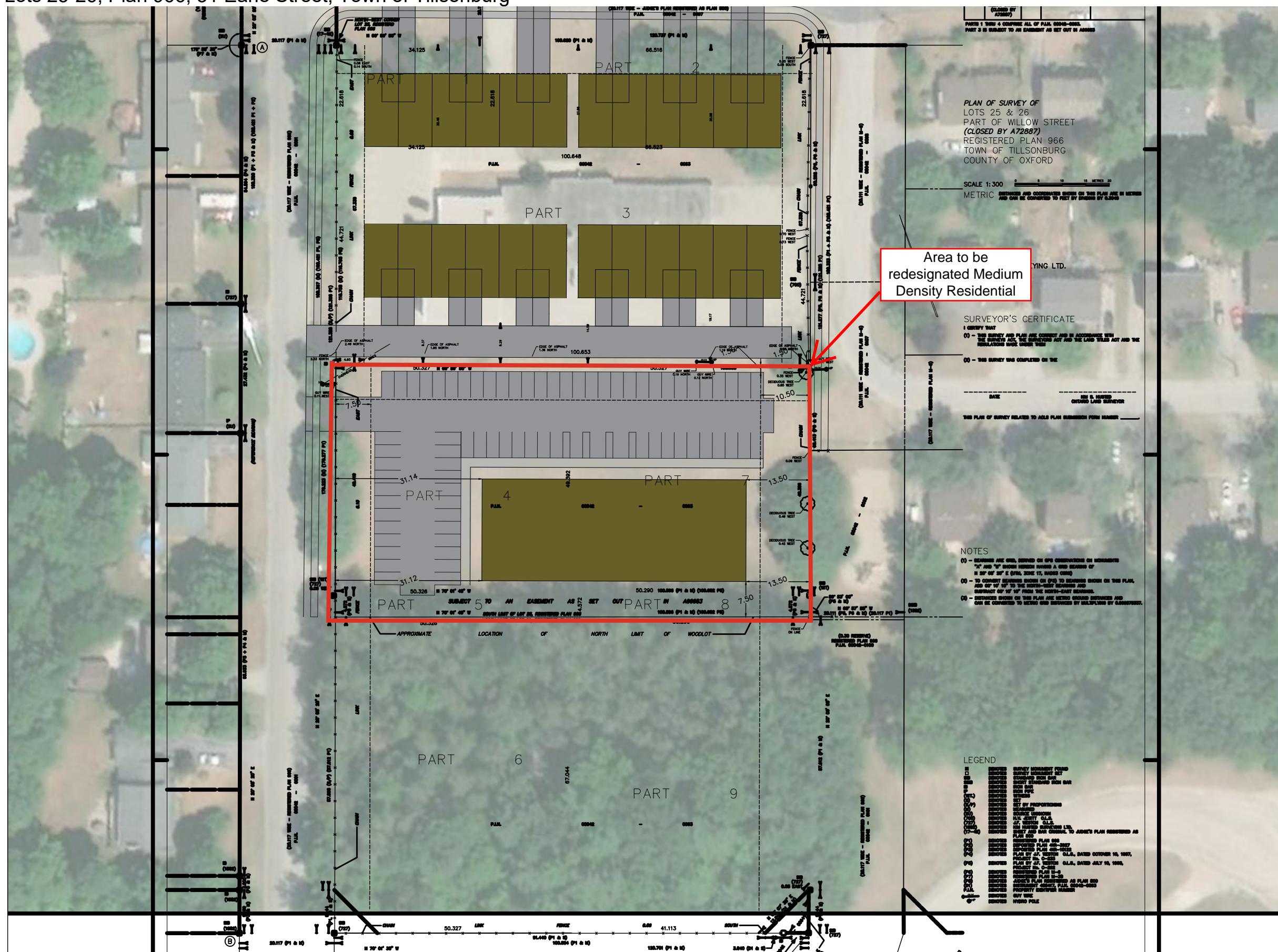
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Plate 3: Proposed Concept Plan

File Nos.: OP 24-02-7 and ZN 7-24-01 (Town of Tillsonburg)

Lots 25-26, Plan 966; 31 Earle Street, Town of Tillsonburg



Amy Hartley

From: Leo Ferreira <lferreira@tillsonburg.ca>
Sent: Wednesday, October 29, 2025 12:51 PM
To: Amy Hartley; Carlos Reyes
Subject: Fw: Council Decision Letter - October 14, 2025 - Official Plan Amendment Application and Zone Change Application - OP 24-02-7 and ZN 7-24-01 - 31 Earle Street (Town of Tillsonburg)

Hi Amy,

Please see below for your follow up to Council.

