

Staff Report



Development Services Department

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REPORT TO: Planning and Strategic Initiatives Committee

DATE OF MEETING: October 27, 2025

SUBMITTED BY: Garett Stevenson, Director of Development and Housing Approvals,
519-783-8922

PREPARED BY: Andrew Pinnell, Senior Planner, 519-783-8915

WARD INVOLVED: Ward 5

DATE OF REPORT: October 16, 2025

REPORT NO.: DSD-2025-400

SUBJECT: Draft Plan of Subdivision Application 30T-23201
1700 Strasburg Road and McBrine Drive
2140221 Ontario Inc.

RECOMMENDATIONS:

That the City of Kitchener, pursuant to Section 51 (31) of the Planning Act R.S.O. 1990, Chapter P 13 as amended, grant draft approval to Plan of Subdivision Application 30T-23201 in the City of Kitchener, for 2140221 Ontario Inc., subject to the draft plan and draft plan conditions attached to Report DSD-2025-400 as Attachment 'A'; and,

That the Mayor and Clerk be authorized to approve and execute an industrial Subdivision Agreement securing the Draft Plan of Subdivision conditions set out in Report DSD-2025-400, to the satisfaction of the City Solicitor, and that the City Solicitor be directed to register said agreement on title to the Subject Lands identified in Attachment 'A' to report DSD-2025-400; and further,

That the *Updated Urban Design Brief Strasburg Technology Business Park*, prepared by GSP Group, dated May 2025, amended September 2025, attached as Attachment 'B' to report DSD-2025-400, be endorsed, and that staff be directed to implement this *Brief* through subdivision conditions and through future Site Plan Applications for individual lots at the discretion of the City's Director of Development and Housing Approvals with significant changes to this *Brief* to the satisfaction of Council.

REPORT HIGHLIGHTS:

- The purpose of this report is to evaluate and provide a planning recommendation regarding a Draft Plan of Subdivision Application to develop the subject lands into a business park subdivision containing 10 industrial lots, ranging in size from 0.67 to 1.22 hectares. McBrine Drive would be extended to connect with a new street ('Street

A'). 'Street A' would outlet to Strasburg Road. McBrine Drive would terminate at a new cul-de-sac bulb. Another cul-de-sac, 'Street B', is proposed off 'Street A'. A 4.00 hectare (9.9 acre) block is proposed for the purposes of a created wetland (not a stormwater management pond) as an expansion to the abutting Huron Natural Area (HNA) and as a setback / buffer to protected natural features. Another block is proposed as a 30-metre-wide wildlife corridor to facilitate wildlife passage from the HNA to a nearby wetland / pond to the northeast. Official Plan and Zoning By-law Amendment applications are not required to facilitate the proposed subdivision. The subdivision is for the technical division of land only (e.g., to create conveyable lots and streets); the land use permissions that permit industrial / employment uses have been in place since 1983.

- Development and Housing Approvals staff recommends approval of the application, subject to the draft approval conditions outlined in this report (see Attachment 'A'). Staff also recommends that the associated Urban Design Brief be endorsed and be implemented through subdivision conditions and future Site Plan Applications (see Attachment 'B'). The development proposal represents good planning and will allow for industrial development, while protecting and expanding the abutting Huron Natural Area.
- Community engagement included:
 - A preliminary postcard notice was mailed to all residents and property owners within 240 metres of the subject property (February 2023);
 - A Virtual Neighbourhood Meeting was held on September 4, 2025, the invitation for which was mailed in July 2025 to all residents and property owners within 240 metres of the subject property and all those who responded to the preliminary notice;
 - Installation of two notice signs on the property;
 - Follow-up communication with respondents;
 - A Postcard advising of the statutory public meeting would normally be forwarded to all residents and property owners within 240 metres of the subject property and those who responded to the preliminary notice, however due to the Canada Post Strike this was unable to be done. Instead, an email notice was provided on October 10, 2025 to everyone who provided written comments.
 - Notice of the public meeting was published in The Record on October 3, 2025.
- This report supports the delivery of core services.
- The application was deemed complete on February 5, 2023. The Applicant could appeal this application for non-decision after June 6, 2023.

EXECUTIVE SUMMARY:

The applicant is proposing a Plan of Subdivision to develop the subject lands into a business park subdivision containing 10 industrial lots, ranging in size from 0.67 to 1.22 hectares. Moreover, the abutting Huron Natural Area (HNA) would be expanded through the conveyance to the City of a 4.00 ha (9.9 ac) created wetland and buffer block. A wildlife corridor block would also be conveyed to the City to facilitate wildlife passage from the HNA to a nearby wetland / pond. A City-owned Boulevard Multi-Use Trail (BMUT) is proposed to allow access from Strasburg Road, through the subdivision, to the east entrance of Huron Natural Area. Additional BMUTs and sidewalks are proposed to provide further pedestrian opportunities. Official Plan and Zoning By-law Amendment applications are not required to facilitate the proposed subdivision. The subdivision is for the technical

division of land only (e.g., to create conveyable lots and streets); the land use permissions that permit industrial / employment uses have been in place since 1983. Also, the subject lands do not currently form part of the HNA, nor are they currently part of the related environmental features.

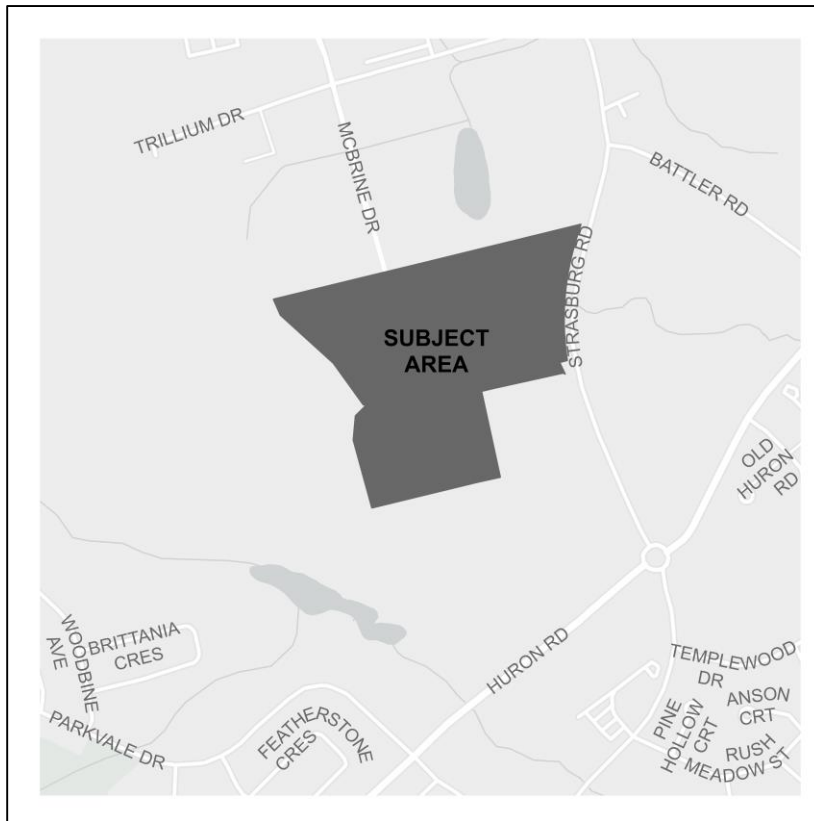


Figure 1 – Map showing the Subject Property

BACKGROUND:

The subject property is owned by 2140221 Ontario Inc. and is located within the Huron Park Planning Community. The property is composed of 2 abutting, irregularly-shaped lots:

1. Northern Lot: One lot is addressed as 1700 Strasburg Road, and is located south of the current terminus of McBrine Drive, with approx. 250 metres of frontage on Strasburg Road (10.58 ha / 26.14 acres); and
2. Southern Lot: The other lot is unaddressed and located to the south, of 1700 Strasburg Road, with a small frontage on Strasburg Road and opening up to the rear, behind Treehouse Foods (4.66 ha / 11.51 acres).

