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MEMORANDUM

То:	Mat Vaughan, Director of Planning and Development, County of Elgin
From:	Stefan Krzeczunowicz, Patrick Barbieri
Date:	February 4, 2025
Re:	Updated Growth Forecasts and Land Needs Assessment for County of Elgin

This memorandum provides updates to the population, housing, and employment forecasts for the County of Elgin, originally set out in the *Population, Housing and Employment Forecasts and Associated Land Needs Analysis* (County LNA) prepared by Hemson Consulting in June 2022 and amended on November 23, 2022. These updates incorporate analyses of recent developments—including the release of Fall 2024 Ministry of Finance Ontario Population Projections, Volkswagen's proposed electric vehicle (EV) battery plant in St. Thomas, and the proposed expansion of the Norman-Lyndale Tier I settlement area in the Municipality of Central Elgin—as well as recent growth trends. The objective is to assess the impact of these developments on the County's long-term growth prospects and associated land needs.

A. PURPOSE AND CONTEXT OF THE FORECAST UPDATE

The forecast update addresses significant developments that have occurred since the completion of the County LNA, including:

 Release of Fall 2024 Ministry of Finance Ontario Population Projections (MOF Projections): The MOF Projections estimate a population of 141,600 permanent residents in the Elgin Census Division by 2051, an increase of 9,500 residents compared to the County LNA forecast. The Elgin Census Division, as defined by Statistics Canada, includes the County of Egin and the City of St. Thomas.

The *Provincial Planning Statement 2024* (PPS 2024) which came into force on October 20, 2024, requires the County to base its population and employment forecasts on the MOF Projections, or a modified version of the projections as appropriate.

- 2. Volkswagen EV Battery Plant: The plan by Volkswagen to construct a major electric vehicle (EV) battery plant on a 1,500 acre site in St. Thomas, which is expected to transform the regional economy. The plant is projected to create 2,000 to 3,000 on-site jobs, with thousands of additional spin-off jobs. In 2023, the Provincial Government passed Bill 63, the *St. Thomas-Central Elgin Boundary Adjustment Act*, which transferred 700 acres of land from the Municipality of Central Elgin to the City of St. Thomas. This is in addition to 800 acres purchased by St. Thomas in 2022.
- 3. Proposed Expansion of Norman-Lyndale Tier I Settlement Area: The expansion involves approximately 270 acres of land located at 467 Sunset Drive, in the Municipality of Central Elgin. These lands, previously part of the site of the St. Thomas Psychiatric Hospital, are currently owned by the Province of Ontario. Redevelopment plans are underway to convert the area, which is currently cultivated farmland, for residential or mixed uses.

The main purpose of the updated forecasts is to translate the higher MOF Projections into a revised housing unit forecast, an associated employment growth forecast, and an assessment of the sufficiency of the County's remaining vacant land supply across local municipalities. It is noted that the 2021 vacant supply data used for the County LNA has not been updated as part of the analysis.

B. APPROPRIATE USE OF 2024 MOF PROJECTIONS

The PPS 2024 now requires the County to base its population and employment forecasts on MOF projections, or a modified version of the projections as appropriate. As such, the forecasts set out in this memo are based on population growth contained in the 2024 MOF Projections. However, care should be taken if these forecasts are to be used to make substantive changes to the County OP for the following reasons:

- First, the MOF Projections are annual projections of population not employment, whereas the most significant changes to growth forecasts in the County LNA are related to employment.
- Second, the MOF Projections are produced annually for Ontario and its 49 Census Divisions. As noted above, the Elgin Census Division includes both the County and St. Thomas.