Leo Ferreira, P. Eng., PMP

Manager of Engineering
Town of Tillsonburg
10 Lisgar Ave,
Tillsonburg, ON N4G 5A5
Phone: 519-688-3009 Ext. 4410

www.Tillsonburg.ca

www.DiscoverTillsonburg.ca

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From: Kevin Jones <kjones@ptsl.com>
Sent: Wednesday, October 29, 2025 12:46:38 PM
To: Leo Ferreira <lferreira@tillsonburg.ca>
Subject: RE: Council Decision Letter - October 14, 2025 - Official Plan Amendment Application and Zone Change Application - OP 24-02-7 and ZN 7-24-01 - 31 Earle Street (Town of Tillsonburg)

Hi Leo

Based on a review of the TIS I don't think this is anything to be concerned about.

In the PM Peak the key intersection of Cedar / Simcoe St currently operates at LOS F for the left turn move today with a delay of 69 seconds per veh.

With the development plus background growth to 2032 the PM Peak is forecast to still operate at LOS F with a delay of 110 second per vehicle. An increase in delay of 40 seconds per vehicle.

The forecast volume making the left turn is 24 in the PM Peak at full build out in 2032 – compared to 18 today. An extra 6 vehicles will be generated in the future and there will be an extra 40 seconds delay on average to find a gap to make the left turn. This increase is not due to the development traffic and is primarily due to about 11% growth in traffic on Simcoe Street over the same period – based on back growth.

The most common improvement to avoid the additional side road delay would be traffic signals, however with only 24 vehicles per hour making the left and very few vehicles using the Commercial driveway on the opposite side this location would not meet the minimum volume requirement for traffic signals. Typically, you would need an average of 120 vehicles per hour on the side road averaged over 8 hours of the day plus an average of 50 vehicles per hour turning left from the sideroad intersection (each of the same 8 hours) to meet the minimum requirements for signals. I also checked our collision data and found only 1 collision at this intersection between 2019 and 2023.

There would be no need to widen Cedar Street in the future as there are only 93 vehicles per hour (two way) using Cedar Street at the intersection. Typical planning capacity for a local road like this would be in the neighbourhood of 1000 vehicles per hour (two way). There is already a northbound left turn lane in place. Even if you were to widen the road it would not improve the side road delay at the intersection. The report noted the volume to capacity ratio for the northbound left will be 0.43 after build out. Typically, you would only consider adding capacity if this was well over 0.85.

Hope this helps.

Kevin Jones

Senior Consultant, Associate
Public Sector Practice Lead

Paradigm Transportation Solutions Limited

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Office Hours: 07:30 – 17:30 M-T, closed Fridays



From: Leo Ferreira <lferreira@tillsonburg.ca>
Sent: October 27, 2025 11:40 AM
To: Kevin Jones <kjones@ptsl.com>
Subject: FW: Council Decision Letter - October 14, 2025 - Official Plan Amendment Application and Zone Change Application - OP 24-02-7 and ZN 7-24-01 - 31 Earle Street (Town of Tillsonburg)

Hi Kevin,

Bringing to top in case got buried

Leo Ferreira, P. Eng., PMP

Manager of Engineering
Town of Tillsonburg
10 Lisgar Ave,
Tillsonburg, ON N4G 5A5
Phone: 519-688-3009 Ext. 4410

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Please consider the environment before printing this email.

From: Leo Ferreira

Sent: October 16, 2025 2:47 PM

To: Kevin Jones <kjones@ptsl.com>

Cc: Carlos Reyes <CReyes@tillsonburg.ca>

Subject: FW: Council Decision Letter - October 14, 2025 - Official Plan Amendment Application and Zone Change Application - OP 24-02-7 and ZN 7-24-01 - 31 Earle Street (Town of Tillsonburg)

Hi Kevin,

Please see below and attached referenced report.

