

MEMORANDUM

Date: January 27, 2026

Subject: Review Memorandum of Withheld Amendments of Official Plan Amendment 163

To: Ian Kerr, Regional Director, Ministry of Municipal Affairs and Housing
Erick Boyd, RPP, MCIP, Manager, Community Planning & Development, Ministry of Municipal Affairs and Housing
David Stubbs, Planner, Ministry of Municipal Affairs and Housing

From: Alisha Cull, RPP, MCIP, Manager of Planning Services/Acting Director, Planning and Realty Services, Norfolk County

CC: Al Meneses, Chief Administrative Officer, Norfolk County
Bill Gridland, General Manager, Community and Development Services, Norfolk County

Memorandum Objectives

- 1) Provide a high-level update of the residential land need assessment based on updated Ministry of Finance population projections (from August 2025);
- 2) Provide further planning review of the withheld urban residential lands of southern Part 1 in Simcoe that were adopted by Council;
- 3) Inform about First Nations consultation outcomes;
- 4) Provide final staff recommendations.

Background

The GROW Norfolk study was initiated in 2021 as part of Phase I of the Municipal Comprehensive Review of the Norfolk County Official Plan. The initial population, households, and employment projections study was presented to Council in December 2021. GROW Norfolk included a review of residential and employment growth scenarios as well as an assessment of urban and employment land need per each settlement area.

A new Provincial Planning Statement (PPS) came into effect in October 2024 and included amendments pertaining, but not limited to, the requirement of having available lands to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years but no more than 30 years, informed by provincial guidance; the requirement of establishing and implementing minimum targets for intensification and redevelopment within built-up areas and designated growth areas; and amendments to employment areas policies.

Official Plan Amendment (OPA) 163 that amends the urban settlement areas was adopted by Norfolk County Council on May 22, 2024. The Ministry of Municipal Affairs and Housing (MMAH) issued a partial approval of Council's adopted items on September 5, 2025, through the [Environmental Registry of Ontario website](#). A final decision was withheld for nine matters that were deemed inconsistent with provincial policy, more specifically policy 2.3.2 "New Settlement Areas and Settlement Area Boundary Expansions".

A high-level update of the land need assessment was conducted based Ministry of Finance (MOF) issued [49 Census Divisions MOF Population Projections](#) in August, 2025. The revised urban residential and employment lands need assessment was peer-reviewed by Watson & Associates Economists, the consultant involved in the initial GROW Norfolk population, households and employment analysis. The findings were used to provide a review of the PPS requirement relative to the need to designate and plan for additional land of policy 2.3.2.1.a) and all remaining requirements under policy 2.3.2.

Updated Population, Households, Employment Projections

A high-level population projections update based on proportional share analysis of the Haldimand-Norfolk Census Division population projections provides an overall population increase from 92,700 to 99,006 within Norfolk County by 2051, representing a population share of 57.7%

To align with the methodology used in the initial demographic forecasts, the historical average person per unit (PPU) was used as opposed to the average household size. Phase 1 Growth Analysis Report identified a decrease in average P.P.U. from 2.54 in 2021 to 2.51 by 2051 that informed the revised households forecasts to 38,475 by 2051.

The peer-review indicates that an activity rate-based framework was used to determine employment forecast proportionally with population forecasts and concludes that "*Based on the approach and broad assumptions noted above, the total employment growth by 2051 is estimated to be closer to 37,000 jobs. From this total about 1,600 are expected to be accommodated in urban Employment Areas*". Accordingly, the overall County-

wide Employment Area land deficit is estimated at about 40 hectares which should be addressed as part of an Employment Land Strategy and municipally initiated Official Plan Amendments to delineate employment lands.

Revised Residential Lands Demand

The updated residential land need assessment factors in the approved OPA 163 urban residential lands expansions in Delhi, Waterford and Courtland as detailed in Table 1 below and excludes the approved lands from the updated deficit. The peer review of the updated residential lands need is provided in Attachment A.

A Council-in-Committee staff report dated November 15, 2023, provided a recommendation that *“Growth Option (Hybrid) be endorsed and utilized as an input to amendment and review of the Norfolk Official Plan”*. The recommendation was endorsed by Council and adopted in the meetings minutes. Accordingly, it is noted that the intensification target within the built-up areas as approved by Council is 30% under the High Growth (Hybrid) option.

