

March 20, 2026

Memorandum to: Minister of Municipal Affairs and Housing

From: Peter Norman, MA, PLE, MLAI  
Norman Economic Strategies Inc.

**Subject:** Middlesex County Official Plan Amendment No. 4 Comment Letter  
ERO number 026-0123  
Ministry Reference Number 30-OP-269536

**Our File:** **P-8000.01**

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My name is Peter Norman. I am an economist by training and currently serve as founder and principal at Norman Economic Strategies. I have previously served as vice president and economic strategist at Altus Group and vice president at Clayton Research. In my profession practice over the past three decades, I have been qualified to deliver expert witness testimony before the Ontario Land Tribunal and its predecessors on numerous occasions, including matters related to urban growth projections, housing need assessments, and municipal land needs. I own and maintain a Potential Housing Demand model and have used it to managed hundreds of housing demand and land needs consulting assignments for both private and public sector clients across Ontario and Canada.

I appreciate the opportunity to provide feedback through ERO number 026-0123.

I have been retained by Sifton Properties Limited to provide economic advisory services. On behalf of Sifton, I have reviewed Official Plan Amendment No. 4 (“OPA 4”), which has been submitted to the Minister and is currently posted for public comment. My comments are provided through the Environmental Registry of Ontario (ERO) and focus specifically on the population and housing forecasts presented in Appendix B, which underpin the growth management policies within the document.

In forming my opinion, I have reviewed Appendix B in conjunction with the County’s April 2025 “Growth Analysis Update” document in detail, including the underlying assumptions related to population growth, household formation, and housing mix. Based on this review, it is my opinion that the forecasts presented are not consistent with provincial policy direction, including the Provincial Planning Statement, 2024 (“PPS 2024”), nor do they appropriately reflect the Ministry of Finance (MOF) 2024 population projections, which are the prescribed basis for such analyses.

## **Findings and Professional Opinion**

There are two principal and interrelated issues with the projections in Appendix B:

### ***1. Underestimation of Middlesex County’s Share of Growth***

The first issue is that the allocation of household growth to Middlesex County within the broader Middlesex Census Division is understated.

The OPA 4 projections effectively hold the County's share of growth constant at approximately its 2021 level (about 15% of household growth over the 2021–2056 period). It's of note that the pattern includes a decrease in Middlesex County's share of growth in the first half of the forecast reversing in the second half for no change overall. This assumption implies no structural shift in household location preferences over time. In my opinion, this is not a reasonable assumption.

Established urban economic theory and observed market dynamics would suggest that Middlesex County's share of growth should increase gradually over the forecast horizon, not remain static. This reflects:

- Increasing land constraints within the City of London;
- Relative affordability advantages in Middlesex County;
- Lower land and development costs;
- Shifting hybrid work practices;
- Greater availability of greenfield development opportunities; and
- Ongoing preferences among households, particularly family-forming households, for ground-oriented housing in lower-density environments.

These dynamics are well understood and form part of standard housing market analysis. Indeed, to properly follow Provincial guidance on this matter requires adherence to the principles in the Provinces Projection Methodology Guideline 1995 (PMG) which states that housing demand within a census division must be evaluated across the full housing market area, with distribution influenced by demographic structure and market choice.

By holding the County's share constant, the OPA 4 projections fail to capture these structural trends. In my opinion, this results in a systematic under-allocation of growth to Middlesex County and, correspondingly, an underestimation of housing need within its constituent municipalities.

## ***2. Inappropriate Housing Mix Relative to Demographic Drivers***

The second issue is that the projected housing mix in Appendix B is not aligned with the demographic profile of future population growth as set out in the MOF 2024 projections.

PPS 2024 requires that housing need be evaluated using the Provincial guidance set out in the PMG. The PMG provides a demographic-based methodology, including:

- Population growth by age cohort;
- Age-specific headship rates; and
- Age-specific propensities for dwelling type.

This methodology, consistent with long-established provincial guidance, recognizes that housing demand varies materially by age group. Housing requirements are appropriately derived through the application of age-based headship and dwelling type propensities.

