

March 20, 2026

Our File No. 312513

By E-MailHonourable Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Flack:

**Re: Middlesex County Official Plan Amendment 4
ERO Number 026-0123
Ministry Reference Number 30-OP-269536**

Middlesex County Official Plan Amendment 4, which is now before the Minister for consideration, requires modification to ensure that it is consistent with the policies of the Provincial Planning Statement.

In particular, by underestimating the share of population growth in the regional market area, that will take place in Middlesex County itself, the amendment sets the growth levels at too low a level. The consequence will be that, if the policies are not modified, Middlesex County will make insufficient provision for future growth. The housing supply will be artificially constrained, and with insufficient housing supply, housing prices will escalate, harming the local and provincial economy.

Improbably, the work that forms the basis for the amendment's population projections provides for the County's share of the London-Middlesex population (the census division used in the Provincial projections) to actually decline over the next ten year period from its historic share. This runs contrary to all evidence and recent market patterns across Ontario.

In addition, Official Plan Amendment 4 includes affordable housing policies that are unrealistic, unachievable, and will in actual practice result in the delivery of less housing for families.

We act for Sifton Properties Limited. We are requesting that the proposed Middlesex County Official Plan Amendment 4 be modified to reflect a more realistic share of growth to help achieve Provincial Policy objectives for the delivery of a sufficient supply of housing. We are also requesting that the housing policies be modified to be made more realistic and achievable.

Specifically, we are requesting a modification that the population forecasts be corrected by replacing the adopted Appendix B, with the attached alternative Appendix B.

In adopted policy 2.3.3 Forecasting Growth, the third paragraph should be replaced with the following paragraph: “The Provincial Planning Statement permits a planning horizon of 20 to 30 years. Local municipal councils are required to utilize the 30 year planning horizon for their respective Official Plans to ensure that the County will have sufficient designated land. While the planning horizon is 30 years, the County’s forecasting will extend to 2076 to coordinate with infrastructure planning.”

Also in policy 2.3.3, the following should be added after the last paragraph: “It is the County’s policy that the population and housing projections are a guide and that the most important component is that projected housing is achieved within the horizon. Local municipalities are encouraged to review and reallocate the projections based on local circumstances and in consideration of the growth planned by other municipalities”

The proposed paragraph in adopted policy 2.3.5 General Policies that reads “Where full municipal services are planned or available, the use of private or communal wastewater treatment systems, including package treatment plants shall be prohibited. All development within new or expanded settlement areas shall be required to connect to the municipal wastewater and water system to ensure long-term servicing efficiency, environmental protection, and public health.”

should be modified to read:

“On lands where full municipal services are planned or available, the use of private or communal wastewater treatment systems, including package treatment plants shall be prohibited. All development within new or expanded settlement areas should connect to the municipal wastewater and water system where available and viable, to ensure long-term servicing efficiency, environmental protection, and public health.”

Policy 2.3.7 a) should be modified to read: “2.3.7 a) permit and facilitate an appropriate range and mix of housing options that meet the long-term needs of people of all incomes”.

Policy 2.3.7 e) should be modified to read: “2.3.7 e) require that intensification and redevelopment occur within Settlement Areas, where an appropriate level of physical services is or will be available in the immediate foreseeable future and subject to the policies of 2.3.6. Local municipalities are required to establish an intensification and redevelopment target which is expressed in a number of units by type to implement the projections in Appendix B and servicing availability.”

The portion of Policy 2.3.7 g) that reads as follows:

“for all residential developments of 10 or more units, proponents shall demonstrate how market-based housing needs including attainability and affordability have been addressed. In doing so, proponents shall:

- i) demonstrate how the proposed development contributes to a range and mix of housing options that support residents of varying income levels and life stages;
- ii) consider opportunities to incorporate affordable and attainable housing units within the development, consistent with the definitions and targets established by this plan; and
- iii) provide supporting documentation, such as a housing rationale or market needs assessment, to the satisfaction of the approval authority.”

should be replaced with the following:

“for all significant developments, proponents should aim to add to the municipality’s supply of a range and mix of housing options. Opportunities to meet market-based needs including housing attainability and affordability should be explored.”

The first and last paragraphs of policy 2.3.7.2 Number, Range and Mix of Housing Units, should be deleted. A new second paragraph should be added to policy 2.3.7.2 as follows: “The County and local municipalities shall prepare housing strategies that assess housing needs across the housing continuum and explore incentives and tools to achieve the delivery of affordable housing. Local municipalities shall set affordable housing targets informed by their housing strategies.”