Altogether, the subject property is 15.25 ha (37.7 acres) in area. The subject property is vacant, being devoid of buildings and structures.

The subject property borders on Huron Natural Area (HNA) to the west, Strasburg Road to the east, lots used for industrial purposes and a large stormwater management pond (Strasburg Creek North Branch) to the north. Treehouse Foods is located to the south and east of the subject property. Activa Holdings owns the lands to the west and southwest, which are zoned 'Natural Conservation Zone (NHC-1)' as are all the lands that comprise

the HNA, which prohibits development. Huron Heights Secondary School and the Strasburg Stormwater Management Pond are located on the opposite side of Strasburg Road.

Significantly, both parcels have been zoned "Business Park" since 1983 (Zoning Bylaw 4830) and are currently zoned "Service Business Park Employment" in Kitchener's (2019-051) Zoning Bylaw.

All of the adjacent HNA is now protectively zoned 'NHC-1'. Previous to the City's property-by-property acquisition of the HNA commencing in the early 1990s, what is now known as the HNA, was largely privately owned and blanket zoned for Business Park development under the 1983 Zoning By-law 4830. A City-initiated study was commissioned and undertaken during the early 1990s to guide the City's acquisition of the significant and sensitive features of what has become the HNA. Through this study, the subdivision lands under review now were determined to *not* be lands that needed to be acquired by the City to protect the area's natural features.

Development in the form of area grading commenced on the subject properties in the late 1980s. That development was abandoned, leaving irregular topography and depressions which created ponding water. Since that time, due to abandonment, anthropogenic ("human-made") wetlands have formed and vegetation has grown on the Northern Lot, while the Southern Lot has remained a meadow, mostly devoid of trees (see Figure 3). It should also be noted that the subject lands are not a pristine natural area. They have been heavily disturbed by machinery throughout the previous decades and were previously used for agriculture. In addition, unlike the abutting HNA, the subject lands are not considered part of the Core Natural Heritage Feature.

Through an aerial photography review, the subject properties appear to be untreed and cropped from 1946 to 1963. Aerial photography from 1997 shows the properties almost entirely graded / de-vegetated (see Figure 2).



Figure 2 – Subject Property in 1997



Figure 3 – Subject Property in 2023 (prior to installation of Wildlife Exclusion Fencing)

In June 2018, the current owner / Subdivision Applicant, 2140221 Ontario Inc., entered into an Agreement of Purchase and Sale (APS) to acquire the subject property from the City of Kitchener. The real estate transaction closed in June 2022, when the Purchaser (Subdivision Applicant) completed their due diligence.

The APS included various conditions, that required the Purchaser to, for example:

- Acknowledge that any development must include the provision of a trail link through the Property to link to the trails in Huron Natural Area to Strasburg Road.
- Enter into a restrictive covenant to prohibit the following land uses, despite any zoning permissions:
 - Transportation Depot (*not* permitted under current zoning);
 - Truck Transport Terminal (permitted under current zoning);
 - Warehouse (permitted under current zoning);
 - Wholesale (permitted under “Warehouse” under current zoning); or
 - Service and Storage of Motor Vehicles (*not* permitted under current zoning).

There are several transit routes in proximity to the subject property:

Route Number and Name	Approx. Distance from GRT Route to Subject Property	Nearest Road Alignment
Route 12 – Westmount	1,275 metres	Bleams Road
Route 16 – Strasburg-Belmont	0 metres (abutting)	Strasburg Road
Route 26 – Trillium	345 metres	Trillium Drive
Route 33 – Huron	0 metres (abutting)	Strasburg Road

The applicant has applied to the City of Kitchener for a Plan of Subdivision to develop the subject lands into a business park subdivision containing 10 industrial lots. Moreover, a 4.00 hectare (9.9 acre) block is proposed for the purposes of a created wetland (not a stormwater management pond) as an expansion to the abutting Huron Natural Area (HNA) and as a setback / buffer to protected natural features. Another block is proposed as a wildlife corridor to facilitate wildlife passage from the HNA to a nearby wetland / pond.

The current ‘Business Park Employment’ land use Official Plan designation and ‘Service Business Park Employment’ (EMP-4) zoning permit the proposed industrial uses and Official Plan and Zoning By-law Amendment applications are not required to facilitate the proposed subdivision.

REPORT:

The applicant is proposing a Draft Plan of Subdivision to develop the subject lands into a business park subdivision containing 10 industrial lots, ranging in size from 0.67 to 1.22 hectares (see Figure 4).

