

LAND NEEDS ASSESSMENT – PUBLIC & MUNICIPAL INPUT COMPILATION

1. FRANK DURCO JR. – DURCO HOMES - SARNIA

December 4, 2025

To: The Corporation of the County of Lambton
Development Services Department

I am writing on behalf of Durco Homes Inc. regarding the new Official Plan Review.

We own 82 acres of farmland located at Con 9 Pt. Lot 15 Pt. Lot 16 New Lakeshore Road in Bright's Grove, between Huron Oaks Golf Course and the Huron House Boys' Home.

I would like to request that this property be included in the new Official Plan for Lambton County.

This property was included in the previously proposed Sarnia Area 3 of the Official Plan.

At this time, I would like to highlight several reasons for its inclusion. First, the location offers excellent walkability to numerous amenities, including grocery stores, doctors' offices, schools, churches, and of course, the beautiful beaches of Lake Huron. This development would provide increased support for the local businesses already existing in the commercial plazas.

Additionally, there is capacity in the sewage lagoon for over 1000 units and more can be added.

Finally, we feel that people in Sarnia-Lambton need more choice in where they would like to live, plus more development means more competition which leads to affordability for the home buyer. I would like to express that this is an important and exciting time for the County, and we would very much appreciate the opportunity to be part of its future.

Thank you for your time and consideration.

Durco Homes Inc,

Frank Durco Jr.

2. MATTHEW HEATHER – MARK & MATT HUZEVKA - SARNIA

[See Attached: Comment 2]

Summary: Their Clients, Matt and Mark Huzevka, would like a settlement boundary expansion for the Sarnia Urban Centre at 6941 Waterworks Road, Bright's Grove. They suggest that the LNA could be modified to give Sarnia a greater proportion of the County's overall growth allocation, question the assumptions in mix of residential unit types, and have questions about the exclusion of a commercial/institutional land supply in the LNA report.

3. TRACEY PILLON-ABBS - NE CORNER OF HWY 402 AND MODELAND RD - SARNIA

From: Tracey Pillon-Abbs <tracey@pillonabbs.ca>

Sent: Thursday, November 6, 2025 10:50 AM

To: Official Plan Review/Update <opreview@county-lambton.on.ca>

Subject: COP review

Good Morning COP Review

I would like to be kept notified of this process, public meeting and open house dates and any other aspect of the County Official Plan Review.

I represent the landowner located at the northeast corner of Hwy 402 and Modeland Road. They wish to be included in an expansion of the settlement area for a proposed commercial development.

Please let me know if you require any additional information at this time.

Thanks,

Tracey Pillon-Abbs, RPP

Principal Planner

4. MIKE RADCLIFFE – SILVER SPRINGS – PLYMPTON-WYOMING

From: Mike Radcliffe

Sent: Monday, October 20, 2025 1:05 PM

To: Corrine Nauta <Corrine.Nauta@county-lambton.on.ca>

Subject: Re: Lambton County Development Services Communications - County Official Plan Review and Draft Population Projections

Hi Corrine,

My name is Mike Radcliffe and I am the president of 2407028 Ontario Inc. I have been developing residential homes in Wyoming in the Silver Springs subdivision for the past 6 years. We are almost completely built out of the 95 single family homes and we are completely built out of the 8 townhouses and 30 semi detached homes. I own the property adjacent to the subdivision which has 3 stub access roads and the area stormwater management pond. I would like my 26.9 acre parcel considered for inclusion in the urban growth expansion plan. The town has lands that are in the urban growth boundary now, with farmers that have no interest in developing. I not only have interest in continuing to develop in this community but I have the knowledge, skills and resources to make it happen. I would ask that my property be given priority in the process as it is a waste to give lands to someone who will never develop and hold off on the growth of the town. I have attached the registry office information on the property I own and some concept maps I had Dobbin engineering do a couple years ago as I started thinking ahead for the future of this property.

Please let me know if there is anything else you need.

Thanks for your consideration,

Mike Radcliffe

[See Attached: Comment 4 Mapping]

5. ROB LONGO – PLYMPTON-WYOMING

From: Rob Longo

Sent: Tuesday, October 21, 2025 7:32 PM

To: Official Plan Review/Update <opreview@county-lambton.on.ca>

Cc: Lou Longo

Subject: Official Plan Inclusion Request

Hello,

We have reviewed the lands need assessment study completed by Parcel Economics.