- Third, the MOF Projections assume that population growth will reflect recent migration trends and the continuing evolution of long-term fertility and mortality patterns. To that extent, they are not "forecasts" that explicitly account for changes in future Federal immigration policies, and local housing demand, land use plans, infrastructure investments, or the availability of land for development. As such, projections for Census Divisions with limited land for development may overstate the growth potential. And projections for areas with significant planned infrastructure investment may understate growth potential.
- Of particular relevance to the County of Elgin is that the MOF Projections are highly variable and are particularly sensitive to shifts in Federal immigration and nonpermanent resident (NPR) policies. While immigration and NPRs contribute minimally to Elgin County's growth (10% and 6%, respectively, between 2018/19 and 2022/23), broader immigration and NPR trends influence intra-provincial migration to the County. Early in 2024, some changes to NPR targets were carried out, particularly to reduce the numbers of international students. Other changes through that year have sought to tighten eligibility for employers to hire temporary foreign workers. In September of 2024, following a Federal Cabinet retreat, the government announced a review of the targets for permanent immigration. And more recently, it cut permanent resident targets 20% from 500,000 to 395,000 in 2025 and plans to keep it on a downtrend after that with 380,000 in 2026 and 365,000 in 2027. The new targets for permanent residents will still be well above historical levels. However, they will be much more in line with immigration levels assumed under the original County LNA. Future MOF projections may therefore be expected to decrease as the reduced immigration targets take full effect.

In short, while the MOF Projections can provide valuable insights, they must be interpreted with caution, considering their variability, sensitivity to changing Federal policies, and limited capacity to reflect local development opportunities and constraints.

Figure 1 outlines the components of growth for the Elgin Census Division based on the MOF Projections.



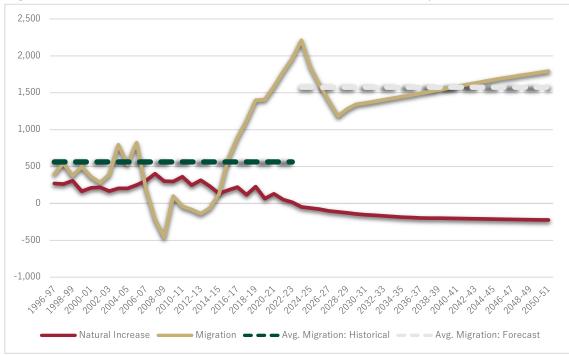


Figure 1: Components of Population Growth, MOF Population Projections

Source: Hemson Consulting, based on MOF Projections, Fall 2024

C. GROWTH FORECAST UPDATE

The 2024 MOF Projections, which serve as the basis for this update, provide population projections only and are limited to the Census Division level, encompassing both the County and City of St. Thomas. To develop a revised forecast for the County, the following steps were undertaken:

Census Division Population Allocation: The growth distribution between the County and City remains consistent with the assumptions in the County LNA. This means that approximately 50% of the projected population growth from 2021 to 2051 is allocated to each. The MOF Projections estimate a total growth of 43,000 people for the Elgin Census Division, with 21,080 allocated to the County. Figure 2 illustrates the difference between the County LNA and MOF Projections to 2051.¹

¹ It is noted that in April 2024, the City of St. Thomas released an updated 2051 population growth forecast of 79,500 by 2051. These forecasts rightly note that the then most recent (2023) MOF Projections do not account for the impact of the EV battery plant on the City's growth (see Watson and Associates, *Growth Analysis Study*, April 2024).



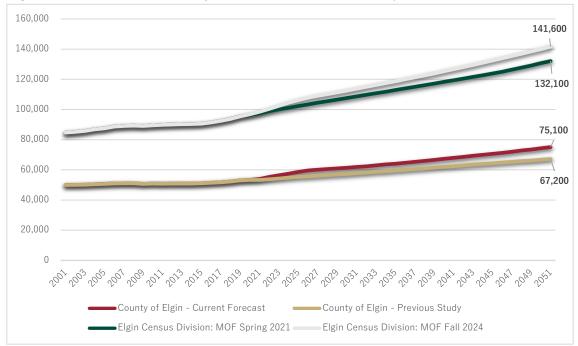


Figure 2: Comparison of County LNA Forecast and MOF Projections to 2051

Source: Hemson Consulting, based on MOF Projections, Fall 2024.

- Allocation of County Growth to Local Municipalities: Revisions to the allocation of population, housing, and employment throughout the County reflect recent developments, including:
 - population and housing growth trends as identified in Statistics Canada's
 2024 Annual Demographic Estimates and recent CMHC housing market data;
 - employment expectations for the County associated with the EV battery plant as set out in Hemson's memorandum *Update to Hemson Growth Forecasts and Land Needs*, dated November 23, 2023; and
 - o observations on County growth expectations set out in Hemson's memorandum *Comments on Possible Expansion to Norman-Lyndale Settlement Area*, dated August 30, 2024.