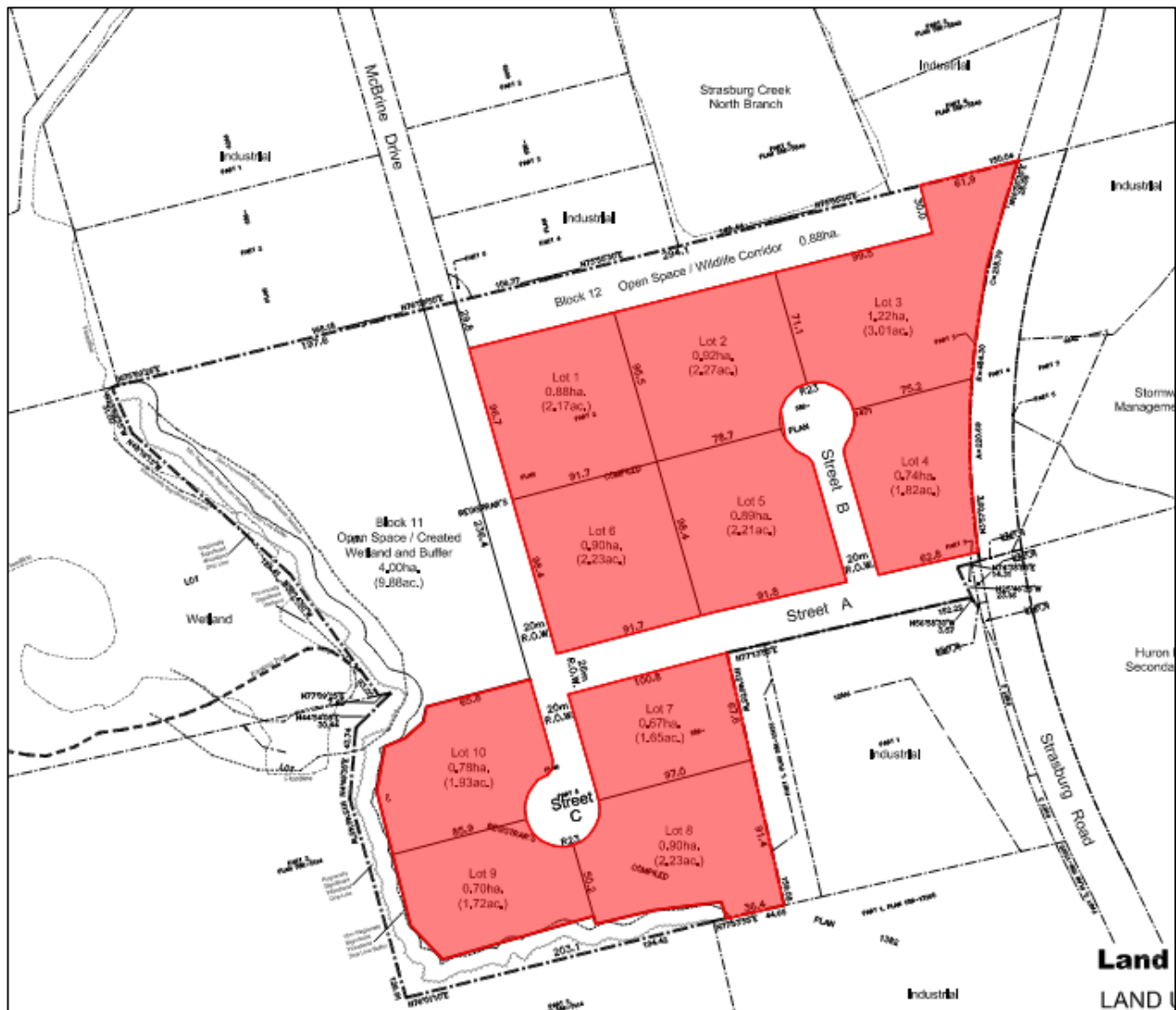


Figure 4 – Map Highlighting the Industrial Lots Proposed through the Draft Plan of Subdivision.

McBrine Drive would be extended from its current terminus 345 metres south of Trillium Drive to connect with a new street ('Street A'). 'Street A' would outlet to Straszburg Road. McBride Drive would terminate at a new cul-de-sac bulb. It is noteworthy that the north side of 'Street A' is proposed to contain a 3-metre wide City-owned Boulevard Multi-Use Trail (BMUT) to allow access from Straszburg Road to the east entrance to Huron Natural Area. The BMUT would turn north and run along the east side of McBride Drive to the northern boundary of the subdivision. This BMUT would replace the gravel trail that runs along a similar alignment that is currently within private ownership. Additionally, a 1.8 metre wide sidewalk would be provided along the south side of 'Street A' and the west side of the McBride Drive extension. Another cul-de-sac, 'Street B', is proposed off 'Street A'. 1.8 metre wide sidewalks would be provided along both sides of both cul-de-sacs. See Figure 5.

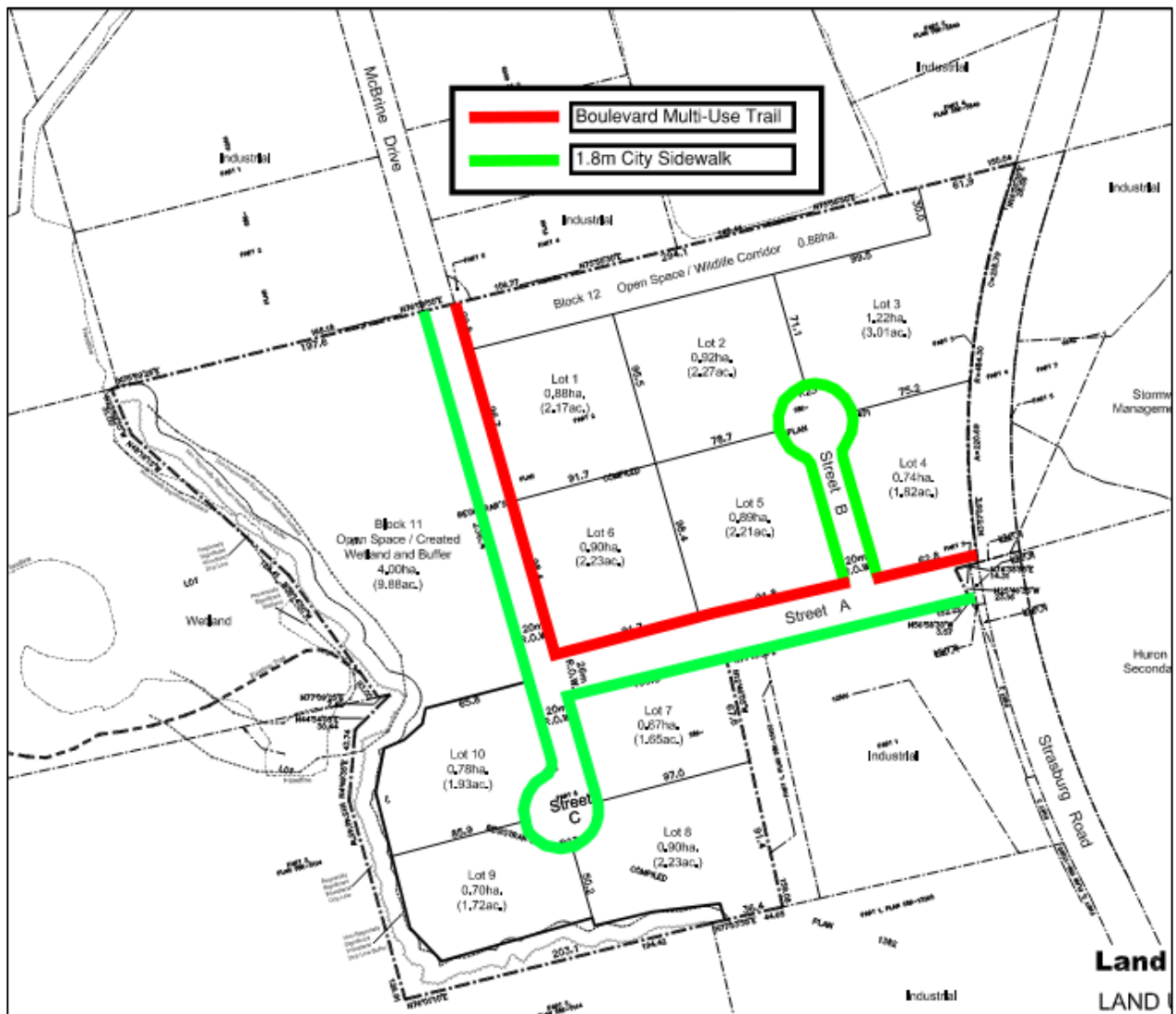


Figure 5 – Map Highlighting the BMUTs and Sidewalks abutting the Roads within the Proposed Subdivision.



Figure 6 – Map Highlighting the Created Wetland and Setback / Buffer Block (Block 11) and Wildlife Corridor Block (Block 12).

Natural Heritage System and Policy Framework

The subject property is adjacent to a Regionally Significant Woodland within the City-owned Huron Natural Area (HNA) to the west which also contains the Strasburg Creek Provincially Significant Wetland (PSW) Complex. Both features are part of the non-developable Kitchener Natural Heritage System (KNHS), and for which an Environmental Impact Study (EIS) is therefore required when development is proposed adjacent. In addition, a record of Blandings Turtle, a Provincially Threatened species, overwintering in a pond in the HNA means that an Overall Benefit Permit (under Section 17(1) and Clause 17 (2) (c) of the ESA) was required from the Province. Conditions of this permit must be implemented through the development process.

Despite the history of disturbance on the lands, through the field work for the EIS, habitat of some species of Special Concern was identified on the subject property, for which conditions of approval are required to ensure that mitigation is implemented through the development process. These species are the Snapping and Midland Painted Turtle and the Grasshopper Sparrow. The presence and habitat of terrestrial Chimney Crayfish was confirmed, its habitat

considered Significant Wildlife Habitat which will be incorporated in the created habitat Block 11 in the northwest corner of the property.