### **Key Demographic Trends (MOF 2024)**

The MOF 2024 projections for the Middlesex Census Division indicate the following:



- A stable share of growth in the 20–29 cohort (at 15% of total adult population), consistent with historical patterns<sup>1</sup>;
- A significant decline in the share of growth in the 55+ cohort, from approximately 73% historically to approximately 40% going forward; and
- A substantial increase in the share of growth among the 30–54 cohort, rising from approximately 13% historically to approximately 46% in the forecast period (an almost 4-fold increase).

These shifts have direct implications for housing demand:

- Growth in the 20–29 and 55+ cohorts taken together is more strongly associated with higher-density housing;
- Growth in the 30–54 cohort is strongly associated with low- and medium-density housing, including single-detached, semi-detached and townhouse forms.

Taken together, these projections indicate a material shift in demand toward ground-oriented housing forms over the forecast period.

### **Inconsistency in OPA 4 Housing Mix**

The housing mix in Appendix B does not reflect these demographic drivers.

Specifically:

- OPA 4 projects that 83% of Middlesex County household growth will be in low- and medium-density housing, which is well below the 2021 Census level of approximately 88%;
- When combined with the City of London’s approved housing mix, the implied result is that only approximately 60% of total Census Division housing demand through the planning period will be low- and medium-density;
- This represents a decline of approximately 10 percentage points from the 2021 level (70%), despite a demographic shift that would reasonably suggest an increase in demand for these housing forms.

In my opinion, this is fundamentally inconsistent with the MOF 2024 projections. At a time when population growth is increasingly concentrated in the 30–55 age cohort (the primary driver of ground-oriented housing demand) the OPA 4 projections instead reduce the planned supply of these housing types.

### **Policy Implications**

This misalignment has direct and material planning implications.

Under PPS 2024, municipalities are required to:

- Plan for an appropriate range and mix of housing types; and

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<sup>1</sup> Historical patterns are measuring share of growth in the 20 years leading up to 2021



- Ensure sufficient land is available to accommodate projected needs over a 20–30 year horizon.

Low- and medium-density housing forms require greater land per unit than high-density forms. As such, under-planning for these housing types results directly in:

- An underestimation of land need;
- Insufficient designated greenfield land supply;
- A structural housing shortage over the forecast period;
- Upward pressure on housing prices; and
- Continued deterioration in housing affordability.

In my opinion, the housing projections in Appendix B do not satisfy the requirements of PPS 2024 and therefore do not provide an appropriate basis for long-term land use planning.

## **Conclusion and Recommendation**

In summary:

1. The allocation of growth to Middlesex County is understated and does not reflect reasonable market dynamics;
2. The housing mix is inconsistent with the demographic structure of future population growth as set out in MOF 2024 projections;
3. As a result, the projections fail to conform to PPS 2024 policy direction; and
4. The forecasts, if relied upon, would lead to insufficient land supply and adverse affordability outcomes.

I have undertaken an alternative housing needs analysis for Middlesex County and its constituent municipalities, applying:

- MOF 2024 population projections;
- PPS 2024 policy direction;
- The established demographic-based projection methodology; and
- Empirically grounded housing propensities.

This analysis produces a materially different and, in my opinion, more appropriate assessment of housing need.

Accordingly, I respectfully request that the Minister, in reviewing OPA 4, consider substituting revised housing need findings into Appendix B in place of the current projections.

Attached to this memorandum I have included Annex I, which is the full array of population and housing forecasts for Middlesex County and its constituent municipalities that I have prepared, and presented in a format similar to the data found in OPA 4 Appendix B. This is for your review.

I am also including for your consideration Annex II, which is a single table that should be used to replace all of the population and housing data currently in OPA 4 Appendix B. This single table provides the



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updated forecast numbers that I submit are more appropriate for approval. It also removes considerable detail that is not appropriate in an Official Plan.

I have not undertaken a review of the employment data presented in Appendix B, however, it is my opinion that those data also are too detailed to be appropriate for an Official Plan. I do not have an opinion on whether the data need revision, but they should be simplified to reflect just total employment in 2021 and 2056 for the purposes of Appendix B and not show all the details by type and intervening years.