Paradigm found that the left turn movement is operating at a Level of Service F during PM peak hour however they note that “the movement is well within the lane capacity, and the delay is typical” AND “the proposed development can be accommodated by the existing study area road system, and no off-site road improvements will be required”

May you comment on whether you’ve found concerns at Cedar/Simcoe that require attention? Public perception is that improvements are already needed; we will need to add a specific statement on “the need to widen Cedar Street” to the TMP

Leo Ferreira, P. Eng., PMP

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From: Laura Pickersgill <LPickersgill@tillsonburg.ca>

Sent: October 16, 2025 2:14 PM

To: Planning <planning@oxfordcounty.ca>; Carlos Reyes <CReyes@tillsonburg.ca>; Cephas Panschow <CPanschow@tillsonburg.ca>; Duncan Bryce <dbryce@tillsonburg.ca>; Amy Hartley <ahartley@oxfordcounty.ca>; Eric Gilbert <egilbert@oxfordcounty.ca>; Geno Vanhaelewyn <GVanhaelewyn@tillsonburg.ca>; Josh McFadden <jmcfadden@tillsonburg.ca>; Justin White <jwhite@tillsonburg.ca>; Trisha Voth <tvoth@tillsonburg.ca>; Leo Ferreira <lferreira@tillsonburg.ca>

Cc: Kyle Pratt <kpratt@tillsonburg.ca>; Amelia Jaggard <AJaggard@tillsonburg.ca>; Laura Pickersgill <LPickersgill@tillsonburg.ca>

Subject: Council Decision Letter - October 14, 2025 - Official Plan Amendment Application and Zone Change Application - OP 24-02-7 and ZN 7-24-01 - 31 Earle Street (Town of Tillsonburg)

Hello,

At the October 14, 2025, meeting of Tillsonburg Town Council, the following resolution was passed:

Resolution # 2025-359

Moved By: Councillor Parsons

Seconded By: Councillor Luciani

THAT Council defer Official Plan Amendment Application and Zone Change Application - OP 24-02-7 and ZN 7-24-01 until such time as Council has an opportunity to evaluate the need to widen Cedar Street; and

THAT Council request Planning staff to report back with further comments in regard to the concerns raised; and

THAT the intersection of Simcoe and Cedar Streets be referred to the consultant leading the Transportation Master Plan review.

Thanks,

Laura Pickersgill, AMP, Dipl.M.A

Acting Deputy Clerk
Town of Tillsonburg
10 Lisgar Ave
Tillsonburg, ON N4G 5A5
Phone: 519-688-3009 Ext. 4042

Ranked one of “Canada’s Top 25 Communities to Live and Work Remotely” (*Maclean’s 2021 Best Communities*)

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Opposition to OP24-02-7 & ZN 7-24-01 – 31 Earle Street

Lori Van Opstal
Tillsonburg, ON N4G 4P5
October 9, 2025

Mayor and Members of Council
Town of Tillsonburg
200 Broadway, Suite 204
Tillsonburg, ON N4G 5A7

Dear Mayor and Members of Council,

I am writing to oppose OP24-02-7 and ZN 7-24-01 for a proposed 47-unit, four-storey apartment at 31 Earle Street, and to request that Council instead pursue a community-compatible plan that protects and enlarges the existing park and woodlot while ensuring long-term Town ownership and ecological stewardship.

1) Density and location remain non-conforming

The proposal seeks a density of roughly 87 units per hectare, well above the Official Plan's Medium Density range (31–62 u/ha). It also relies entirely on local roads (Earle, Cedar, Pine) instead of the collector or arterial roads required for medium or high-density development (Official Plan Section 8.2.5). Approving this project would represent an exception that undermines the intent and consistency of the Official Plan.

2) Opportunity to enlarge the active park area

The Town's Official Plan (Leisure Resources policies, Schedule T-3) calls for the provision and equitable distribution of open space and the linkage of parks through trails and natural features. This site offers a unique opportunity to expand the active park area, connecting the existing play area to the adjacent woodlot and trail network. Approving a mid-rise apartment here would permanently remove the last viable chance to create a cohesive park system in this part of Tillsonburg.