Additional employment growth in the County resulting from the EV battery plant, as well as employment arising from increased population growth, have been allocated based on the same methodology used for the County LNA. Population-related employment is generally allocated on the basis the location of population growth. Employment land employment is allocated to local municipalities with existing vacant employment lands, such as Southwold and Central Elgin.



i. Revised Population Allocations

As shown above in Figure 2, the 2024 MOF Projections estimate higher population growth for the Elgin Census Division to 2051 compared to the earlier County LNA. The updated population forecasts for the County assume that this higher growth will incorporate additional population and housing arising from the new battery plant for the following reasons:

- The long-term demand for housing in the County is unlikely to be significantly impacted by the plant. The housing forecasts in the County LNA implicitly assume that a small portion of workers employed in the County's employment areas will reside in newly constructed housing within the County.
- The battery plant, expected to create up to 3,000 on-site jobs in St. Thomas, could result in approximately 15% of these workers (about 450 individuals) choosing to live in the County. This would generate an estimated demand for 225 additional housing units, accounting for the likelihood that some workers may transition from existing jobs within the County to positions at the plant. This represents only 3% of the 30-year housing demand forecast of 7,220 units in the County LNA.

As shown in Figure 3, Central Elgin has been allocated a greater share of updated population growth due to the potential expansion of the Norman-Lyndale settlement area and its proximity to the battery plant. Central Elgin's annual growth rate has increased by 1%, resulting in an additional 3,910 people by 2051. All other local municipalities in the County also exhibit increased growth rates to 2051.



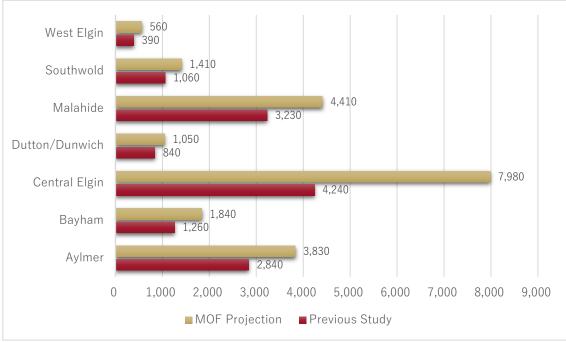


Figure 3: Updated Local Population Forecasts, 2021-2051

ii. Employment Growth Impacts

Although development of the battery plant is still in its early stages, construction and initial production at the plant will likely occur prior to the next County Official Plan review in 5 to 10 years. Nevertheless, the employment forecasts in the County LNA remain a reasonable basis on which to plan for employment on both designated employment land and other community-related and rural employment activities.

As a result of incorporating the higher population growth associated with the 2024 MOF Projections, total employment in the County is also expected to grow correspondingly. All local municipalities are forecast to see an increase in employment by 2051, particularly those with available employment lands, such as Central Elgin and Southwold. Figure 4 illustrates the revised employment growth for the County's local municipalities.



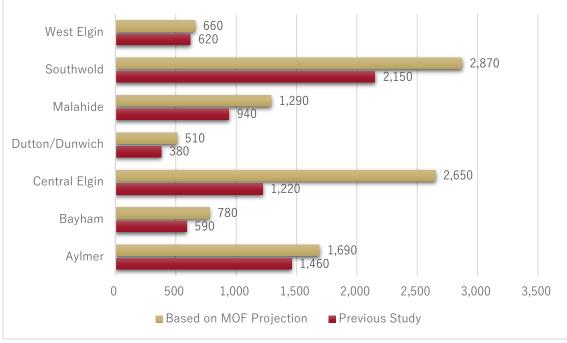


Figure 4: Updated Total Employment Forecasts, 2021-2051

a) Employment Land Employment Impacts

Volkswagen's EV battery plant is expected to create up to 3,000 on-site jobs in St. Thomas. Employment land job growth associated with this development within the County is anticipated to be concentrated in Southwold and Central Elgin, reflecting their existing vacant employment lands and the potential spin-off effects of the plant (see Figure 5).²

² For a detailed discussion of the job multipliers, and timing and location of job growth associated with the battery plant, including implications for County growth and land needs, see Hemson Consulting, *Update to Hemson Growth Forecasts and Land Needs*, November 23, 2023.