Further, I would be pleased to meet with Ministry staff to discuss the details of my alternative population and housing projections for Middlesex County and its constituent municipalities.



# ANNEX I



## Middlesex County Population and Housing Forecast

Year	Population (including undercount)	Census Population	Households					
			LDU	MDU	HDU	Other	Total	
History	2001	69,080	66,600	20,960	325	1,480	400	23,165
	2006	71,505	69,100	21,980	365	1,500	705	24,550
	2011	72,630	70,800	23,115	490	1,590	640	25,835
	2016	73,630	71,500	24,085	465	1,685	650	26,885
	2021	81,250	77,800	25,720	710	2,070	935	29,435
Forecast	2026	90,835	86,305	28,260	1,305	2,155	645	32,370
	2031	95,350	88,380	33,165	1,785	3,025	705	38,675
	2036	117,400	109,240	37,560	2,235	3,420	705	43,920
	2041	134,820	125,880	42,205	2,740	3,835	725	49,500
	2046	146,515	137,325	46,905	3,310	4,260	775	55,250
	2051	153,815	144,635	50,545	3,625	4,550	625	59,350
	2056	162,295	152,990	53,710	4,015	4,870	695	63,290
Historic Growth	2001 to 2006	2,430	2,500	1,020	40	20	305	1,385
	2006 to 2011	1,125	1,700	1,135	125	90	-65	1,285
	2011 to 2016	1,000	700	970	-25	95	10	1,050
	2016 to 2021	7,620	6,300	1,635	245	385	285	2,550
Forecast Growth	2021 to 2026	9,585	8,505	2,540	595	85	-290	2,935
	2026 to 2031	4,510	2,075	4,905	475	870	60	6,305
	2031 to 2036	22,050	20,860	4,395	450	395	0	5,245
	2036 to 2041	17,420	16,640	4,645	505	410	20	5,585
	2041 to 2046	11,695	11,445	4,705	570	430	50	5,750
	2046 to 2051	7,300	7,310	3,635	320	290	-150	4,095
2051 to 2056	8,480	8,355	3,170	390	320	65	3,945	
Growth	2001 to 2021	12,175	11,200	4,760	385	590	535	6,270
	2021 to 2046	65,260	59,525	21,185	2,600	2,190	-160	25,815
	2021 to 2051	72,565	66,835	24,825	2,915	2,480	-310	29,915
	2021 to 2056	81,045	75,190	27,990	3,305	2,800	-240	33,855
Annual Growth	2001 to 2021	610	560	240	20	30	25	315
	2021 to 2046	2,610	2,380	845	105	90	-5	1,035
	2021 to 2051	2,420	2,230	825	95	85	-10	995
	2021 to 2056	2,315	2,150	800	95	80	-5	965

## A) Village of Newbury Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	400	400	150	10	0	0	160
	2006	500	400	150	0	30	10	190
	2011	500	400	160	0	30	0	190
	2016	500	500	160	0	10	0	170
	2021	500	400	180	10	20	0	210
Forecast	2046	770	600	270	10	10	0	280
	2051	830	660	290	10	10	0	300
	2056	800	650	290	10	10	0	310
Growth	2001 to 2021	100	0	30	0	20	0	50
	2021 to 2046	270	200	90	0	-10	0	70
	2021 to 2051	330	260	110	0	-10	0	90
	2021 to 2056	300	250	110	0	-10	0	100
Annual Growth	2001 to 2021	5	0	0	0	0	0	5
	2021 to 2046	10	10	5	0	0	0	5
	2021 to 2051	10	10	5	0	0	0	5
	2021 to 2056	10	5	5	0	0	0	5