Mitigation measures to be implemented include:

- Buffers / setbacks / enhancement plantings adjacent to the woodland and wetland in the HNA to the west;
- Temporary (installed March 2024) and permanent wildlife exclusion fencing;
- Wetland and terrestrial habitat creation in Block 11 including protected turtle nesting and basking areas;
- Creation of a wildlife corridor in Block 12 including passage under the extension of McBrine Drive;
- Timing restrictions on vegetation removal to protect Species at Risk and of Special Concern;
- Awareness training for on-site contractors / construction workers; and
- Stewardship and education of new industrial lot owners.

Wildlife habitat and wetland creation is proposed in a 4.00 hectare (9.9 acre) Block (Block 11, see Figure 6) contiguous with the existing HNA to the west. This natural area to be created as part of this development will enlarge the HNA and provide enhanced, protected habitat for target wildlife species over current conditions. The EIS, reviewed and approved by the City, the Region, the GRCA and the Province, has outlined the details of this habitat creation, as well as recommended setbacks from adjacent Core Natural Heritage Features (PSW, Regionally Significant Woodland). This setback / buffer appears as a “tail” in Block 11 that extends south from the larger created upland/wetland habitat.

Another block (i.e., Block 12) is proposed as a 30-metre-wide wildlife corridor to facilitate wildlife passage from the HNA to the Strasburg Creek North Branch Stormwater Management Facility (i.e., a stormwater management pond located immediately to the northeast, outside of the proposed subdivision boundary). This block is nearly 300 metres in length. To protect wildlife from vehicles travelling along the extension of McBrine Drive, an ecopassage under the extension of McBrine Drive would be constructed.

Together, Blocks 11 and 12, the purpose of which is to support natural heritage features and functions, comprise 4.88 hectares (12.1 acres) of the 15.25 hectare (37.7 acre) subdivision plan land area or 31.6% (nearly one third). Both Blocks 11 and 12 are proposed to be conveyed to the City through draft approval conditions.

An excerpt of the Draft Plan of Subdivision Plan can be found at Figure 7 and statistics regarding the proposed subdivision lots and blocks can be found at Table 1.

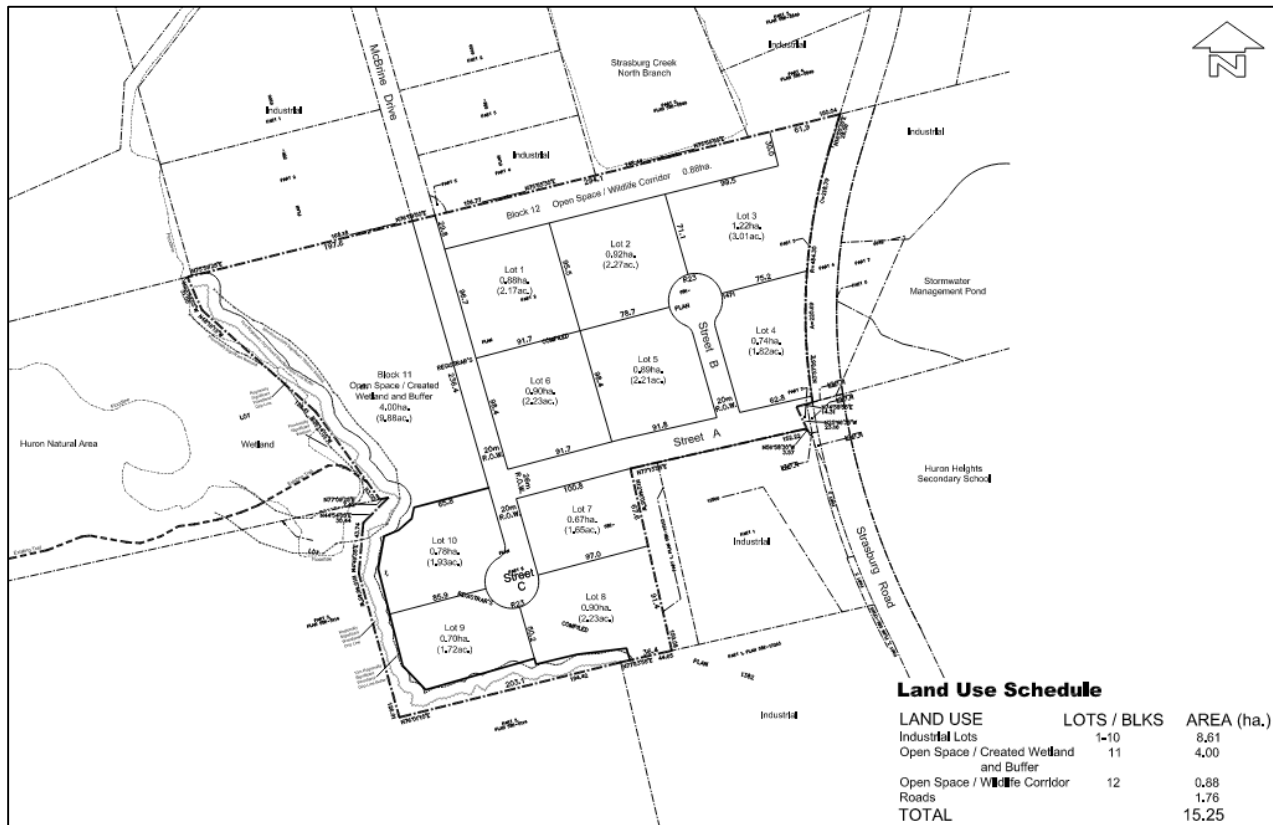


Figure 7 - Draft Plan of Subdivision.

Lot / Block ID	Proposed Land Use	Ultimate Ownership	Land Area (hectares)	Percentage of Overall Plan
Lot 1	Industrial Lot	Private	0.88	5.8%
Lot 2	Industrial Lot	Private	0.92	6.0%
Lot 3	Industrial Lot	Private	1.22	8.0%
Lot 4	Industrial Lot	Private	0.74	4.9%
Lot 5	Industrial Lot	Private	0.89	5.8%
Lot 6	Industrial Lot	Private	0.90	5.9%
Lot 7	Industrial Lot	Private	0.67	4.4%
Lot 8	Industrial Lot	Private	0.90	5.9%
Lot 9	Industrial Lot	Private	0.70	4.6%
Lot 10	Industrial Lot	Private	0.78	5.1%
Block 11	Created Wetland and Setback / Buffer to Protected Natural Features	Public	4.00 (9.9 acres)	26.2%
Block 12	Wildlife Corridor	Public	0.88	5.8%
Streets A, B, & C	Roads	Public	1.76	11.5%
Total	N/A	N/A	15.25 (37.7 acres)	100%

Table 1 – Statistics Regarding Proposed Subdivision Lots and Blocks.

Planning Analysis:

Planning Act, R.S.O. 1990, c. P.13 25:

Section 2 of the Planning Act establishes matters of provincial interest and states that the Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,

- (a) the protection of ecological systems, including natural areas, features and functions;
- (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;
- (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,
 - (i) is well-designed,
 - (ii) encourages a sense of place, and
 - (iii) 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.

Through the review of the subject application, staff has recommended conditions to ensure that ecological systems, including that the natural areas, features and functions that form Huron Natural Area are protected. This review involved the coordination of several public bodies, including the Province's Ministry of the Environment Conservation and Parks, Regional Municipality of Waterloo, and the Grand River Conservation Authority. Also, the subject application will help to increase the provision of employment opportunities and will help to protect the financial and economic well-being of the province and the city by facilitating industrial uses on 10 industrial lots – see *Need for Employment Uses* section of the report for more information (below). These matters of provincial interest are addressed and are implemented through the Provincial Planning Statement, 2024, as it directs how and where development is to occur. The City's Official Plan is the most important vehicle for the implementation of the Provincial Planning Statement, 2024 and to ensure provincial policy is adhered to.