Within adopted policy 2.3.8.1, Urban Areas, the sentence reading “Local municipalities shall adopt zoning standards that promote higher density within Urban Areas” should be deleted by modification.

Policy 3.2.2 b) should be deleted and the following should be added as a new paragraph at the end of Policy 3.2.2: “The Minimum Distance Separation Formulae do not apply to development within Settlement Areas”.

In the first paragraph of the adopted policy 4.4 Local Zoning By-laws, the words “minimum density targets for new or expanded Settlement Areas” should be deleted.

The requested modifications are supported by the attached planning opinion from Malone Given Parsons, and the Land Needs Assessment memorandum from Peter Norman, land economist.

In the event that the Minister is not prepared to make the requested modifications, we request the policies in question be referred to the Ontario Land Tribunal for a hearing pursuant to section 17 (55) of the *Planning Act*.

Proposed Policies in 2.3.3 Forecasting Growth Fall Short of Meeting Provincial Ambitions to Increase Housing Supply - Policy Actually Provides for Middlesex County to Have a Reduced Share of London-Middlesex Population!

The proposed appendix B, which is referenced in proposed policy 2.3.3 Forecasting Growth, establishes the population and housing forecasts for the County and its constituent local municipalities. Simply put, these numbers are too low, and result in artificially low assumptions for determining land needs for housing. If they come into effect, the result will be a shortfall of housing throughout the period of the plan.

Surprisingly, the work that is incorporated into these population projections provides for the County's share of the London-Middlesex population (the census division used in the projections) to decline over the next ten year period from its historic share. This means that the County's share of growth will be even more significantly lower than the share of growth experienced in the past - with an increasing share of the growth allocated to London.

This assumption is contrary to the observation of the County's consultants Watson that "continued outward growth pressure from the City of London and G.G.H. will continue to represent the largest driver of population growth for Middlesex County".

The policy assumption of a declining share of growth and population in the County runs counter to the province-wide trend since 2006 of growth increasingly moving towards the periphery and away from larger urban centres. As Watson observes, "The share of population growth outside the Greater Toronto and Hamilton Area (G.T.H.A.) steadily increased over the past three census periods, 2006 to 2021." They note that the peripheral share of growth over that time rose from 12% up to 33%.

They also note that Middlesex County has experienced sharply increased net in migration in recent years.

In that context, their projection that the County's share of London-Middlesex population and growth will both decline in the near future seems misplaced.

In addition, the tables in the adopted Appendix B are unusually and unnecessarily detailed. They were developed as background work to establish forecasts - it is not appropriate to include that level of detail in the Official Plan growth forecast required by the Provincial Planning Statement. The level of detail shown, including many growth increments, and different varying figures for persons per unit would make it highly unlikely that a municipality will grow exactly in conformity with all the elements of the Tables. As such, the forecasts in Appendix B should be significantly simplified.

In contrast, Norman Strategis, commissioned by Sifton, has done population projections that demonstrate more realistic growth assumptions based upon the Provincial population projections and demonstrated trends. Those numbers would be more appropriately adopted by Middlesex County to accurately reflect realistic growth assumptions that will help to accommodate the needs of current and future residents.

Another concern is the change from a 25 year planning horizon in the current Official Plan to a 20-30 year horizon (at the local municipality's option). Already, we have seen an indication at the local municipal level of an intention to adopt the low end of the range for their land needs work. When combined with the observations about the near term low forecasts in population growth noted above, this will surely result an inadequate supply of housing - and a commensurate shortfall in planning for infrastructure and services.

We recommend the adoption of a clear 30 year horizon - consistent with the latest Provincial population projections. We observe that Appendix B does show the 2056 (30 year) numbers. That horizon should be adopted for all growth planning.

Proposed Policy 2.3.7 Respecting Apartment Housing is Unreasonably Prescriptive and Unrealistic in its Requirements

The proposed housing policies in 2.3.7 result in a requirement that 25% of all new housing units be in the form of multiple units or apartment dwellings. This is a very high figure and will not be realistically achievable. At the time of the last census (2021), apartment units made up only 7% of the total mix of housing units in Middlesex County. Intensification in apartments in the regional market area is likely to take place in London. Those seeking apartment living will not be looking to locate in the rural or small town communities found throughout Middlesex County.