The approach to the updated residential land need assessment was based on household growth rather than population growth. As such, the urban residential lands deficit over the 30-year forecast period is estimated to be 105 hectares located in the settlement area of Simcoe. Staff note that the initial analytical approach used in the GROW Norfolk study land needs assessment considers each settlement area on an individual basis. For the purpose of this review, this approach is carried out to further confirm that residential lands demand is located exclusively in Simcoe.

Staff note that the households supply data used in the peer-review was provided by County staff in 2023. Based on more recent County households supply data from 2025, the deficit has been reduced to 95 hectares.

Table 1 Revised Residential Lands Need

| Settlement Area | Updated Households Demand (2021 - 2051) | Households within urban built-up areas (30%) | Households within Greenfield areas | Greenfield Units Available (Based on Supply Data in County Analysis) | Unit Surplus / Deficit | Greenfield Lands to be added (ha) | Add Lands approved by the Province under OPA#163 (ha) | Revised Overall Surplus / Deficit (ha) |
|--|---|--|------------------------------------|--|------------------------|-----------------------------------|---|--|
| Simcoe | 4,400 | 1,408 | 2,992 | 1,870 | - 1,122 | -105 | 0 | -105 |
| Delhi | 2,490 | 797 | 1,693 | 632 | - 1,061 | - 99 | 103 | 4 |
| Waterford | 1,900 | 608 | 1,292 | 670 | - 622 | - 58 | 64 | 6 |
| Port Dover | 1,310 | 419 | 891 | 3,797 | 2,906 | 272 | 0 | 272 |
| Port Rowan | 480 | 154 | 326 | 970 | 644 | 60 | 0 | 60 |
| Courtland | 480 | 154 | 326 | 165 | - 161 | - 15 | 21 | 6 |
| Norfolk County Census Subdivision | 11,890 | 3,539 | 7,521 | 8,104 | - 2,967 | - 277 | 188 | -105 |

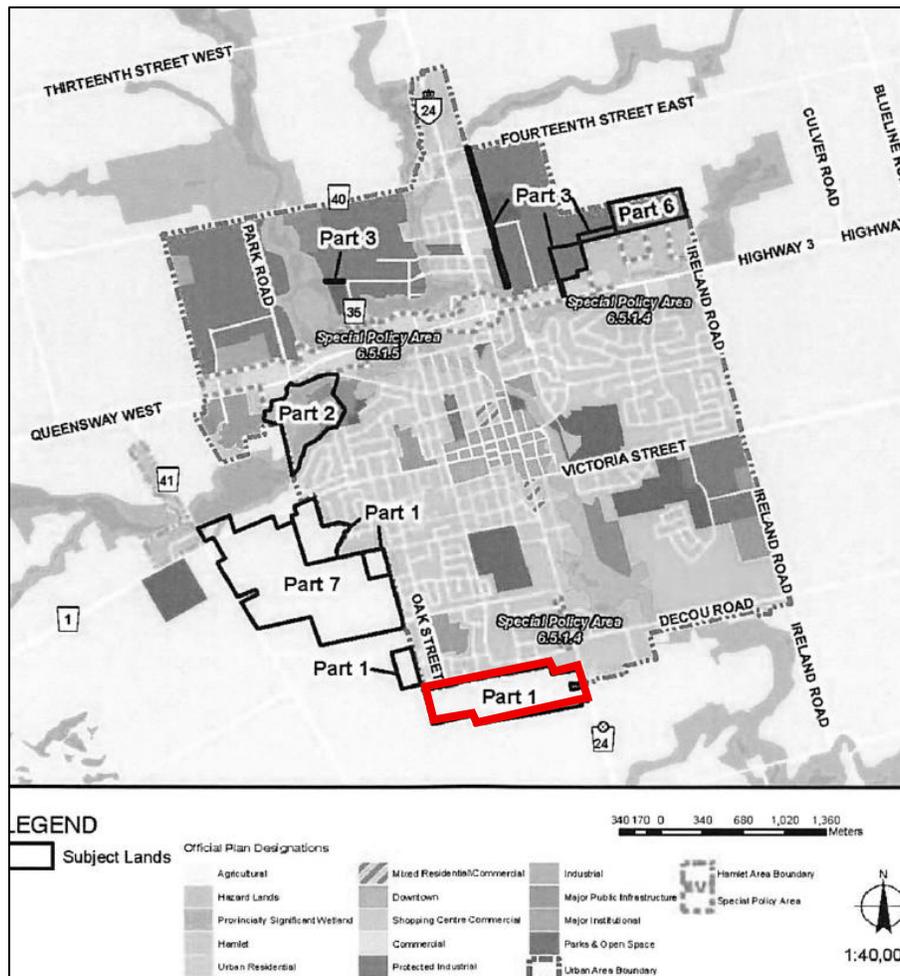
Site specific review of urban land needs in Simcoe