Provincial Planning Statement, 2024 (PPS):

The Provincial Planning Statement (PPS), 2024 is a streamlined province-wide land use planning policy framework that replaces both the Provincial Policy Statement, 2020 and A

Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 while building upon housing-supportive policies from both documents. The PPS 2024 came into force on October 20, 2024.

The PPS 2024 enables municipalities to:

- plan for and support development, and increase the housing supply across the province
- align development with infrastructure to build a strong and competitive economy that is investment-ready
- foster the long-term viability of rural areas
- protect agricultural lands, the environment, public health and safety

There are several relevant sections of the PPS 2024 that relate to employment areas, for example:

Section 2.1.6 of the PPS 2024 promotes achievement of complete communities by accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses, recreation, parks and open space, and other uses to meet long-term needs.

Section 2.8.1 promotes economic development and competitiveness by, for example: “a) providing for an appropriate mix and range of employment, institutional, 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.”

Section 2.8.2.1 states that, “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.”

Section 2.8.2.3, states that, “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.” Note that residential and sensitive land uses, commercial, institutional uses are prohibited in employment areas, to ensure their protection.

Also, there are several relevant sections of the PPS 2024 that relate to Natural Heritage, for example:

Section 4.1.1 states that, “Natural features and areas shall be protected for the long term.”

Section 4.1.2. states that, “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.”

Section 4.1.5., states that, “Development and site alteration shall not be permitted in:...d) significant wildlife habitat...unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.”

Section 4.1.7., states that, “Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.”

DHA staff is of the opinion that the proposed development conforms to the PPS 2024 since it would help the city to achieve complete community and would promote economic development and competitiveness by providing additional opportunities for diversified industrial (employment) use to meet long-term needs. The proposal would assist in realizing the employment uses that are planned for this employment area.

Moreover, the proposed development would help to protect the natural features and functions of the abutting Huron Natural Area (HNA) by expanding the HNA through the dedication to the City of a 4.00 ha (9.9 acre) parcel of land abutting the HNA as a created wetland block and by establishing a setback / buffer between the proposed industrial lots and natural heritage features. Staff is of the opinion that the proposed purpose-built wetland that will be designed in accordance with the EIS will provide better wildlife habitat than the existing wetlands that were inadvertently created through unplanned grading and dereliction. Also, ecological function and biodiversity of natural heritage systems is promoted through the dedication to the City of a 30-metre-wide wildlife corridor block to facilitate wildlife passage from the HNA to the nearby wetland / pond to the northeast.

Regional Official Plan (ROP):

The Region of Waterloo is an upper-tier municipality without planning responsibilities. The More Homes Built Faster Act, 2022, amended the Planning Act by transferring planning responsibilities from upper-tier governments across the Province, including the Region of Waterloo to local municipalities. The Region is responsible for commenting on the infrastructure and service delivery that the Region of Waterloo delivers to the community, such as Public Health and Paramedic Services, Affordable Housing, source water protection, water and wastewater infrastructure, transit and transportation, waste management, and the Region of Waterloo International Airport. As a result, the Region no longer has a ROP as it is now an Official Plan for area municipalities who are responsible for implementation of the ROP until it is repealed through a future Area Municipal planning exercise.

The subject property is within the ‘Urban Area’ and ‘Designated Greenfield Area’, as shown on *Map 2 – Urban System* of the Regional Official Plan (ROP). Urban Area policies of the ROP identify that the focus of the Region’s future growth will be within the Urban Area. The ROP directs most of the region’s future growth within the Urban Area to

delineated built-up areas through intensification. However, new development is also directed to designated greenfield areas, to accommodate some of the Region's forecasted growth. Development within both the built-up areas and designated greenfield areas is intended to contribute to the establishment of 15-minute neighbourhoods which contain a broad mix of land uses where people can meet their daily needs for goods, services, and employment within a 15-minute trip by walking, cycling, and rolling, and where other needs can be met by using direct, frequent, and convenient transit.

The majority of the subject property is designated within the Regional Official Plan as 'Employment Area' on *Map 3 – Employment Areas*. The ROP states that such areas are protected for employment (industrial) uses. Commercial and Residential uses are not permitted in these areas. Part of the reason for these protections is to ensure that compatibility issues do not arise, between industry and more sensitive land uses and to ensure that industry can flourish without the need to scale-back to ensure compatibility.

After the review and approval of the Environmental Impact Assessment submitted by the applicant in support of the proposal, the limit of the abutting 'Core Environmental Feature' on *Map 4 – Greenlands Network* abutting the western fringe of the subdivision, has been refined based on site-specific details for the protection of Huron Natural Area. Accordingly, a portion of the subject property is now identified as 'Core Environmental Feature' (Block 12). These lands will be conveyed to the City via a draft approval condition.

Regarding Core Environmental Features, the ROP states

7.C.1 Core Environmental Features are those environmental features identified as being provincially significant or regionally significant. These features are the most significant elements of the regional landscape in terms of maintaining, protecting and enhancing biodiversity and important ecological functions. Core Environmental Features are designated as shown on Map 4. The Core Environmental Features designation applies to lands that meet the criteria as:

- (a) Significant Habitat of Endangered or Threatened Species;
- (b) Provincially Significant Wetlands;
- (c) Environmentally Sensitive Policy Areas;
- (d) Significant Woodlands;
- (e) Environmentally Significant Valley Features; or
- (f) Significant Areas of Natural and Scientific Interest.

DHA staff is of the opinion that the application conforms to the ROP, since it would facilitate development and growth within the 'Urban Area' that contributes to the establishment of 15-minute neighbourhoods (i.e., complete community). Also, the proposal would facilitate the establishment of employment (industrial uses) which are intended within Employment Areas. In addition, the 'Core Environmental Feature' is proposed to be protected from development through the creation of a wetland on Block 11 and a setback / buffer along the western fringe of the subject property – and conveyance of this block to the City – as an expansion of Huron Natural Area.

City of Kitchener Official Plan (OP):

The City of Kitchener OP provides the long-term land use vision for Kitchener. The vision is further articulated and implemented through the guiding principles, goals, objectives, and policies which are set out in the Plan. The Vision and Goals of the OP strive to build an innovative, vibrant, attractive, safe, complete, and healthy community.

The subject lands are primarily within the Designated Greenfield Area, as outlined on *Map 1 – City Urban Area and Countryside*. The Official Plan states that “Although much growth will be accommodated within the Built-Up Area, the Designated Greenfield Area is also an important location for planned growth. Development in these areas will contribute to a healthy, complete and balanced community. Generally, new development in this area will be planned and designed based on transit routes (existing and planned) and walkability.”

It should be noted that the section of Strasburg Road abutting the subject property is identified as a Planned Transit Corridor on *Map 2 – Urban Structure* of the Official Plan.

Urban Structure:

The majority of the subject property is identified as ‘Industrial Employment Areas’ on *Map 2 - Urban Structure* of the Official Plan. The planned function of Industrial Employment Areas is to support and maintain economic activity in the city by providing an adequate supply of land for a range of industrial-related employment uses and appropriate accessory and ancillary uses. Employment growth and intensification is anticipated and encouraged within Industrial Employment Areas. DHA staff is of the opinion that the proposed subdivision conforms to the Industrial Employment Areas policies of the Official Plan, since the subdivision will facilitate employment uses.