Our property within the Errol Village settlement area is shown on the 2 attachments.

The L-shaped property currently has a draft approved subdivision on the north portion, which is partially developed as illustrated.

Part of the southern portion along Fleming Drive is already residential designated, as noted. However there is a block to the east as shown in the bright green highlighting, which is not included within the urban boundary.

This land forms part of the entire singular parcel of land. We would request that it would be included in the urban settlement boundary going forward.

The parcel is in a unique situation as it will become totally landlocked by the development of the west side of the parcel, the golf course to the east of the property and creek near the northern limit.

If that portion of property remains outside of the urban settlement boundary it may hinder the development of the west portion that is already included and zoned.

Proper urban planning would call for this complete parcel to be studied and appropriately planned for as one contiguous block, rather than just developing the currently included western half. Not taking in the holistic parcel would leave the east portion land locked and isolated for future development, and create significant issues with the development of the western half while trying to make proper planning for servicing, utilities and traffic.

If you could please confirm receipt of this note I would appreciate it, and we appreciate your consideration and welcome any further discussion about this inclusion in the urban settlement boundary.

Rob Longo

Coldwell Banker Southwest Realty

[See Attached: Comment 5 Mapping]

6. URBANMETRICS - SOUTHSIDE GROUP – PLYMPTON-WYOMING

[See Attached: Comment 6]

Their client has interest in settlement boundary extension of Secondary Settlement at Queen St and Lakeshore (P-W).

Suggests the LNA may be understating the County's greenfield land requirements.

Questions selection of lands in P-W land supply and whether development readiness was considered.

Questions whether regional market demands were factored into individual municipal land needs.

Suggests land demands in Sarnia and County may be underestimated as a result of residential unit mix assumptions.

Would like to see the assumptions in the metroeconomics modeling that predicted residential unit mix and suggests establishing this demand before allocating growth to municipalities.

Recommends changing planning horizon to 2056.

Suggests LNA should assume 10% of residential units absorbed as seasonal units.

7. RYAN FERRARI – JN VENTURES – PLYMPTON-WYOMING

[See Attached: Comment 7]

Agrees no new settlement expansion is warranted in P-W. Requests removal of development caps from client's lands in P-W.

Asks about the exclusion of lots <200sq.m. from land supply.

Questions about relation of Natural Heritage System lands and land supply, especially near Bright's Grove.

Asks about Sarnia's "Area 2" relation to the land supply.

Encourages increasing intensification targets in local plans.

8. BRITTANY & PAUL VAN BREE

From: Brittany Cartwright

Sent: Monday, November 3, 2025 6:46 AM

To: Official Plan Review/Update <opreview@county-lambton.on.ca>

Cc: Paul Van Bree

Subject: Lambton County OP Review

Dear Planning Team,

Thank you for the opportunity to provide feedback on the Lambton County Official Plan Review. As local developers, we have reviewed the proposed changes and would like to share the following observations and recommendations:

1. Concentration of Land Ownership in Plympton-Wyoming

We are concerned that the concentration of farmland designated as "Future Residential" within Plympton-Wyoming under a single ownership limits competition among developers. This lack of diversity in land ownership can restrict the pace of development, contribute to an undersupply of housing, and ultimately drive up housing costs for residents. A more balanced distribution of future residential lands among multiple landowners would encourage healthy market competition, promote timely housing delivery, and better support municipal growth objectives.

2. Increased Residential Designations in Sarnia and St. Clair

We agree that the City of Sarnia, in particular, would benefit from a significant increase in residential land designations to address the anticipated housing shortfall. The Township of St. Clair could also benefit from additional residential allocations to meet growing housing needs.

3. Commercial and Industrial Opportunities Near Camlachie

Consideration could be given to redesignating some of the farm lands around Camlachie to Commercial or Industrial use. As this area continues to grow, there will be an increasing need for local amenities—such as grocery stores, gas stations, and restaurants—to support the expanding population and local employment base.

4. Limited Demand in Enniskillen

It may not be necessary to emphasize border expansion or increased residential allocation in the Enniskillen area, as current and projected housing demand there appears to be limited.