The following section provides a review for the withheld urban residential lands in Simcoe that can be further supported by staff. The lands include southern Part 1 in Simcoe as adopted in OPA 163 on May 22, 2024.

The area of interest is approximately 42 hectares and includes three parcels legally known as:

- WDH GORE PT LOT 10 RP 37R288 PT PART 7 PARTS 1 TO 6 & 8 TO 10 REG (Roll# 3310402010086000000)
- WDH CON GOR PT LOT 10 RP 37R8542 PART 4 (Roll# 3310402010047110000)
- GORE PT LOT 10 IRREG (Roll# 3310401016238000000)

Figure 1 Council-adopted southern Part 1



Surrounding lands include low density residential uses, agricultural, rural industrial, extractive industrial, and service commercial uses. The proposed expansion on the subject lands provides for continuous urban development and expansion of existing servicing infrastructure. The area of interest is predominantly classified as Class 4, which is not the most productive soil type for agricultural production on a range of 1 to 7 with Class 1 being the most productive soil class. Road access is provided from Norfolk Street South (arterial road). The area of interest is strategically located near main public transportation networks lines in Simcoe.

The subject lands are not within the Water Source Protection Plan sensitive areas, regulated areas under the *Conservation Authorities Act*, floodplains or provincially significant wetlands.

Staff report from the Special Council Meeting held on April 16, 2024, provides a detailed description of the former Staff methodology used for the evaluation of urban expansion requests which is provided in Attachment B. The evaluation criteria aim to leverage existing infrastructure capacity and communities' resources, while reducing impacts on prime agricultural lands. The report states that each property was screened to determine "*Heritage Designated Structures both on the site and on adjacent lands*" and that "*none existed on any of the sites*". A second evaluation focused on qualitative analysis was conducted by staff to factor in additional stakeholder feedback as part of the engagement process and the evaluation based on groups of parcels as opposed to individual parcels. The area of interest was evaluated by staff as part of the Growth study.

The evaluation matrix of the urban residential parcels of southern withheld Part 1 is in the attachments. The Growth Study evaluation of the area of interest provides a score of 30 for the western parcel (Roll 3310402010047110000) in Attachment C and a score of 40 for the eastern parcel (Roll 3310402010086000000) in Attachment D.

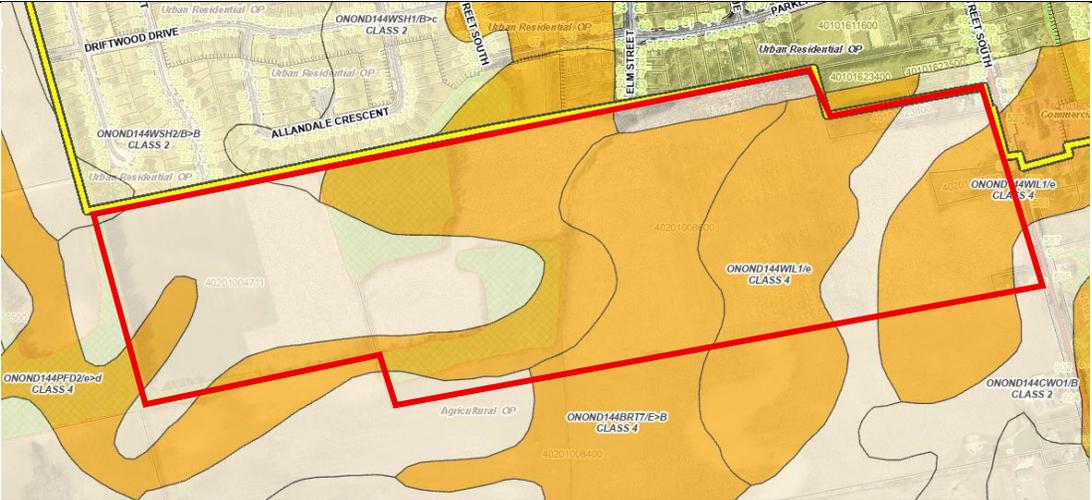
Table 1 provides a review of the withheld area of interest consistency with policy 2.3.2. of the PPS, 2024. Map 1 provides mapping of existing infrastructure, land use designations and natural heritage features in support of this policy review.