Even in the Watson background work for Middlesex OPA 4, which is very ambitious in forecasting strong apartment growth, the share of apartments in the County's future growth never reaches the levels suggested by policy 2.3.7. Simply put, the targets in policy 2.3.7 a) are unrealistic and unachievable.

By seeking "too much", the likeliest outcome is that new housing will simply not be built because the proposed thresholds are so high as to render new housing construction unviable. The current slowdown in housing starts amply demonstrates how fragile the line is that, when crossed, shuts down all housing construction. The high level of development charges, when combined with high interest rates, a sustained decline in per capita GDP, and increased labour and material costs in construction have been sufficient together to bring housing starts to a crawl. Adding the additional hurdle of unrealistically high affordable housing requirements will only worsen the supply crisis by further rendering new housing projects to be economically non-viable.

Ironically, this proposed policy to encourage affordability will in practice have the opposite effect - discouraging housing starts, thus limiting housing supply and further driving up the prices of the limited existing housing stock.

The same concerns relate to the policy requirements that 10% of new units be Affordable Rental Housing, that 10% be purpose-built rental, and that 15% be Affordable and Attainable Ownership Housing.

It is not clear whether this policy is intended to apply at a development project level or at a municipal level. However, proposed policy 2.3.7 g) implies that it will be applied to each development including 10 or more residential units. This particular policy also represents an additional item of red-tape, another report, further complicating and slowing a planning approval process that is sorely in need of simplification. The Province has clearly indicated a need to simplify and streamline housing approvals to help deliver badly needed housing supply. This proposed additional process requirement runs directly opposite to the well-articulated Provincial policy priority to streamline approvals and cut excessive red tape.

The most significant way to work towards more affordable housing is to increase supply. Proposed policy 2.3.7 will have exactly the opposite effect, and will limit the supply of housing.

In a related vein, policy 2.3.7 e) requires 15% of all development to be by way of intensification and redevelopment. This policy certainly seems out of place in a housing policy - and seems more appropriate to an urban structure policy. That being said, the policy is more sensibly articulated as a goal or target - not something that “the County requires”.

How this would be enforced if it is a requirement is both puzzling and concerning. Landowners cannot be compelled to redevelop at higher densities within urban areas unless it makes sense to them. The policy should not become a lever to restrain the delivery of new housing in new settlement areas based upon an unmet requirement elsewhere that 15% of “all development occur by way of intensification and redevelopment.”

While these policies are well-intentioned, if actually applied, they are more likely to block the construction of housing projects that fail to achieve the prescribed targets - targets which are simply not achievable without significant subsidies from the taxpayer - none of which are available. As a result, if these housing policies are approved as adopted, and attempted to be applied, they will simply block the delivery of any new housing supply, as it will be impossible for any proposed housing to satisfy the targets in the policy.

Proposed Policy 2.3.5 Unnecessarily Prohibits Innovative, Low Cost and Efficient Servicing Options

Proposed policy in 2.3.5 includes a requirement that “Where full municipal services are planned or available, the use of private or communal wastewater treatment systems, including package treatment plants, shall be prohibited. All development within new or expanded settlement areas shall be required to connect to the municipal wastewater and water system to ensure long-term servicing efficiency, environmental protection, and public health.”

In a municipality as diverse, and as full of different communities with different attributes like Middlesex County, this policy is unduly restrictive.

The County already has many communities which successfully include private or communal systems. It may make sense, in many communities, to consider such approaches on either an interim or permanent basis. Full municipal services with traditional treatment facilities characteristic of highly urban areas can be very costly, and represent an undue burden on taxpayers in a municipality with the geographic attributes of Middlesex County.

This proposed policy should be amended to be less proscriptive. It may make sense to “prefer” full municipal services where appropriate and cost efficient - but that should not extend to a prohibition on other innovative and potentially more cost-efficient, safe servicing solutions. The policy should be amended to restore flexibility.

It is worth observing that recent changes to servicing policies in Provincial Policy have included a move towards allowing more flexibility in servicing solutions. The County should follow this Provincial policy move and build more flexibility into these servicing policies.

Requirement for Housing Standards That Promote High Density Creates Uncertainty, and Could Lead to Requirements for Apartment Development in Inappropriate Locations

A portion of Policy 2.3.8.1 requires that “Local municipalities shall adopt housing standards that promote higher density within Urban Areas”. There are a number of concerns with this proposed policy.