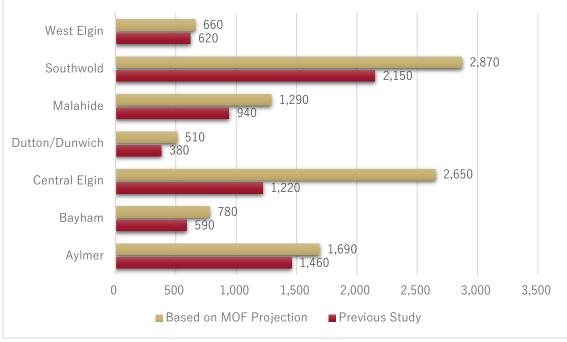


Figure 5: Updated Employment Land Employment Forecasts, 2021-2051

The updated employment land employment forecasts consider the following factors:

- Large manufacturing investments, like the EV battery plant, do not necessarily generate significant growth in their immediate vicinity. Much of the construction labour and permanent operating employment will consist of commuters from London, St. Thomas, and urban areas beyond the County.
- The original County LNA forecasts already accounted for similar levels of economic, employment, and housing growth over a 30-year horizon, even though the concentrated nature of growth resulting from this single major investment was not specifically anticipated.
- Official plans are regularly reviewed. If growth exceeds forecast targets—whether or not driven by the EV battery plant—the County's Official Plan can be revised during scheduled reviews or at any other time, as needed.

b) Non-Employment Land Impacts

Employment growth outside designated employment areas is divided into two categories: "population-related employment" and "rural employment":



- **Population-related employment** is employment in Elgin that primarily serves the resident population and includes sectors such as retail, education, health care, local government, and urban work-at-home employment. The distribution of population-related employment across the County is largely tied to population growth and the community area (i.e. residential) land needs assessment accounts for urban land needs associated with this type of employment. To the extent that the County's population and housing forecasts remain unaffected by the battery plant (see below), the plant's impact on population-related employment in urban communities is expected to be minimal.
- Rural Employment encompasses jobs in rural areas, including primary industries and agriculture, as well as some uses typically found in urban employment areas, but not located on urban land designated for industrial or commercial use. These are typically small-scale manufacturing or construction businesses as well as tourism (including agri-tourism) and recreation activities which play an important role in Elgin. Also important in the Elgin context is the role of agricultural labour, particularly in Bayham and Malahide. While the battery plant is unlikely to directly impact most of these activities, additional retail or service demands may arise from workers on their way to work from London through Southwold and Central Elgin along Highways 4 and 30, and Wonderland Rd South and Wellington Rd South.

Commuters to the battery plant could provide increased trade to gas stations on these major routes (though it is unclear whether there are any stations currently in the County at these locations). Of note is that, by 2051, the vast majority of passenger vehicles will be electrically powered. Convenience retail demand from commuters may also grow slightly, but it is unlikely to warrant significant retail space or employment lands.

Food services are another commercial use potentially affected by commuter traffic from London. However, large manufacturing employers often provide on-site food services, reducing external demand. Additionally, St. Thomas already hosts numerous coffee shops and fast food outlets, including a Tim Hortons very near the battery plant site at Highways 52 and 30. Given the existing and planned commercial developments in London, along the Highway 401 corridor (e.g. ON Routes), and in St. Thomas, any additional demand from commuters is expected to be adequately met over time.



D. UPDATED LAND NEEDS ASSESSMENT: COMMUNITY AREA

The methodology for calculating the Community Area Land Needs based on the 2024 MOF Projections remains consistent with the approach outline in the County LNA. Key factors include:

- a net-to-gross land need assumption of 60% to 70%, accounting for land required for municipal infrastructure, local retail, and institutional requirements;
- an expected density of 25-27 residential units per net hectare for future residential development;
- housing-type propensities consistent with the County LNA; and
- vacant land supply data that aligns with the County LNA.

This update incorporates the newly available 2021 Census net undercoverage rates for each municipality and revises the assumption for expected community area jobs, reducing it from 1 job per 12 people to 1 job per 10 people to reflect latest trends.

i. Housing Allocations and Growth

Table 1 summarizes the distribution of total housing in the County between 2021 and 2051. In keeping with PPS and County Official Plan policies, most growth will be directed to Tier 1 settlement areas, either through intensification within built-up areas or development on vacant land in designated growth areas (DGA). A smaller share of housing growth is allocated to rural settlements and scattered lots in rural areas.