| | |
|---|---|
| <p>2.3.2 New Settlement Areas and Settlement Area Boundary Expansions</p> <p><i>1. In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:</i></p> <p><i>a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses.</i></p> | <p>A deficit of 95 hectares of urban residential lands was identified in Simcoe based on the updated high level land needs assessment. The area of interest is approximately 42 hectares in land area.</p> <p>A total of 1,870 new households need to be accommodated within the designated growth areas for a deficit of 105 hectares, referred to as Greenfield Units in Table 1.</p> |
| <p><i>b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;</i></p> | <p>Municipal water and wastewater servicing infrastructure is available within the urban settlement area of Simcoe.</p> <p>County Engineering staff have confirmed that Simcoe’s water supply capacity will require improvements by 2033. The current plan is to address this need with a water supply connection between Norfolk and Haldimand from the Nanticoke Water Treatment Plant, known as the Inter-Urban Water Supply system (IUWS). Design work is already well underway, however the final agreement between the two municipalities and funding remains unresolved. In September of 2025, Norfolk County instructed staff to examine alternative supply sources to meet these future needs in the event that the IUWS is not achievable. This decision is timely as there remains</p> |

| | |
|--|--|
| | <p>sufficient time to pivot from the IUWS should that be necessary. <i>IUWS is the County’s program to deliver water supply systems for long term growth.</i>¹</p> <p>The County’s engineering staff provided that Simcoe has sufficient water treatment capacity to meet our forecasted growth needs by 2050 horizon.</p> <p>Hence, water and wastewater servicing capacity in the short and medium term is adequate for the inclusion of the area of interest. Official Plan policy 8.9.1.c) currently states that “<i>All development in the Urban Areas shall be fully serviced by municipal piped water supply and waste water treatment systems.</i>”</p> <p>Municipal servicing infrastructure can be extended to service proposed development on the subject lands at the owner/proponent expense subject to applicable by-laws.</p> |
| <p><i>c) whether the applicable lands comprise specialty crop areas;</i></p> | <p>“<i>Specialty crop area</i>” means areas within the agricultural land base designated based on provincial guidance.</p> <p>No “Specialty Crop Area” designation has been defined within the County. No long-term investment in capital within the area of interest is noted for the cultivation of specialty crops.</p> |
| <p><i>d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority</i></p> | <p>Canada Land Inventory (CLI)² provides a classification of agricultural land capability classes with class 1 being the lands with the highest capability for agricultural land use activities and class 7 being the lands with the lowest capability.</p> <p>The area of interest is predominantly classified as Class 4, which is not the most productive soil type for agricultural production.</p> |