## B) Municipality of Southwest Middlesex Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	6,350	6,035	2,035	40	145	25	2,245
	2006	6,090	5,880	2,060	60	130	25	2,275
	2011	6,020	5,865	2,095	70	135	50	2,350
	2016	5,860	5,725	2,085	50	160	65	2,360
	2021	6,125	5,860	2,120	30	185	70	2,405
Forecast	2046	7,545	7,220	2,705	130	265	65	3,165
	2051	7,830	7,495	2,885	145	265	65	3,360
	2056	8,260	7,900	3,075	165	265	65	3,575
Growth	2001 to 2021	-225	-175	85	-10	40	45	160
	2021 to 2046	1,420	1,360	585	100	80	-5	760
	2021 to 2051	1,705	1,635	765	115	80	-5	955
	2021 to 2056	2,135	2,040	955	135	80	-5	1,170
Annual Growth	2001 to 2021	-10	-10	5	0	0	0	10
	2021 to 2046	55	55	25	5	5	0	30
	2021 to 2051	55	55	25	5	5	0	30
	2021 to 2056	60	60	25	5	0	0	35

### C) Municipality of Strathroy-Caradoc Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	19,895	18,980	5,775	190	895	130	6,990
	2006	20,695	19,965	6,200	200	865	235	7,500
	2011	21,510	20,985	6,485	205	1,010	270	7,970
	2016	21,515	20,845	6,785	240	1,015	260	8,300
	2021	24,840	23,880	7,510	355	1,275	315	9,455
Forecast	2046	44,030	42,330	14,140	1,155	2,295	285	17,875
	2051	45,875	44,105	15,180	1,250	2,330	255	19,015
	2056	47,885	46,040	16,035	1,370	2,350	270	20,020
Growth	2001 to 2021	4,940	4,900	1,735	165	380	185	2,465
	2021 to 2046	19,190	18,450	6,630	800	1,020	-30	8,420
	2021 to 2051	21,035	20,225	7,670	895	1,055	-60	9,560
	2021 to 2056	23,050	22,160	8,525	1,015	1,075	-45	10,565
Annual Growth	2001 to 2021	245	245	85	10	20	10	125
	2021 to 2046	770	740	265	30	40	0	335
	2021 to 2051	700	675	255	30	35	0	320
	2021 to 2056	660	635	245	30	30	0	300

### D) Municipality of Thames Centre Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	12,925	12,465	4,035	30	105	155	4,325
	2006	13,540	13,120	4,270	45	135	140	4,590
	2011	13,340	13,005	4,365	60	110	190	4,725
	2016	13,570	13,175	4,570	55	130	175	4,930
	2021	14,530	13,970	4,735	115	185	145	5,180
Forecast	2046	28,045	26,965	9,225	730	500	160	10,620
	2051	30,580	29,405	10,245	840	545	180	11,805
	2056	33,520	32,230	11,305	975	590	170	13,045
Growth	2001 to 2021	1,605	1,505	700	85	80	-10	855
	2021 to 2046	13,515	12,995	4,490	615	315	15	5,440
	2021 to 2051	16,050	15,435	5,510	725	360	35	6,625
	2021 to 2056	18,990	18,260	6,570	860	405	25	7,865
Annual Growth	2001 to 2021	80	75	35	5	5	0	45
	2021 to 2046	540	520	180	25	15	0	220
	2021 to 2051	535	515	185	25	10	0	220
	2021 to 2056	545	520	190	25	10	0	225

## E) Municipality of Middlesex Centre Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	14,765	13,795	4,570	0	115	40	4,725
	2006	16,145	15,575	4,825	60	110	235	5,230
	2011	16,920	16,505	5,410	125	90	35	5,660
	2016	17,770	17,265	5,700	110	130	45	5,985
	2021	19,695	18,925	6,165	200	130	200	6,695
Forecast	2046	43,350	41,650	13,560	1,130	805	110	15,605
	2051	45,970	44,170	14,610	1,205	1,005	30	16,855
	2056	48,905	46,990	15,435	1,290	1,275	70	18,065
Growth	2001 to 2021	4,930	5,130	1,595	200	15	160	1,970
	2021 to 2046	23,655	22,725	7,395	930	675	-90	8,910
	2021 to 2051	26,270	25,245	8,445	1,005	875	-170	10,160
	2021 to 2056	29,205	28,065	9,270	1,090	1,145	-130	11,370
Annual Growth	2001 to 2021	245	255	80	10	0	10	100
	2021 to 2046	945	910	295	35	25	-5	355
	2021 to 2051	875	840	280	35	30	-5	340
	2021 to 2056	835	800	265	30	35	-5	325