We appreciate the County's efforts to plan for balanced, sustainable growth and thank you for considering our input.

Kind regards,

Brittany Van Bree and Paul Van Bree

9. ST CLAIR TOWNSHIP

From: Carlie McClemens <cmcclemens@stclairtownship.ca>

Sent: Thursday, December 18, 2025 11:00 AM

To: William Nywening <William.Nywening@county-lambton.on.ca>; Craig Ferguson; Ian MacDougall <Ian.MacDougall@county-lambton.on.ca>

Cc: Mary Lou Tanner; Denise Horne; Corrine Nauta <Corrine.Nauta@county-lambton.on.ca>

Subject: Re: St. Clair Supply Maps

Good morning,

Please see attached maps that we have marked up with suggested changes. The lands that we have suggested to add reflect to current owners' desire to possibly develop for residential growth. The lands to be removed are either located within an EP zone or too close to Polymore Drive (the Township's Industrial Park).

Please let me know if you require anything further at this time.

Kind Regards,

Carlie McClemens

Deputy Clerk/ Coordinator of Planning

Township of St. Clair

[See Attached: Comment 9 Mapping 1 & 2]

10. JANA LORBETSKI – PLYMPTON-WYOMING

From: jana lorbet ski

Sent: Thursday, November 20, 2025 9:34 AM

To: Official Plan Review/Update <opreview@county-lambton.on.ca>

Subject: Home building Camlachie.

To whom this may concern,

I have written emails before in the past and it doesn't hurt to write them again. I live on Eton Court. I've lived here since 2012 and prior to that in Bricegrove since 1995. I have watched subdivisions go up and I have watched numbers of failed properties that have been purchased for home. Building projects only to lay empty for a very long time. It saddens me and hundreds and hundreds of other people to know that developers have the opportunity to purchase these properties, destroy them and take their sweet time at sporadically building monstrosity of homes. Homes that have no yard homes with roof lines that look like the great pyramids homes that are beyond unaffordable in this day and age. I know the laws, the rules, the building permits and all that have changed but when is this gonna end. I understand likely not. As a concerned, citizen about the power grid around here as well as the sewage system that can barely support what is happening now, i'm reaching out in hopes that somehow someday something will change. Anyway, I hope this finds you well. I love this community. I love the people in it. I love the people that support us. I am a first responder, but with Coast Guard, not the roads. But I do stand behind watching local EMS struggle to get in or out of the only options we have as far as roadways. And by all means, I'm not asking for more roadways we just don't need any more traffic.

Best regard Jana Lorbetski

11. FALLON BURCH - CHIPPEWAS OF THE THAMES FIRST NATIONS

From: Fallon Burch

Sent: Monday, January 5, 2026 11:53 AM

To: William Nywening <William.Nywening@county-lambton.on.ca>

Subject: RE: Lambton County Official Plan Review and Draft Growth Projections

Good morning Will,

The Chippewas of the Thames First Nation (COTTN), also known as Deshkan Zibiing, is an Anishinaabe community whose traditional lands span across southwestern Ontario. These lands

are tied to several pre-Confederation treaties with the Crown and were formally acknowledged by Canada in the Big Bear Creek Land Claim Settlement Agreement of 2013.

Due to capacity at this time, we were unable to do a comprehensive review of the draft report for growth and land needs projections but focused more on the summary of results. Based on our review, Sarnia and St. Clair are expected to require expansions to their existing settlement boundaries in order to meet future residential land needs. On behalf of Chippewas of the Thames First Nation, any proposed boundary expansion raises important questions about the long-term health and use of the land, water, and ecosystems, as well as the potential impacts on treaty rights, harvesting and cultural areas. If an expansion is required, we expect that our First Nation would be engaged and consulted throughout the process.

The report also notes that some municipalities face shortages in industrial, commercial, and institutional lands. These needs can be met by redesignating land within existing settlement boundaries rather than expanding outward. This approach aligns more closely with our principles of minimizing land disturbance, prioritizing efficient use of already-impacted areas, and protecting remaining natural and agricultural lands.

Thank you for providing COTTFN with the opportunity to review the draft report. I have attached our Consultation Protocol for your reference as well as a user guide for the Community Knowledge Keeper which is a consultation portal that we use to receive consultation requests, updates etc..