After the review and approval of the Environmental Impact Assessment submitted by the applicant in support of the proposal, the limit of the abutting ‘Green Areas’ land use designation abutting the western fringe of the subdivision, has been refined based on site-specific details for the protection of Huron Natural Area. Accordingly, a portion of the subject property is now identified as ‘Green Areas (Block 12)’. These lands will be conveyed to the City via a draft approval condition.

Per the Official Plan, “The planned function of Green Areas is to protect and conserve the ecological functions and features and passive and active recreation that these areas provide.”

DHA staff is of the opinion that the proposed subdivision conforms to the Green Areas policies of the Official Plan, since it will protect these lands from development through the creation of a wetland on Block 11 and a setback / buffer along the western fringe of the subject property – and conveyance of this block to the City – as an expansion of Huron Natural Area.

Land Use Designation:

The majority of the subject property is designated ‘Business Park Employment’ on *Map 3 – Land Use*. The Business Park Employment land use designation applies to lands which

are planned as a unit and tend to be regarded as a prestigious location for certain industrial uses due to its access to major transportation corridors, high visibility, and distinct identity. This designation permits a wide range of manufacturing and other employment uses. DHA staff is of the opinion that the proposed subdivision conforms to the 'Business Park Employment' policies of the Official Plan, since the subdivision will facilitate employment uses.

Need for Employment Uses:

Economic Development staff advises that there are currently less than 40 hectares (100 acres) of undeveloped land held by the private sector that can be developed for industrial / employment use within the City of Kitchener. When this supply of land has been developed, there will be no further land available for future industrial development. It is extremely difficult to create new employment areas.

The proposed Plan of Subdivision represents the current demand from prospective industrial users, with lots between 0.7 and 1.2 hectares (1.7 and 3.0 acres). Industrial purchasers want the ability to design-build new spaces to meet their requirements and specifications, rather than divide existing, larger spaces, which is not economical.

Advanced manufacturing is a critical industry sector representing 18% of Kitchener's local economy. Manufacturing in the Kitchener Census Metropolitan Area currently employs 71,900 people. The proposed Plan of Subdivision has the potential to create up to 1,800 new high value manufacturing jobs (i.e., 2.5% increase), including advanced manufacturing, with additional new jobs created within the local supply chain. Kitchener is one of the fastest growing Census Metropolitan Areas in Canada.

Canada's highly educated and skilled workforce is an asset for manufacturers seeking talented professionals. The second phase of Conestoga College's School of Trades and Apprenticeship is designed to provide trades to support the local manufacturing sector. Innovation is paramount for ongoing success with research completed in partnership with the University of Waterloo and Conestoga College. Furthermore, manufacturers and innovators employ co-op students from the University of Waterloo, Wilfred Laurier University and Conestoga College, providing them with hands on practical experience enabling them to advance their learnings. In summary, partnerships between the manufacturing / employment uses that would be facilitated through the proposed Plan of Subdivision and local post-secondary institutions have the potential to create synergy and innovation that is beneficial to both, thereby benefiting the economy as a whole.

In this case, the subject lands are currently planned for employment uses through the Official Plan (and zoning), and the lands are already included within Huron Business Park boundary. The proposed Plan of Subdivision represents a logical next step in developing Huron Business Park, noting that employment uses are the only suitable uses for these lands (not commercial or residential). Moreover, the subject lands have been disturbed since at least the 1940s and are not considered a Core Natural Heritage Feature. After the review and approval of the Environmental Impact Assessment submitted by the applicant in support of the proposal, the limit of the abutting 'Natural Heritage Conservation' land use designation abutting the western fringe of the subdivision, has been refined based on site-specific details for the protection of Huron Natural Area.

Accordingly, a portion of the subject property is now designated as 'Natural Heritage Conservation' (Block 12). These lands will be conveyed to the City via a draft approval condition.

Per the Official Plan, "The primary intent of the 'Natural Heritage Conservation' land use designation is to protect and/or conserve our natural heritage features and their ecological functions."

DHA staff is of the opinion that the proposed subdivision conforms to the Natural Heritage Conservation policies of the Official Plan, since it will protect these lands from development through the creation of a wetland on Block 11 and a setback / buffer along the western fringe of the subject property – and conveyance of this block to the City – as an expansion of Huron Natural Area.

As aforementioned, since the proposal conforms fully to the Official Plan, an Official Plan Amendment is not required.

Zoning By-law 2019-051:

The entirety of the subject property is zoned 'Service Business Park Employment Zone (EMP-4)'. The purpose of this zone is to accommodate industrial uses and limited complimentary uses that support adjacent employment lands. Lands that are zoned 'EMP-4' are to be located within 450 metres of existing or planned transit corridors (note that the subject site directly abuts a Planned Transit Corridor on Strasburg Road). The 'EMP-4' Zone permits a wide range of industrial uses, including, for example: manufacturing (excluding noxious uses); repair operations; printing and publishing operations; recycling operations; Computer, Electronic, Data Processing, or Server Establishment.

As aforementioned, the proposed industrial lots comply with the Zoning By-law. In this regard, a Zoning By-law Amendment is not required to facilitate the subdivision. In this regard, it is worth noting that the subject lands could be developed now with a large employment use, through a Site Plan Application, without any Council approvals (e.g., a large factory). This application is simply facilitating the technical division of land only (e.g., to create conveyable lots and streets). However, through this subject Subdivision Application, the City is able to leverage the Draft Approval conditions to comprehensively implement the EIS, including requiring the creation of a purpose-built wetland, setback / buffer to key environmental features, etc.

Through a future housekeeping amendment to the Zoning By-law, DHA staff will ensure that the zoning is amended to be consistent with the refinements to the boundaries of the Natural Heritage Conservation land use designation (following the review and approval of the Environmental Impact Assessment submitted by the applicant in support of the proposal).

Community Input and Staff Responses:

Staff received written responses from 14 community members with respect to the proposed subdivision (9 community members provided written comments, while 5 requested additional information only). The comments received are included in Attachment 'E'. A virtual neighbourhood meeting was held on September 4, 2025. It should also be

noted that staff was made aware of an online petition that relates to this application and a few other planning-related applications, all of which are adjacent to the HNA. At the writing of this report, the petition had not been submitted to staff and it claims to have “3,526 verified signatures.” The petition is available here: <https://www.change.org/p/stop-the-development-surrounding-the-huron-natural-area-in-kitchener>. A summary of what staff heard from the community, and staff responses are noted below.

WHAT WE HEARD



46 property owners and tenants were circulated and notified.



14 community members provided comments by email or telephone.



A City-led Virtual Neighbourhood Meeting was held on September 4, 2025 and approximately 28 different users logged on.

