

March 20, 2026

MGP File: 24-3379

Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON M7A 2J3

**Attention: Honourable Rob Flack
Minister of Municipal Affairs and Housing**

Dear Minister Flack:

**RE: Middlesex County Official Plan Amendment 4 Comment Letter
ERO number 026-0123
Ministry Reference Number 30-OP-269536**

1.0 Introduction

Malone Given Parsons Ltd. are the land use planners representing Sifton Properties Limited (“Sifton”). On behalf of Sifton, we have reviewed Official Plan Amendment (“OPA”) 4 to Middlesex County’s Official Plan which was adopted on January 13th, 2026.

Comments on OPA 4 were submitted to Middlesex County by Aird & Berlis on behalf of Sifton earlier in the process. These comments were not addressed by the County. As OPA 4 is now before the Minister for approval, we have summarized our comments on the adopted OPA 4 in the following letter.

In summary, we respectfully request that:

- The planning horizon in Policy 2.3.3 be 30 years for all municipalities within Middlesex County;
- The language in Policy 2.3.3 identifying the forecasts as a guideline be added back to the Official Plan;
- Language be added to Policy 2.3.3 to clarify that achievement of the projections is critical and to further encourage the redistribution of growth amongst the local municipalities to ensure the achievement of the projections at a County-wide scale;
- Appendix B be simplified using the version prepared by Peter Norman;
- Policy 2.3.7 be modified by removing the housing targets and adding language directing local municipalities to establish appropriate targets;
- Policy 2.3.5 require connection to municipal systems only where available and viable;
- Policies 2.3.8.1 and 4.4 be removed; and,
- Section 3.2.2 be modified to state that the Minimum Distance Separation Formulae do not apply to development within Settlement Areas.

2.0 Comments

2.1 Planning Horizon

Policy 2.3.3 permits lower-tier municipalities to determine their own planning horizon within a 20–30-year timeframe. Policy 2.1.3 of the Provincial Planning Statement (“PPS”) requires land to be made available to meet the projected needs for a time horizon of 20-30 years. Policy 2.1.4 requires that municipalities maintain at all times the ability to accommodate lands that are designated and available for residential development for 15 years within the regional market area.

The County has not reviewed the land supply in local municipalities to account for local circumstances; there are many lands that cannot proceed to development in the mid-term horizon as a result of a number of local circumstances, not least of which is the availability of servicing infrastructure. To ensure that the County continues to comply with the PPS, it should require that municipalities designate 30 years of supply to allow for 8-10 years of lower-tier infrastructure and land use planning. This will ensure that the County will meet the minimum 20 years of designated land and maintain at all times a 15-year supply of residential development land until the next County Official Plan review.

With regard to forecasting, infrastructure planning typically extends beyond a 30-year horizon, and in order to engage in effective long-range planning, longer planning horizons should be used to match infrastructure planning. A minimum of 30 years is required to achieve this, although 50 years is more typical for infrastructure planning. To enable this longer horizon perspective, the County should forecast out to 2076 for infrastructure purposes, which, coupled with the policies above, ensures that long-term planning is occurring to allow for the mid and short-term planning decisions to be in place.

Additionally, coordinated planning across the County will be challenging if there is a range of planning horizons amongst the lower-tier municipalities. Local municipalities using different horizons are particularly challenging in ensuring the County is consistent with the PPS across the entire regional market area. Moreover, the retention of Policy 2.3.3, which permits lower-tier municipalities to accommodate growth from other municipalities that cannot absorb the population projections, will become complicated and difficult to assess with multiple horizons across each municipality.

2.2 Forecasting Growth

OPA 4 proposes to remove language from Policy 2.3.3 stating that the projections in Appendix B should be used as a guideline for future growth and development. It is our opinion that this language should not only be retained in the Official Plan, but also strengthened.

Policy 2.3.3 also states separately that “[i]t is the intention of this Plan to use the population projections presented in Appendix B as a guide to the County’s future growth and development. If over the planning period, a local municipality cannot absorb the population projections outlined, nothing in this Plan shall restrict other municipalities from accommodating that growth, provided the appropriate services can be provided”.

We support this language as it provides flexibility while supporting the achievement of the projections within the umbrella of the County. We request that an additional sentence be added stating that “[i]t is the County’s policy that the population and housing projections are a guide and that the most important component is that the 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 local municipalities”.

2.2.1 Appendix B

OPA 4’s Appendix B is too detailed to be included in an Official Plan, particularly when this is a guideline only for lower-tier municipalities and given that local circumstances have not been assessed in determining the forecasts. We suggest that the forecast be simplified to 30+-year population and employment forecast for each lower-tier municipality, simply expressed in the people and jobs forecasted to 2056 and beyond. Official Plans are intended to be permissive rather than restrictive and including this level of detail is unnecessarily restrictive. Providing a simple population projection table will provide greater flexibility and support the achievement of the projections.

Appendix B should be replaced by the version prepared by Mr. Norman. Mr. Norman’s version of Appendix B reflects reasonable market dynamics and a housing mix that is consistent with the demographic structure of future population growth, producing a more appropriate assessment of housing need. All that is required for the purposes of the Official Plan are the total population and units by type for residential projections and jobs by type for employment projections.

Further to the above, the first paragraph of Policy 2.3.7.2 references person per unit levels and other details related to Appendix B. This paragraph should be deleted as it provides unnecessary details relating to the projections.