## F) Municipality of North Middlesex Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	7,145	6,735	2,175	50	75	30	2,330
	2006	6,975	6,720	2,170	0	100	35	2,305
	2011	6,825	6,665	2,195	0	130	10	2,335
	2016	6,525	6,320	2,180	0	125	35	2,340
	2021	6,550	6,325	2,175	0	160	55	2,390
Forecast	2046	7,245	6,995	2,525	20	220	45	2,810
	2051	7,195	6,950	2,570	25	220	35	2,845
	2056	7,245	6,995	2,600	25	225	40	2,890
Growth	2001 to 2021	-595	-410	0	-50	85	25	60
	2021 to 2046	695	670	350	20	60	-10	420
	2021 to 2051	645	625	395	25	60	-20	455
	2021 to 2056	695	670	425	25	65	-15	500
Annual Growth	2001 to 2021	-30	-20	0	-5	5	0	5
	2021 to 2046	30	25	15	0	0	0	15
	2021 to 2051	20	20	15	0	0	0	15
	2021 to 2056	20	20	10	0	0	0	15

## G) Municipality of Adelaide Metcalfe Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	3,300	3,100	940	10	20	0	970
	2006	3,300	3,100	970	10	10	10	1,000
	2011	3,200	3,000	1,000	10	10	10	1,030
	2016	3,100	3,000	980	0	10	0	990
	2021	3,100	3,000	1,010	0	10	10	1,030
Forecast	2046	4,630	3,430	1,450	0	0	50	1,360
	2051	4,660	3,560	1,570	0	0	30	1,460
	2056	4,720	3,680	1,650	0	0	40	1,530
Growth	2001 to 2021	-200	-100	70	-10	-10	10	60
	2021 to 2046	1,530	430	440	0	-10	40	330
	2021 to 2051	1,560	560	560	0	-10	20	430
	2021 to 2056	1,620	680	640	0	-10	30	500
Annual Growth	2001 to 2021	-10	-5	5	0	0	0	5
	2021 to 2046	60	15	20	0	0	0	15
	2021 to 2051	50	20	20	0	0	0	15
	2021 to 2056	45	20	20	0	0	0	15

## H) Municipality of Lucan Biddulph Population and Housing Forecast

	Year	Population (including undercount)	Census Population	Households				
				LDU	MDU	HDU	Other	Total
History	2001	4,400	4,200	1,290	10	130	10	1,440
	2006	4,400	4,200	1,340	20	150	10	1,520
	2011	4,500	4,300	1,460	30	90	20	1,600
	2016	4,900	4,700	1,630	40	120	20	1,810
	2021	5,900	5,700	1,910	70	140	10	2,130
Forecast	2046	10,910	8,140	3,030	140	160	50	3,530
	2051	10,880	8,290	3,210	160	170	30	3,710
	2056	10,960	8,500	3,320	190	150	40	3,860
Growth	2001 to 2021	1,500	1,500	620	60	10	0	690
	2021 to 2046	5,010	2,440	1,120	70	20	40	1,400
	2021 to 2051	4,980	2,590	1,300	90	30	20	1,580
	2021 to 2056	5,060	2,800	1,410	120	10	30	1,730
Annual Growth	2001 to 2021	75	75	30	5	0	0	35
	2021 to 2046	200	100	45	5	0	0	55
	2021 to 2051	165	85	45	5	0	0	55
	2021 to 2056	145	80	40	5	0	0	50

# ANNEX II



## Amended Housing and Population Table for Appendix B of OPA 4

### Middlesex County Population and Housing Forecast

Year	Population (including undercount)	Census Population	Households					
			LDU	MDU	HDU	Other	Total	
2021	<b>Middlesex County</b>	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	<b>Middlesex County</b>	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	