			Total Unit
	2021	2051	Growth
Aylmer	3,070	4,550	1,480
Bayham	2,260	3,050	790
Central Elgin	5,460	9,220	3,760
Dutton/Dunwich	1,600	2,100	500
Malahide	3,010	4,510	1,500
Southwold	1,710	2,520	810
West Elgin	2,100	2,490	390
Elgin County	19,210	28,440	9,230

Table 1: Housing Allocations, 2021-2051

Source: Hemson based on MOF Projections, Fall 2024.

Table 2 shows the amount of housing growth forecast to occur in each lower-tier municipality as intensification within the existing built-up area between 2021 and 2051. About 16% of new units are expected to be built as intensification within the built-up area, requiring no additional land.

	Total Unit	Intensification	Intensification
	Growth	Rate	Units
Aylmer	1,480	20%	296
Bayham	790	15%	119
Central Elgin	3,760	20%	752
Dutton/Dunwich	500	15%	75
Malahide	1,500	10%	150
Southwold	810	15%	122
West Elgin	390	0%	0
Elgin County	9,230	16%	1,513

Table 2: Housing Growth Through Intensification, 2021 - 2051

Source: Hemson Consulting

Table 3 sets out the share of housing growth—about 8% across the County—that is forecast to be accommodated in rural areas, both within unserviced Tier 3 settlement areas as well as on scattered vacant lots of record outside settlement areas. As with the intensification units, development in the Tier 3 settlement areas and rural areas is assumed to not require any additional land as there is sufficient vacant land already available in those areas. No rural area growth is assigned to Alymer.



	Total Unit		
	Growth	Tier 3 Share	Tier 3 Units
Aylmer	1,480	0%	0
Bayham	790	10%	79
Central Elgin	3,760	10%	376
Dutton/Dunwich	500	10%	50
Malahide	1,500	10%	150
Southwold	810	10%	81
West Elgin	390	10%	39
Elgin County	9,230	8%	775

Table 3: New Housing in Tier 3 Settlements & Rural Areas, 2021 - 2051

The remaining 75% of housing growth—6,942 units—will take place in the DGA (see Table 4).

		Designated	Designated
	Total Unit	Growth Area	Growth Area
	Growth	Share	Units
Aylmer	1,480	80%	1,184
Bayham	790	75%	593
Central Elgin	3,760	70%	2,632
Dutton/Dunwich	500	75%	375
Malahide	1,500	80%	1,200
Southwold	810	75%	608
West Elgin	390	90%	351
Elgin County	9,230	75%	6,942

Table 4: Housing Growth in Designated Growth Areas, 2021 - 2051

Source: Hemson Consulting

ii. Density and Land Requirements

A survey of recently constructed housing densities across Elgin's settlement areas undertaken as part of the County LNA informed the analysis, with density assumptions for future development being slightly higher than current trends to align with Provincial and



Official Plan policies promoting a more compact urban form and transit-supportive settlement areas:

- Central Elgin and Aylmer: 27 units per hectare
- Other DGA: 25 units per hectare

Based on the housing unit allocations and density assumptions, a "net" community area land need for the DGA is calculated for each municipality. Net land needs are then translated into gross (developable) land needs to accommodate public lands (e.g. local parks, local roadways, stormwater management facilities, and local schools) and population-related employment (e.g. local retail). Table 5 summarizes the net and gross land requirements for each municipality.

			Net Land Need	Net to Gross	Gross Land
	DGA Units	Unit Density	(ha)	Assumption	Need (ha)
Aylmer	1,184	27	43.9	60%	73.1
Bayham	593	25	23.7	70%	33.9
Central Elgin	2,632	27	97.5	60%	162.5
Dutton/Dunwich	375	25	15.0	70%	21.4
Malahide	1,200	25	48.0	70%	68.6
Southwold	608	25	24.3	70%	34.7
West Elgin	351	25	14.0	70%	20.1
Elgin County	6,942	26	267.7	65%	412.2

Table 5: Land Required in Designated Growth Areas (DGA) to 2051

Source: Hemson Consulting

iii. Sufficiency of Supply

This land need is then compared to the availability of vacant land in Tier 1 and Tier 2 settlement areas to determine the sufficiency of supply. Table 6 displays the results of this comparison.