3) Keep the play area and woodlot in Town ownership and rezone for protection

To ensure these green spaces remain accessible, maintained, and protected:

- Retain full Town ownership of both the existing play area and the wooded area.
- Rezone the play area to OS2 (Active Open Space) and the woodlot to OS1 (Passive Open Space) to formally recognize their recreation and environmental protection functions.
- These changes will ensure long-term municipal care, consistent maintenance standards, and protection against private redevelopment or institutional conversion.

4) Implement the EIS and peer-review recommendations for the woodland

The peer reviewer (North-South Environmental) noted that the EIS found limited understory and woody regeneration caused by mowing by Town staff, and that the woodland would meet density requirements if mowing stopped. It is concerning that mowing has occurred in an area designated Environmental Protection (Official Plan Section 3.2). Council should ensure that the EIS and peer review recommendations are fully implemented:

- Cease mowing and allow natural regeneration;
- Protect the woodland as a designated OS1 area under Town ownership;
- Manage the feature as part of the Town's ecological network, ensuring compliance with the Official Plan's Environmental Protection policies.

5) Traffic and safety deficiencies

The Traffic Impact Study underestimates traffic volumes and fails to consider cumulative development growth, contrary to Official Plan Section 8.2.5. It assumes unrealistically low trip rates for 47 units and overlooks the fact that the Cedar Street and Simcoe Street intersection already operates at LOS F (failing). The report also provides no pedestrian or school-route safety analysis, despite this being a family-oriented area adjacent to playgrounds. The site also connects only to local roads, inconsistent with the Plan's requirement that medium and high-density uses access collector or arterial streets (Section 8.2.5). Council should defer approval until the traffic study is revised to comply with these requirements.

6) Avoid over-concentration of community housing

Oxford County already operates Rent-Geared-to-Income family housing on Earle Street (47-61) and Verna Drive (1A-16A, 1B-16B), as well as other RGI sites at Maple Lane and Queen Street. Adding another large apartment in this same neighbourhood would concentrate community housing in one node instead of distributing affordable options evenly across Tillsonburg, contrary to the Official Plan's objective of balanced, inclusive neighbourhoods.

7) Affordability claims lack guarantees

The Planning Justification Report cites "affordable housing," yet there are no binding affordability agreements (e.g., with Oxford County or CMHC). Without secured affordability, the proposal cannot justify policy overrides.

Constructive alternative requested

Please reject the current amendments and invite a revised concept that:

- Delivers affordable, ground-oriented townhomes within 31–35 u/ha;
- Expands the park and integrates it into the existing wooded area/trail;
- Uses one consolidated access on Earle with a pedestrian-first layout; and
- Partners with County/non-profit providers to secure a share of units as affordable without over-concentrating RGI at one node.

This path meets intensification goals and the Official Plan's density, location, and compatibility policies while improving parkland and neighbourhood fit.

Respectfully submitted,

Lori Van Opstal Resident - [REDACTED] Tillsonburg, ON N4G 4P5

[REDACTED]

31 Earle Street – Balanced Growth, Park Expansion & Community Protection

Key Points

- Proposed 47-unit apartment exceeds Medium Density (87 u/ha vs. 31–62) and uses only local roads.
- Traffic Impact Study underestimated trips, ignored area growth, and found LOS F at Cedar/Simcoe without proposing mitigation.
- Site offers only chance to expand the park and link it to the woodlot/trail network.
- Rezone play area OS2 (Active Open Space) and woodlot OS1 (Passive Open Space) under Town ownership.
- Implement EIS and peer review recommendations: stop mowing and allow woodland regeneration.
- Oxford County already provides RGI housing nearby; this proposal over-concentrates community housing.
- PJR's 'affordable' claim lacks binding agreements with Oxford County or CMHC.