We foresee that this could lead to unreasonable requirements from municipalities to plan for apartments for which there is no foreseeable market demand. “Urban Areas” include Dorchester, Ilderton, Mount Brydges, among others - and Dorchester and Thorndale are to be elevated from the Community Areas list to the Urban Areas list. Will a policy like this require that new settlement areas include high density housing? These new settlement areas are naturally on the periphery of the Urban Areas and are potentially unsuited due to distance for the Urban Area centre concentrations of services and public infrastructure, to accommodate high density housing.

It also raises a question of vagueness. What does “higher density” mean? High density, as in apartments? Higher than what?

In a similar vein, the 4.4 policy requires local municipalities to establish “minimum density targets for new or expanded Settlement Areas” in their zoning may be problematic - especially outside the context of specific development applications. That seems more a matter more appropriately addressed in an official plan, as policy targets overall, rather than as a zoning matter.

Conclusion - Sifton Is Concerned With Several Proposed Policies

Sifton is concerned that a number of the policies proposed in Middlesex County Official Plan Amendment 4 will have the consequence of reducing housing supply and increasing housing costs, notwithstanding their stated goals. Unintended consequences are a common feature of planning in the current era. The impact of the Growth Plan in creating Ontario's severe housing crisis was so dramatic that the new proposed Provincial Projection Methodology features a corrective step to address "suppressed demand" - which means unfulfilled demand for homes caused by the supply-limiting effects of the previous Provincial policy.

Key to avoiding such unintended consequences of well-intentioned policy is meaningful engagement with the people who build the homes, and understand the impact of policies on their efforts - people like Sifton.

We ask that the Province make the following proposed modifications to Middlesex County Official Plan Amendment 4, as adopted:

Specifically, we are requesting a modification that the population forecasts be corrected by replacing the adopted Appendix B, with the attached alternative Appendix B.

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In the event that the Minister is not prepared to make the requested modifications, we request the policies in question be referred to the Ontario Land Tribunal for a hearing pursuant to section 17 (55) of the *Planning Act*.

We would appreciate an opportunity to discuss this submission further.

Yours truly,

AIRD & BERLIS LLP



Hon. Peter Van Loan, P.C., K.C.
Partner

Encl. Replacement Appendix B for modification

- c. dellarue.howard@ontario.ca (Community Planning - Municipal Services West)
- robert.dodd@ontario.ca (Chief of Staff)
- lindsay.smith3@ontario.ca (Deputy Director Policy)
- josef.filipowicz@ontario.ca (Executive Director - Policy)
- curran.hanchar@ontario.ca (Senior Policy Advisor)

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Amended Housing and Population Table for Appendix B of OPA 4

Middlesex County Population and Housing Forecast

Year	Population (including undercount)	Census Population	Households					Total
			LDU	MDU	HDU	Other		
2021	Middlesex County	81,250	77,800	25,720	710	2,070	935	29,435
	Village of Newbury	500	400	180	10	20	0	210
	Municipality of Southwest Middlesex	6,125	5,860	2,120	30	185	70	2,405
	Municipality of Strathroy-Caradoc	24,840	23,880	7,510	355	1,275	315	9,455
	Municipality of Thames Centre	14,530	13,970	4,735	115	185	145	5,180
	Municipality of Middlesex Centre	19,695	18,925	6,165	200	130	200	6,695
	Municipality of North Middlesex	6,550	6,325	2,175	0	160	55	2,390
	Municipality of Adelaide Metcalfe	3,100	3,000	1,010	0	10	10	1,030
Municipality of Lucan Biddulph	5,900	5,700	1,910	70	140	10	2,130	
2056	Middlesex County	162,295	152,990	53,710	4,015	4,870	695	63,290
	Village of Newbury	800	650	290	10	10	0	310
	Municipality of Southwest Middlesex	8,260	7,900	3,075	165	265	65	3,575
	Municipality of Strathroy-Caradoc	47,885	46,040	16,035	1,370	2,350	270	20,020
	Municipality of Thames Centre	33,520	32,230	11,305	975	590	170	13,045
	Municipality of Middlesex Centre	48,905	46,990	15,435	1,290	1,275	70	18,065
	Municipality of North Middlesex	7,245	6,995	2,600	25	225	40	2,890
	Municipality of Adelaide Metcalfe	4,720	3,680	1,650	0	0	40	1,530
Municipality of Lucan Biddulph	10,960	8,500	3,320	190	150	40	3,860	