					Sufficiency of
		Vacant Land:	Vacant Land:		Vacant Land to
	Gross Land	Tier 1	Tier 2		Accommodate
	Need (ha)	Settlements	Settlements	Vacant Land	Allocation
Aylmer	73.1	37.5	0.0	37.5	(35.6)
Bayham	33.9	122.8	0.0	122.8	89.0
Central Elgin	162.5	61.3	81.3	142.6	(19.9)
Dutton/Dunwich	21.4	68.1	0.0	68.1	46.7
Malahide	68.6	0.0	87.5	87.5	18.9
Southwold	34.7	0.0	108.8	108.8	74.1
West Elgin	20.1	100.8	0.0	100.8	80.8
Elgin County	412.2	390.5	277.6	668.2	256.0

Table 6: Sufficiency of DGA Residential Vacant Land to 2051 (gross ha)

As seen above, Elgin County as a whole has sufficient designated residential land to meet growth projections to 2051. However, Aylmer continues to face a land deficiency, as it did under the County LNA, and Central Elgin is now projected to run out of vacant land before 2051 (see Table 7).

	2021 Report	2024 Update
Aylmer	(20.8)	(35.6)
Bayham	93.2	89.0
Central Elgin	36.7	(19.9)
Dutton/Dunwich	47.5	46.7
Malahide	29.4	18.9
Southwold	75.8	74.1
West Elgin	81.3	80.8
Elgin County	343.3	256.0

Table 7: Sufficiency of DGA, County LNA vs. 2024 Update

Source: Hemson Consulting

E. UPDATED LAND NEEDS ASSESSMENT: EMPLOYMENT AREA

This section presents the results of the updated employment area land needs assessment. Employment area is generally required to accommodate employment land employment growth.³ Table 8 provides details on employment land employment growth forecasts to 2051.

³ Both the *Planning Act* (in 2023) and the Provincial Planning Statement (in 2024) introduced updated definitions of an "area of employment", excluding institutional and commercial uses, except for retail and office uses



The County requires sufficient employment land to support the addition of about 5,200 new jobs, which represents an increase of 1,300 jobs compared to the earlier forecasts for 2051 in the County LNA (see Table 8). A small portion of these new jobs can be accommodated as intensification on existing sites in the Town of Aylmer and Township of Southwold. The land needs assessment assumes that approximately 6% of all employment land employment job growth will occur through intensification.

			Total ELE
	2021	2051	Growth
Aylmer	1,600	2,455	855
Bayham	350	432	82
Central Elgin	1,530	2,706	1,176
Dutton/Dunwich	110	110	0
Malahide	670	670	0
Southwold	650	3,230	2,580
West Elgin	340	837	497
Elgin County	5,250	10,440	5,190

Source: Hemson Consulting

The land needs assessment assumes an employment land density of 20 jobs per net hectare in municipalities where lands are generally serviced and between 12 and 15 jobs per net hectare in municipalities where lands are generally unserviced. Table 9 presents the net land need required to accommodate the employment land jobs in Tier 1 and Tier 2 settlement areas.

associated with manufacturing, warehousing, and other permitted uses. This change is expected to have minimal impact on the County's land needs assessment, as most employment areas in Elgin lack the now-excluded uses.



	Job Growth on	Density	Land Need to		Gross
	Employment	Assumed (Jobs	Accommodate	Net to Gross	Developable
	Lands	per Net ha)	Job Growth (ha)	Assumption	Land Need (ha)
Aylmer	684	20	34.2	80%	42.8
Bayham	41	12	3.4	85%	4.0
Central Elgin	847	20	42.3	80%	52.9
Dutton/Dunwich	0	n/a	n/a	n/a	n/a
Malahide	0	n/a	n/a	n/a	n/a
Southwold	2,245	20	112.2	80%	140.3
West Elgin	248	15	16.6	85%	19.5
Elgin County	4,065	19	208.7	80%	259.5

Table 9: Employment Area Land Need 2021 - 2051

The net land need shown in Table 9 is translated into a gross land need using net-to-gross factors. This accounts for long-term site vacancy due to topographical and locational constraints and provides for public land needs, such as local roads, stormwater management facilities, and other utilities in employment areas.

Based on this analysis, the County will need approximately 260 gross developable hectares of designated employment land to meet the forecast employment land employment growth to 2051.