Constructive Alternative

Reject OP24-02-7 / ZN 7-24-01 and invite a plan that:

- Provides affordable townhomes (31–35 u/ha)
- Expands and integrates the park and woodlot
- Improves traffic safety with one consolidated access
- Partners with County/non-profit to secure true affordability

Requested Actions

1. Deny the current OPA and ZBA applications.
2. Require an updated traffic study that complies with Official Plan Section 8.2.5.
3. Zone play area OS2 and woodlot OS1 under Town ownership.
4. Implement EIS woodland restoration recommendations.
5. Invite a revised, park-led townhouse proposal with secured affordability.

Prepared by: Lori Van Opstal, Tillsonburg Resident

COUNTY OF OXFORD
BY-LAW NO. **6798-2026**

BEING a By-Law to adopt Amendment Number 347 to the County of Oxford Official Plan.

WHEREAS, Amendment Number 347 to the County of Oxford Official Plan has been recommended by resolution of the Council of the Town of Tillsonburg and the County of Oxford has held a public meeting and has recommended the Amendment for adoption.

NOW THEREFORE, the County of Oxford pursuant to the provision of the Planning Act, R.S.O. 1990, as amended, enacts as follows:

1. That Amendment Number 347 to the County of Oxford Official Plan, being the attached explanatory text, is hereby adopted.
2. This By-Law shall come into force and take effect on the day of the final passing thereof.

READ a first and second time this 28th day of January, 2026.

READ a third time and finally passed this 28th day of January, 2026.

MARCUS RYAN, WARDEN

LINDSEY MANSBRIDGE, CLERK

AMENDMENT NUMBER 347
TO THE COUNTY OF OXFORD OFFICIAL PLAN

the following text and Plan designated Schedule "A", attached hereto, constitute
Amendment Number 347 to the County of Oxford Official Plan.

1.0 PURPOSE OF THE AMENDMENT

The purpose of the Amendment is to re-designate certain lands in the Town of Tillsonburg from 'Low Density Residential' and 'Environmental Protection' to 'Medium Density Residential' with special development policies, to facilitate the development of a four storey, 47 unit apartment development.

2.0 LOCATION OF LANDS AFFECTED

This Amendment applies to lands located at Lots 25 & 26, and Part of Willow Street, Plan 966 in the Town of Tillsonburg. The lands front on the south side of Earle Street, east side of Cedar Street, and west side of Pine Avenue, and are municipally known as 31 Earle Street, Town of Tillsonburg.

3.0 BASIS FOR THE AMENDMENT

The amendment has been initiated to redesignate a portion approximately 0.54 ha (1.33 ac), of the subject lands from 'Low Density Residential' and 'Environmental Protection' to 'Medium Density Residential' with special development policies to facilitate the development of the lands as indicated in the 'Purpose of Amendment' section above.

Additionally, the amendment will remove the underlying designation of 'Public Elementary School' from Schedule T-3 of the Official Plan to recognize the use of the lands for residential purposes.

It is the opinion of Council that the amendment is consistent with the policies of the PPS as the development is an efficient use of land and municipal services within a fully serviced settlement area. The development also contributes to housing types and densities required to meet the projected requirements of current and future residents of the Town and the broader regional market area. Further, the proposed development supports the strategic initiatives and objectives of the Official Plan with respect to ensuring that adequate affordable housing for low and moderate income households is available in the Town of Tillsonburg.

Council is further satisfied that the Official Plan criteria respecting the designation of the lands for Medium Density Residential purposes have been satisfactorily addressed.

The Official Plan recognizes the importance of increasing the supply of affordable housing within Tillsonburg and directs that the Town Council may consider the use of reduced municipal infrastructure requirements and lot standards on a site-specific basis to facilitate the delivery of affordable housing provided that the use of such measure continues to meet the overall objectives of the Plan.

While the subject lands do not provide direct access to an arterial road, Simcoe Street, an arterial road on the Transportation Network Plan (Schedule T-4), is

within 200 m of the subject lands. The subject lands are in close proximity to Elliot Fairbairn Park, Coronation Park, Annadale Public School, and are less than 300 m from designated shopping areas on Simcoe Street. Adequate servicing capacity exists to serve the proposed development, and the development will be subject to the site plan approval process, where matters related to servicing, landscaping, fencing, grading, access and parking will be addressed to the satisfaction of the Town and County.