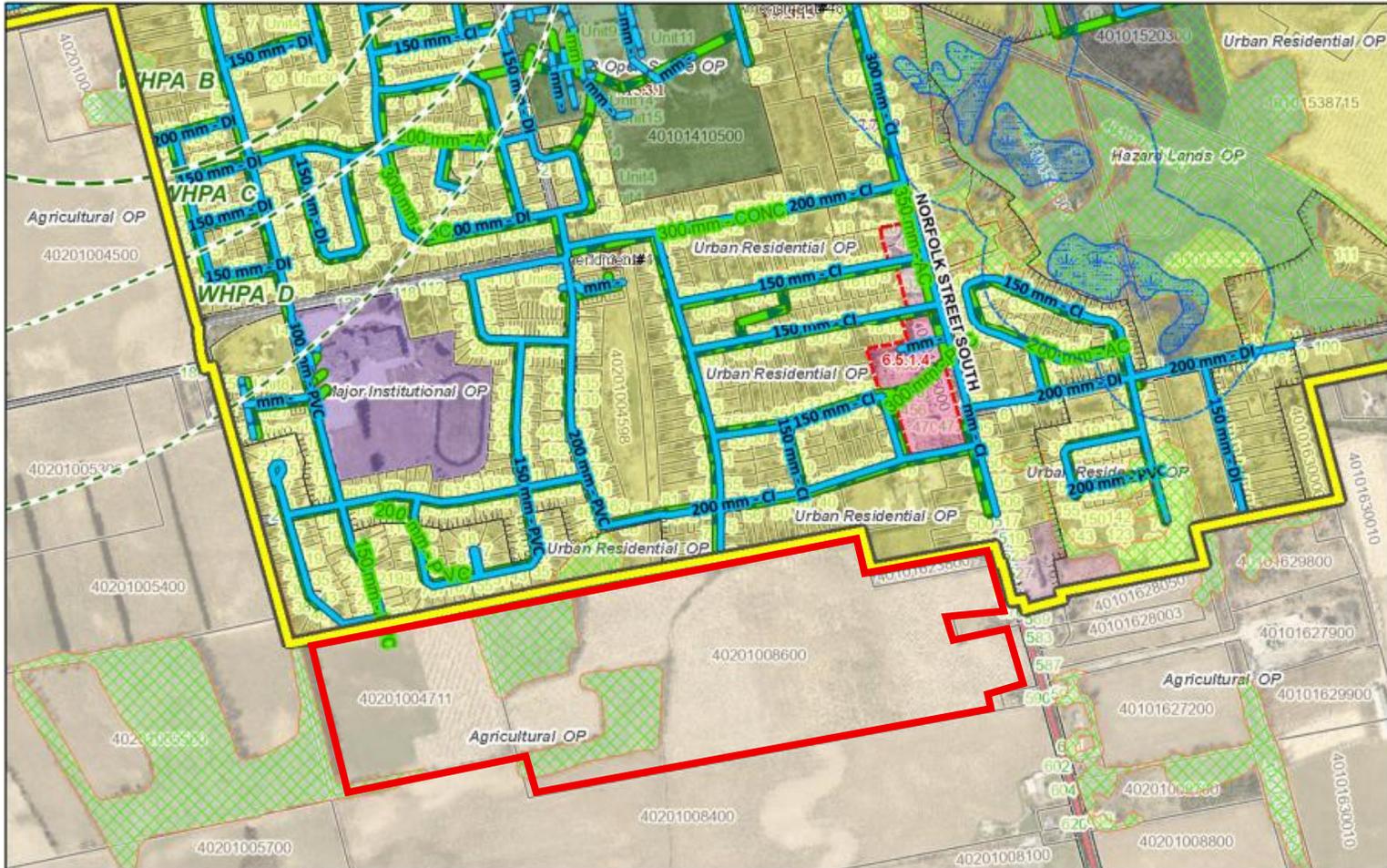
¹ *Inter-Urban water Supply | Norfolk County. (2025.). Norfolk County. <https://www.norfolkcounty.ca/home-property-and-neighbourhood/water-and-wastewater/inter-urban-water-supply/>*

² *Canada, A. a. A. (2024, July 24). CLI Agriculture classification. <https://sis.agr.gc.ca/cansis/nsdb/cli/classdesc.html>*

| | |
|---|--|
| <p><i>agricultural lands in prime agricultural areas;</i></p> |  |
| <p><i>e) whether the new or expanded settlement area complies with the minimum distance separation formulae;</i></p> | <p>Surrounding rural areas within 1000 metres include agricultural, rural industrial, extractive industrial, and service commercial uses.</p> <p>A livestock operation is located east of the subject lands within less than 410 metres on the lands known as 40101629900 and 40101630010. The boundary request provided in attachment E provides an assessment of the existing livestock activities and influence and provides that the urban boundary expansion complies with MDS I requirement.</p> |
| <p><i>f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and</i></p> | <p>The area of interest is predominantly Class 4 soil type which is not the most productive for agricultural production.</p> <p>Staff note that in comparison with other parcels abutting the settlement area boundary, these lands are the most suitable based on CLI soils classification and access to transportation infrastructure.</p> <p>Development on these lands provides for a continuous expansion of the built environment.</p> |