The sufficiency of the currently designated employment lands in Elgin is summarized in Table 10. This table demonstrates that the County's employment area land supply is adequate to meet the forecast employment growth, both at the County level and locally. The Township of Southwold, in particular, has a significant long-term supply of vacant employment land. These findings are not materially different from those set out in the earlier County LNA (see Table 11).



			Sufficiency of
		Vacant Land	Vacant Land to
	Gross Land	within Tier 1 & 2	Accommodate
	Need (ha)	Settlements	Allocation
Aylmer	42.8	42.8	0.0
Bayham	4.0	4.0	0.0
Central Elgin	52.9	107.0	54.1
Dutton/Dunwich	n/a	n/a	n/a
Malahide	n/a	n/a	n/a
Southwold	140.3	198.4	58.1
West Elgin	19.5	19.5	0.0
Elgin County	259.5	371.7	112.2

Table 10: Sufficiency of Employment Area to 2051 (Gross Ha)

Source: Hemson Consulting

Table 11: Sufficiency of Employment Area, County LNA vs. 2024 Update

	2023	
	Supplemental	
	Report	2024 Update
Aylmer	0.0	0.0
Bayham	0.0	0.0
Central Elgin	62.0	54.1
Dutton/Dunwich	n/a	n/a
Malahide	n/a	n/a
Southwold	93.5	58.1
West Elgin	0.0	0.0
Elgin County	155.6	112.2

Source: Hemson Consulting

F. CONCLUSIONS

The updated analysis above aligns with Provincial planning requirements and provides a framework for addressing the County's evolving land use and growth management needs. Based on this analysis, the following conclusions are made:



- **Updated Population Projections:** The 2024 MOF Projections estimate a population of 141,600 permanent residents in the Elgin Census Division by 2051, representing an increase of 9,500 residents compared to the County LNA forecast.
- Caution in Using MOF Projections: While the PPS 2024 requires the County to base its population and employment forecasts on the MOF Projections, these projections should be interpreted with caution, considering their variability, sensitivity to changing Federal policies, and limited capacity to reflect local development opportunities and constraints. Future MOF Projections may be expected to decrease as reduced Federal immigration targets are implemented over the coming years.
- County-Wide Planned Growth Remains Valid: In general, planned housing growth in Elgin and designated employment areas remain an appropriate basis for the County Official Plan. These do not require wholesale revisions due to the announcement of the new EV battery plant or the municipal boundary adjustments made in 2023 to accommodate the plant. If growth accelerates in the County beyond the updated forecasts set out in this memo, whether attributable to the plant or other factors, the County Official Plan can be reviewed and updated during a regular review or as needed.
- **Growth Distribution:** Most additional population and housing growth from the 2024 MOF Projections will take place in Central Elgin. Most additional employment growth will occur in Central Elgin and Southwold.
- **County-Wide Residential Land Needs:** Elgin County as a whole has sufficient designated residential land to meet the updated growth forecasts to 2051. However, Aylmer continues to face a land deficiency, as it did under the County LNA, and Central Elgin is now projected to run out of vacant land before 2051.
- Residential Land Needs in Central Elgin: As noted in Hemson's memorandum *Comments on Possible Expansion to Norman-Lyndale Settlement Area*, 30 August 2024, in planning for additional residential land needs in Central Elgin:
 - Norman-Lyndale is situated directly adjacent to St. Thomas, with the proposed expansion area adjoining an existing residential area of the city. As such, the proposed expansion area represents the logical extension of the urban communities of both Norman-Lyndale and St. Thomas. The area



is appropriate location for growth and development and offers opportunities to provide a full mix and range of housing, including affordable housing.

- Although Central Elgin has enough vacant land within its Tier 1 and 2 settlement areas to accommodate near-term and long-term housing growth, the vacant residential land in the Municipality's Tier 1 settlement areas is insufficient to meet long-term residential land needs to 2051. Therefore, provided that full municipal water and wastewater services can be extended to the proposed expansion area in a cost-effective manner, the expansion area is more suitable for urban development than lands located in Tier 2 settlement areas.
- **Employment Land Needs:** Finally, the County's employment area land supply is adequate to meet forecast employment growth, both at the County level and locally. Southwold, in particular, has a significant long-term supply of vacant employment land. These findings are consistent with those outlined in the earlier County LNA.