The proposed net residential density of the site is higher than what is contemplated by the Medium Density Residential designation, however, the proposed building height is within the range permitted, further the typology of a low-rise apartment is an appropriate type of development within this designation and that the presence for affordable housing units contributes to the County's target goal for affordable housing.

In light of the foregoing, it is the opinion of Council that the proposed Official Plan Amendment is consistent with the policies of the PPS and supports the objectives and strategic initiatives of the Official Plan.

4.0 DETAILS OF THE AMENDMENT

4.1 That Section 8.2.5 – *Medium Density Residential Areas*, as amended, is hereby further amended by adding the following specific development policy at the end of Section 8.2.5.2 – *Special Development Policies*:

“8.2.5.2.3 South side of Earle Street, between Cedar Street and Pine Avenue, Town of Tillsonburg (31 Earle Street).

Location Lots 25 & 26, and Part of Willow Street, Plan 966 in the Town of Tillsonburg, south side of Earle Street, east side of Cedar Street and west side of Pine Avenue, Town of Tillsonburg.

Policies Notwithstanding Section 8.2.5, *Medium Density Residential*, or any other relevant policies of the Official Plan to the contrary, the net residential density in the Medium Density Residential area shall not exceed 87 units per hectare (36 units per acre) and the minimum net residential density shall be 31 units per hectare (13 units per acre). ”

4.2 That Schedule “T-2” – Town of Tillsonburg Residential Density Plan, is hereby amended by changing the land use designation of those lands identified as “ITEM 1” on Schedule “A” attached hereto from “Low Density Residential” to “Medium Density Residential”.

4.3 That Schedule “T-2” – Town of Tillsonburg Residential Density Plan, is hereby amended by changing the land use designation of those lands identified as “ITEM 2” on Schedule “A” attached hereto from “Environmental Protection” to “Medium Density Residential”.

4.4 That Schedule “T-3” – Town of Tillsonburg Leisure Resources and School Facilities Plan, is hereby amended by removing the designation of ‘Public Elementary School’ of those lands identified as “ITEM 1” on Schedule “A”.

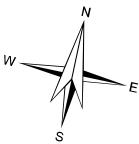
5.0 **IMPLEMENTATION**

This Official Plan Amendment shall be implemented in accordance with the implementation policy of the Official Plan.

6.0 **INTERPRETATION**

This Official Plan Amendment shall be interpreted in accordance with the interpretation policy of the Official Plan.

SCHEDULE "A"
AMENDMENT No. 347
 TO THE
**COUNTY OF OXFORD
 OFFICIAL PLAN**
 SCHEDULE "T-2"
**TOWN OF TILLSONBURG
 RESIDENTIAL DENSITY PLAN**



Metres
 0 100 200



- AREA OF THIS AMENDMENT

ITEM 1 - CHANGE FROM LOW DENSITY RESIDENTIAL
 TO MEDIUM DENSITY RESIDENTIAL

ITEM 2 - CHANGE FROM ENVIRONMENTAL PROTECTION
 TO MEDIUM DENSITY RESIDENTIAL

**RESIDENTIAL DENSITY PLAN
 LEGEND**

	LOW DENSITY RESIDENTIAL
	OPEN SPACE
	ENVIRONMENTAL PROTECTION
	PROPOSED PARK

SCHEDULE "A"

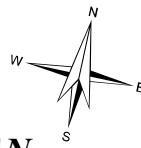
AMENDMENT No. 347

TO THE

**COUNTY OF OXFORD
OFFICIAL PLAN**

SCHEDULE "T-3"
TOWN OF TILLSONBURG

LEISURE RESOURCES AND SCHOOL FACILITIES PLAN

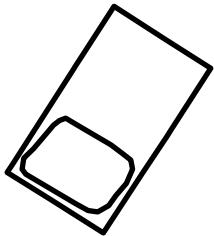


Metres
0 100 200



- AREA OF THIS AMENDMENT

ITEM 1 - REMOVE FROM PUBLIC ELEMENTARY SCHOOL



**LEISURE RESOURCES AND SCHOOL FACILITIES PLAN
LEGEND**

- OPEN SPACE
- ENVIRONMENTAL PROTECTION
- PUBLIC ELEMENTARY SCHOOL
- FLOODLINE