2.3 Housing Policies

2.3.1 Affordability Targets

Policy 2.3.7 a) establishes targets for Affordable Rental Housing, Affordable and Attainable Ownership Housing, and purpose-built rental units. Policy 2.3.7.2 states that local municipalities must adopt affordable housing targets that are consistent with, or greater than, the County’s targets.

The PPS requires planning authorities to provide for an appropriate range and mix of housing options and densities to meet the projected needs of current and future residents of the regional market area by establishing and implementing minimum targets for affordable housing (Policy 2.2.1 a).

There should not be development requirements at the upper-tier level, and affordable housing targets should not be established without examining how and where to provide affordable housing. The County and lower-tier municipalities should be required to develop housing strategies that explore incentives and tools, and ways to work with the development

community to deliver affordable housing. Local municipalities should be required to set affordable housing targets informed by their housing strategies.

As such, we request that Policy 2.3.7 a) be replaced with the following: “permit and facilitate an appropriate range and mix of housing options that meet the long-term needs of people of all incomes”.

We further request that the last paragraph of Policy 2.3.7.2 be deleted and a new second paragraph be added to Policy 2.3.7.2 that reads 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”.

Given the above, we also request that Policy 2.3.7 g), which requires proponents to demonstrate how market-based housing needs, including attainability and affordability, have been addressed, 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”.

2.3.2 Multiple Units and Apartment Dwellings Target

Policy 2.3.7 (a) establishes a target of 25% of new housing units to be in the form of multiple-unit or apartment dwellings. While the County may expect this level of apartment growth based on current forecasts, not every lower-tier municipality can or should provide this level of apartment growth.

Forecasts can change, and forecasts at the County level do not take local circumstances and servicing into account. Further, not all locations are appropriate for the provision of higher-density units like multiple units and apartment dwellings.

As such, we are requesting the removal of the multiple units and apartment dwellings policy target.

2.3.3 Intensification and Redevelopment Target

Policy 2.3.7 e) establishes a target of 15% of development to occur through intensification and redevelopment.

Policy 2.3.1.4 of the PPS states that “[p]lanning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions”. The proper analysis has not been done to determine the appropriate level of intensification within Middlesex County, particularly with consideration of local conditions. As such, Policy 2.3.7 e) is inappropriate. In accordance with the PPS, the County should not set an intensification target; instead, it should direct the local municipalities to set their own intensification targets.

To ensure the lower-tier intensification targets are realistic, they should be informed by the projections and identify a minimum intensification target of units by type rather than a

percentage of overall units. Setting targets based on the forecasted need for housing will support the achievement of these targets, based on the delivery of the forecasted housing types, not an arbitrary policy target. The intensification targets should have the effect of achieving the forecasted housing needs within built-up areas, not of altering the housing mix through policy.

We request that Policy 2.3.7 e) as proposed by OPA 4 be deleted and replaced with the following:

“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 Section 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.”

2.4 Servicing

Policy 2.3.5 requires development within new or expanded settlement areas to connect to municipal wastewater and water systems. However, there are settlement areas within Middlesex County that do not have servicing capacity, or municipal servicing is not financially viable. We request that this policy be revised to require connection to municipal systems where available and viable to ensure that appropriate development is not prohibited where municipalities are not providing sufficient servicing capacity to support development.

2.5 Direction for Zoning By-laws

Policy 2.3.8.1 requires that local municipalities adopt housing standards that promote higher density within Urban Areas.

There are a range of communities within the Urban Areas in Middlesex County. Higher density forms of housing may not be appropriate in all of them. Given that the County and the local municipalities have not prepared housing strategies to determine the appropriate need for higher density uses, the County should not be directing local municipalities to adopt zoning standards that promote higher density in all Urban Areas. Local municipalities should determine the appropriateness of these types of zoning standards based on the results of their housing strategies and demonstrated demand for higher density housing.

Policy 4.4 requires zoning by-laws to include minimum density targets for new or expanded Settlement Areas.

Zoning by-laws control the use of land and set out standards for the development of buildings and structures. While zoning by-laws often include provisions on minimum and maximum building density, including density targets within a zoning by-law is generally not appropriate, particularly when required in an Official Plan.

Minimum density targets are an official plan policy tool that encourages a minimum density across a particular area. Official plans are intended to provide a vision for the municipality and higher-level land-use policies. Minimum density targets support the vision and provide a policy framework to implement on a site-by-site basis through the zoning by-law.

Policy 4.4 is inappropriate, and we request that the reference to “minimum density targets for new or expanded Settlement Areas” be deleted.

2.6 Minimum Distance Separation Policy

Section 3.2.2 states that “Infilling, rounding-out or minor extensions of existing development in Settlement Areas may be permitted provided that there is no major expansion of the outer limits of existing development as identified in the local official plan and subject to the development complying with the Minimum Distance Separation Formulae...”.

In our opinion, it is inappropriate for development within a Settlement Area to be required to comply with the Minimum Distance Separation Formulae. We are requesting that Policy 3.2.2 b) be removed and language be added to the end of Policy 3.2.2 stating that “The Minimum Distance Separation Formulae do not apply to development within Settlement Areas”.

3.0 Conclusion

It is my opinion that OPA 4, as adopted, will impede the delivery of an appropriate amount and mix of housing in Middlesex County and should be modified as outlined in this letter to reflect local conditions and ensure the projections can be achieved.

Yours very truly,
Malone Given Parsons Ltd.



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