What We Heard	Staff Comment
<p>This is an area that is attached to the Huron Natural Area and should be maintained as a natural area for wildlife. This area is an invaluable ecological and cultural resource, and further development would significantly harm its delicate ecosystems. The proposed development poses risks to local wildlife, including at-risk species such as turtles, and would contribute to habitat fragmentation and environmental degradation.</p>	<p>The City agrees that the Huron Natural Area (HNA) is a significant component of Kitchener’s Natural Heritage System (KNHS). That is why the City has been acquiring properties there since the early 1990s, and has protectively zoned all of it as well. The lands that are the subject of this Draft Plan of Subdivision were never part of the HNA and are not part of the HNA. In addition, the subject lands are outside of the Core Natural Heritage Features (Provincially Significant Wetland and Regionally Significant Woodland). The subdivision lands are <i>adjacent to</i> the KNHS / HNA. Therefore, a comprehensive Environmental Impact Study (EIS) was required to be completed, reviewed and approved by the Province, the Region, the GRCA and the City. Recommendations for avoidance and mitigation are made in the EIS and will be implemented through conditions of approval. In this way, no adverse environmental impacts are anticipated. In fact, the biophysical environment will be enhanced with this application to provide higher quality habitat for wildlife.</p>
<p>Is the setback / buffer to Huron Natural Area sufficient?</p>	<p>An EIS was required to be completed, reviewed and approved by the Province, the Region, the GRCA and the City. Recommendations for avoidance and</p>

	<p>mitigation, including setbacks / buffers are made in the EIS and will be implemented through conditions of approval. The EIS was reviewed and approved by the City, the Region, the GRCA and the Province.</p>
<p>How will the wildlife corridor work and how will it be maintained?</p>	<p>The wildlife corridor connects the larger HNA to the west, the created upland / wetland Block 11, under the future McBrine extension via an appropriately designed ecopassage to Block 12, a 30m-wide wildlife corridor to be appropriately designed to provide access to a mostly natural wetland / pond to the northeast. Blocks 11 and 12 will be owned and maintained by the City in the fullness of time, after a period of years of monitoring by the Developer to ensure these habitats are functioning as intended. Final detailed design of Block 12 is required through Draft Approval conditions, to satisfaction of applicable agencies.</p>
<p>Why are trees permitted to be removed adjacent to the Huron Natural Area?</p>	<p>Trees are permitted to be removed throughout the city under certain circumstances, and consistent with any applicable bylaws, conditions of development registered on the title of properties, easements and/or study processes outlined in the City's <i>Tree Management Policy</i>. In this case, the Subdivider is required to follow the methods outlined in the <i>Tree Management Policy</i> and any conditions of approval. Unless hazardous, trees in any setback / buffer areas will not be removed; future study will confirm.</p>
<p>The preliminary salt load analysis conducted states "...mitigative measures will be required for the proposed Site Plan developments to address potential impacts on groundwater quality and Salt Management Plans should be prepared for all industrial lots within the proposed development subject to the Site Plan Approval process". Who is responsible for these recommended mitigative measures?</p>	<p>The Region (responsible for groundwater protection / risk management) advises that the applicant will be responsible for the cost of planning and implementing the recommended mitigative measures associated with chloride impacts, including, but not limited to, salt management plans. The recommendations must be accepted by the Region, prior to implementation.</p> <p>The Region must review and accept Salt Management Plans (SMP) and Stormwater Management (SWM) briefs for individual lots as a condition of draft plan approval. This review is to ensure that lot-level plans align with the overall SWM strategy for the subdivision, which has been carefully reviewed by Regional staff who are knowledgeable about and responsible for long-term source water protection. These staff will continue to provide input and oversight on how properties are designed and developed to protect groundwater quality from potential salt impacts as the subdivision builds out.</p> <p>Salt Management Plans are educational tools, though they do allow landowners to identify ways to lower winter maintenance costs and qualify for lower</p>

	<p>insurance premiums. Through the review/acceptance process, they also contribute to final site design (e.g. by identifying designated impervious snow storage locations). City and Regional staff are committed to ensuring that Site Plan Approvals for these blocks are reflective of recommendations in both the SWM briefs and SMPs to reduce salty runoff.</p> <p>As noted above, all stormwater from the proposed subdivision will be directed through storm sewers to the Strasburg Stormwater Management Pond, located on the opposite side of Strasburg Road – away from the HNA. No stormwater will be directed towards the HNA.</p>
<p>It appears that this proposed development is within 10 km of the Haldimand Tract/Grand River Corridor. What is the plan to include the Indigenous community in this proposed development?</p>	<p>DHA staff can confirm that all current Subdivision, Official Plan Amendment, and Zoning By-law Amendment Applications have been circulated to Six Nation of the Grand River Elected Council (SNGREC) for comments, including the subject application. See below section entitled, <i>Department and Agency Comments</i> for SGREC’s comments and City staff responses.</p>

Department and Agency Comments:

The Draft Plan of Subdivision Application was circulated to all applicable City departments and other review authorities on February 16, 2023. Through the application review and recommended draft approval conditions, staff has addressed all comments.

However, it should be noted that Six Nations of the Grand River Elected Council (SNGREC) provided written comments to the City, dated October 15, 2025 (see Attachment ‘D’). In addition to a discussion with SNGREC staff on October 10, 2025, DHA staff has provided the following response table:

SNGREC Comment	Planning and Housing Policy / Development and Housing Approvals Staff Response
<p>This proposal will result in particularly severe impacts to Aboriginal and Treaty Rights. The land will not be returned to a natural state and will impact the environment through emissions and use of resources.</p>	<p>While it is true that the land will not be returned to a natural state, the proposed subdivision will essentially benefit the abutting Huron Natural Area by expanding its borders and ensuring adequate setbacks to natural features.</p>
<p>SNGREC requests a wetland compensation ratio of 3:1 on-site or 4:1 off-site.</p>	<p>The existing wetlands are anthropogenic (“human-made”) – a result of abandoned development / area grading, ecologically very immature, and can be considered to be having a negative environmental impact. City; GRCA (prior to recent mandate changes); the Ministry of</p>

	Natural Resources (MNR); and the Ministry of Environment, Conservation and Parks (MECP) have deemed these wetlands eligible for removal as they are not environmentally beneficial to the Blanding's Turtle habitat, nearby Provincially Significant Wetland and/or Regionally Significant Woodland.
Please include SNGREC in consultation on the detailed design of the wetland area.	City staff confirms that SNGREC has been included in the draft approval conditions as an agency that must be consulted as part of detailed design of the created wetland.
The presence of invasive plant species is also a threat to the success of the wetland. SNGREC requests the removal of invasive species from the property before wetland creation is finished and a thorough monitoring and management plan for invasive species on the property extending for a minimum of 5 years which resets if invasive species establish in this wetland.	This is part of the Detailed Vegetation and Habitat Creation / Buffer Planting Plans to be finalized after Draft Plan Approval and is committed to in the EIS. Also, 5 years of monitoring is required by the Overall Benefit Permit (MECP) as well as by the City.
What contingency plans will be prepared for the wetlands in case of habitat failure, and how much contingency funding will be allocated for these contingency plans?	The City will be taking a Letter of Credit for wetland creation and buffer planting.
SNGREC requests 41m buffers from all wetlands.	Buffers are best determined on a site-specific basis through completion, review and approval of a Scoped EIS. This has been done for this application and the proposed buffers in the site-specific EIS are supported by City environmental planning staff.
The woodlot around lots 8, 9, and 10 is only given a 10m buffer despite being directly connected to HNA.	Buffers are best determined on a site-specific basis through completion, review and approval of a Scoped EIS. This has been done for this application and the proposed buffers in the site-specific EIS are supported by City environmental planning staff.
The three proposed turtle nesting areas are all proposed within the 15m buffer, meaning that the nesting areas themselves do not have their own buffers.	The created turtle habitat, most specifically Blandings Turtle habitat, has been assessed by MECP Species At Risk (SAR) staff and an Overall Benefit Permit WC-C-006-23 has been issued by the Minister (MECP) under the <i>Endangered Species Act</i> (Section 17(1) and Clause 17 (2) (c)) on January 28, 2025.
While exclusion fencing is important to reduce road mortality, it also	The purpose of the proposed Wildlife Corridor (i.e., Block 12 on the Plan of Subdivision) is to