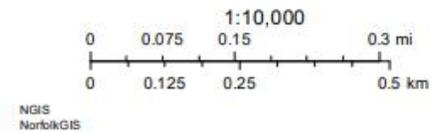
| | |
|--|---|
| <p><i>g) the new or expanded settlement area provides for the phased progression of urban development.</i></p> | <p>The proposed expansion on the subject lands provides for continuous urban expansion and coherent use with the existing development.</p> |
| <p><i>2. Notwithstanding policy 2.3.2.1.b), planning authorities may identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities to support development are planned or available.</i></p> | <p>Water/Wastewater and natural gas servicing infrastructure are located within the settlement area. Direct road access is provided from Norfolk Street South (arterial road). The area of interest is strategically located near main public transportation lines in Simcoe.</p> <p>The planning agent confirmed that a sanitary sewer hydraulic capacity analysis of the existing sewer system and a watermain hydraulic of the watermain system were conducted by an independent consultant. The technical assessments provide that the sanitary sewage from this site can be accommodated by the existing downstream sanitary sewers. The modeling analysis indicates that sufficient water pressure is available across the proposed development.</p> <p>Three licensed day cares, one public school and one Catholic high school are located less than 640 metres from the area of interest.</p> |

Map 1 Simcoe Southern Part 1 as adopted in OPA 163



10/10/2025, 10:27:42 AM

- | | | | |
|--------------------------------------|-----------------------------------|--------|----------------|
| Urban & Hamlet Boundaries | Resort Area Boundary | WHPA B | WHPA E |
| Urban Area Boundary | Well Head Protection Areas | WHPA C | MNR - ANSI |
| Hamlet Area Boundary | WHPA A | WHPA D | Adjacent Lands |



Norfolk GIS
© Norfolk County

A boundary request letter provided by a Registered Professional Planner (dated November 5, 2025) recommending the inclusion of the subject land is provided in Attachment E.

Public and Indigenous Engagement

Special Council Meeting's Staff report dated April 16, 2024, provides that engagement has been conducted throughout the study with various groups that included:

- Project Technical Internal Working Group
- Provincial and other Agencies
- Landowner/Development Industry Stakeholders
- Public
- Planning Advisory Committee

Special Council Meeting Staff report is provided in Attachment E for more information on public engagement.

We note that a deputation was made on April 16, 2024, for the lands that are being discussed in this memorandum known as Roll# 3310402010086000000, 3310402010047110000, 3310401016238000000.

Engagement and comment request letters were sent electronically to Mississauga of the Credit First Nation and Six Nations of the Grand River on December 22, 2025. The letters provided background information, site specific review of the lands adopted by Council and supported by staff for inclusion in the settlement area of Simcoe and an overview of final staff recommendations.

All comments were received by January 20, 2026, from both consulted nations. The comments outline that the withheld lands of southern Part 1 in Simcoe as adopted in OPA 163 are flagged for having an archeological potential which will require more advanced archeological assessment at the time of development.

Staff recommendations

- 1) Staff recommend the approval of the inclusion of the withheld southern Part 1 in Simcoe as adopted in OPA 163. In comparing the withheld urban residential land expansions OPA 163 in Simcoe, it can be confirmed that the area of interest includes the least productive agricultural lands located outside vulnerable areas of the Source Water Protection Plan.
- 2) Staff have provided a review of residential urban expansion based on the revised high-level residential land need with the understanding that the employment

lands need and designation will be reviewed as part of an Employment Land Strategy that was omitted from the initial Growth Study process. The Employment Land Strategy shall allow for land conversion to employment lands as defined in section 1(1) of the *Planning Act*.

- 3) The remaining withheld matters of OPA 163 are deemed inconsistent with the requirements of policy 2.3.2. of the PPS 2024 for “*New Settlement Areas and Settlement Area Boundary Expansions*”.

Attachments

The following attachments are provided in support of Staff recommendations:

- Attachment A – Peer Review of Updated Residential Lands Need
- Attachment B – Special Council Meeting Staff Report – April 16, 2024
- Attachment C – Growth Study Staff Evaluation – Roll 40201004711
- Attachment D – Growth Study Staff Evaluation – Roll 40201008600
- Attachment E – Request for Urban Boundary Expansion, Roll 40201004711 & 40201008600