<p>further restricts animal species, creating new hazards such as predatory choke points, reducing potential nesting and foraging, and reducing habitat connectivity. SNGREC requests that this is compensated for by reducing the scale of this development and improving habitat connectivity. SNGREC requests that exclusion fencing includes access from the development side for small creatures in case they end up on the wrong side or travel from elsewhere.</p>	<p>improve wildlife connectivity. Also, exclusion fencing specifications are to the satisfaction of the Minister (MNR) under the conditions of the Endangered Species Act (ESA) permit. Further, plans for such fencing can be reviewed by SNGREC as part of design after DP approval.</p>
<p>SNGREC requests the removal or deviation of the McBrine Drive southerly extension away from the created wetland. SNGREC acknowledges that the southerly extension is needed for emergency access, but requests the exploration of other options that could have reduced environmental impacts.</p>	<p>The extension of McBrine Drive is necessary to have two means of access to the subdivision, for emergency services reasons [see Section 3.1c) of the City's Emergency Services Policy], as well as to ensure efficient access to and through the subdivision. Also, to protect wildlife from vehicles travelling along the extension of McBrine Drive, an ecopassage under the extension of McBrine Drive will be constructed. In addition, if the McBrine Drive extension was removed or relocated, it would drastically change the lotting and road layout, significantly reducing the number of industrial lots and subdivision functionality. Through the future detailed design of the created wetland subdivision block, an increased buffer between the created wetland boundary itself and the McBrine Drive extension may be considered.</p>
<p>SNGREC requests that native plant species are prioritized in landscaping efforts, and that invasive or potentially invasive species are completely avoided. Please provide SNGREC with a landscape plant list before procurement begins.</p>	<p>All plantings immediately adjacent to the Natural Heritage System (NHS) must be consistent with the plant list for areas adjacent to the NHS (e.g. buffers / Created habitat in Block 11). This will be ensured through the City's approval of the design for these areas. Staff can certainly share the plans with SNGREC at that time. Staff has revised a recommended draft approval condition to include that SNGREC must be consulted regarding the species to be planted.</p>
<p>SNGREC appreciates the City of Kitchener's commitment to replant any shrubs that do not survive.</p>	<p>The City would not accept the planting and release the Letter of Credit with unacceptable levels of "die-off" of planted material.</p>
<p>Please clarify what situations would require tree removal within the bird breeding and active bat season. SNGREC disapproves of this clause</p>	<p>In the City's experience, Landowners observe these removal windows 100% of the time, as it is expensive to have biologist sweeps concurrent with removals. The City is obligated to give the</p>

<p>except for in hazardous situations such as trees that are expected to fall in a dangerous manner.</p>	<p>alternative, as that is how relevant governing legislation is written since there may be circumstances like the one identified (e.g., hazards) that may arise.</p>
<p>SNGREC requests that the buildings and streetscapes are designed using bird and light friendly practices. This includes minimizing reflective surfaces, creating visual markers on windows, and directing light downwards.</p>	<p>The City's <i>Urban Design Manual</i> contains "Design for Wildlife" Guidelines, which are intended to be applied through the Site Plan Approval Process (includes bird-friendly practices). For example:</p> <ul style="list-style-type: none"> • "All development is to meet a Dark Sky compliant standard by using full cut-off fixtures with no uplighting (U0). A Dark Sky standard reduces light pollution, improving the well-being, health and safety of both people and wildlife and resulting in less energy usage." • "Migratory birds move through cities at night. In order to preserve dark skies and to lessen migratory bird strikes, consider automated lighting to reduce unnecessary interior light." • "Design the first 12m of a building to prevent bird strikes by limiting the potential for reflection of trees and sky through material choice and detailing."

Copies of the department and agency comments are found in Attachment 'D' of this report.

The following reports and studies were considered as part of the subject applications:

Planning Justification Report
 Prepared by: GSP Group, February 6, 2023

Updated Urban Design Brief Strasburg Technology Business Park
 Prepared by: GSP Group, dated May 2025, Amended September 2025

Amended Environmental Impact Study
 Prepared by: GHD, March 2025

Functional Servicing and Stormwater Management Report
 Prepared by: Walter Fedy, October 21, 2022

Preliminary Salt / Chloride Loading Analysis
 Prepared by: Walter Fedy, January 23, 2023

Planning Analysis and Conclusions:

Development and Housing Approvals staff recommends approval of the Draft Plan of Subdivision Application, subject to the conditions outlined in this report. Staff also recommends that the associated Urban Design Brief be endorsed and be implemented through the recommended subdivision conditions and future Site Plan Applications. The development proposal represents good planning. The subject lands are outside of the abutting Huron Natural Area (HNA) and Core Natural Heritage Feature (Provincially Significant Wetland and Regionally Significant Woodland) and have been planned for employment uses since 1983. A wetland and setback / buffer to protect natural features will be created and conveyed to the City as an expansion to the abutting HNA. The proposed development represents a desirable balancing of interests, including creating viable lots for employment growth while protecting, expanding, and enhancing the abutting Core Natural Heritage Feature.

STRATEGIC PLAN ALIGNMENT:

This report supports the delivery of core services.

FINANCIAL IMPLICATIONS:

Capital Budget – The recommendation has no impact on the Capital Budget.

Operating Budget - Upon registration, there will be ongoing operations costs for the maintenance of the sidewalks, streets, street trees, underground services, created wetland, wildlife corridor, and other infrastructure which is being dedicated to the City. In the long term, there will be repair and replacement costs for streets, sidewalks and services. Following registration, there will be ongoing revenue in the form of industrial property tax revenue. Development Charges will be paid to the City, the Region, and school boards at the time of building permit issuance.

COMMUNITY ENGAGEMENT:

INFORM – This report has been posted to the City’s website with the agenda in advance of the Council / Committee meeting. Two notice signs were posted on the property and information regarding the application was posted to the City’s website in February 2023 (and updated, as necessary throughout the review period). An additional postcard advising of the statutory public meeting would normally be forwarded to all residents and property owners within 240 metres of the subject property and those who responded to the preliminary notice, however due to the Canada Post Strike this was unable to be done. Instead, an email notice was provided on October 10, 2025 to everyone who provided written comments. A Virtual Neighbourhood Meeting was held on September 4, 2025. Notice of the Statutory Public Meeting was also posted in The Record on October 3, 2025 (a copy of the Notice may be found in Attachment ‘C’).

CONSULT – The proposed Draft Plan of Subdivision Application was circulated to residents and property owners within 240 metres of the subject lands in February 2023. In response to this circulation, staff received written responses from 14 community members, which are summarized as part of this staff report and is appended in Attachment ‘E’. DHA staff also had one-on-one conversations with residents on the telephone and responded to emails.

PREVIOUS REPORTS/AUTHORITIES:

- [Planning Act, R.S.O. 1990, c. P.13](#)
- [Provincial Planning Statement, 2024](#)
- [Region of Waterloo Official Plan](#)
- [City of Kitchener Official Plan, 2014](#)
- [City of Kitchener Zoning By-law 2019-051](#)

REVIEWED BY: Tina Malone-Wright, Manager of Development Approvals
Barbara Steiner, Senior Environmental Planner

APPROVED BY: Justin Readman, General Manager of Development Services

ATTACHMENTS:

Attachment A – Draft Plan and Conditions of Draft Approval

Attachment B – Updated Urban Design Brief Strasburg Technology Business Park,
prepared by GSP Group, dated May 2025, amended September 2025

Attachment C – Newspaper Notice

Attachment D – Department and Agency Comments

Attachment E – Community Comments