We look forward to continuing this open line of communication.

Thank you,

Fallon Burch

Consulting Coordinator

Chippewas of the Thames First Nations

12. PAULO CORTELLAZZI – COMPASS GREENFIELD DEVELOPMENT

From: Paulo Cortellazzi

Sent: Friday, March 13, 2026 11:13 AM

To: Planning.Public <planning@county-lambton.on.ca>

Subject: Inquiry - Current Official Plan Review

Dear County of Lambton Planning Team,

I would like to ask a few questions about the County of Lambton's current official plan review process. Please advise:

- What stage of the process are you currently in?
- Has a draft land use designation schedule been produced yet?
- Are any changes to land use designations expected, and will they result in less land being designated as Industrial?

Thank you for your time.

Best regards,

Paulo Maia Cortellazzi

Junior Project Developer

Compass Greenfield Development

13. TOWN OF PLYMPTON-WYOMING COUNCIL

[See Attached: Comment 13]

Council encourages use of underutilized industrial lands to accommodate growth. They note a lack of commercial lands around Camlachie. They seek clarification on industrial land need projections. They encourage policies promoting greater density and residential unit mix, incentives for affordable housing, and agricultural diversification.

14. WARWICK TOWNSHIP

From: Trevor Jarrett <TJarrett@warwicktownship.ca>
Sent: Wednesday, October 22, 2025 11:16 AM
To: Official Plan Review/Update <opreview@county-lambton.on.ca>
Cc: Johan Chandy <Johan.Chandy@county-lambton.on.ca>
Subject: Housing numbers for the Township of Warwick

Hello folks,

Please see attached the proposed known residential developments for the Township of Warwick. There appears to be a significant disconnect to what is being presented in the OP. Please reach out to myself or Johan should you wish to discuss further.

Regards,

Trevor Jarrett, CAO/Treasurer

Township of Warwick

[See Attached: Comment 14 Table]

15. TOWN OF PLYMPTON-WYOMING

From: Adam Sobanski <ASobanski@plympton-wyoming.ca>
Sent: Thursday, January 22, 2026 1:24 PM
To: William Nywening <William.Nywening@county-lambton.on.ca>
Cc: Erin Kwarciak <EKwarciak@plympton-wyoming.ca>
Subject: County OP

Will,

During your presentation regarding the Housing Needs Assessment, Council asked me to provide comments on some inaccuracies observed in the mapping. Please see attached with my comments.

Have a great day.

Sincerely,

Adam Sobanski, CET., GDPA.

Chief Administrative Officer

Town of Plympton-Wyoming

[See Attached: Comment 15 Mapping]



Will Nywening, BA Urban Dev., RPP, MCIP
Senior Planning Official, Development Services
County of Lambton
Will.nywening@county-lambton.on.ca
519-845-0809 x 5350

Arcadis Canada Inc.
55 St Clair Ave. W.,
Toronto, Ontario T2E 8W1
Canada
Phone: 416 596 1930
www.arcadis.com

Date: December 9, 2025

Our Ref: 30257110

**Comments on the County of Lambton's 2025 Land Needs Assessment –
Client: Mark and Matt Huzevka**

Dear Mr. Nywening,

Arcadis Professional Services (Canada) Inc. ("Arcadis") has been retained by Mark and Matt Huzevka ("Client") to review and provide commentary on the County of Lambton's growth management work and Land Needs Assessment ("LNA"), which was completed as part of the County's ongoing Official Plan Review process. This memo provides a summary of Arcadis' key findings and questions as it relates to the need for additional land to accommodate the forecasted growth within the City of Sarnia.

Based on Arcadis' assessment, it is our opinion that 42-137 ha of additional land could be required to accommodate the forecasted growth in Sarnia – in addition to the 110 ha already identified by the County and the 77 ha identified by the City in their 2022 growth management report.

Background:

The Client owns the lands municipally known as 6941 Waterworks Road in the City of Sarnia ("site" or "subject site"). The site is currently outside of the settlement area boundary and is approximately 75 ha (185 acres) in size. Additional details can be found in **Appendix A**.

The City of Sarnia's "Comprehensive Review: Growth Management Recommendations (January 28, 2022)" completed by urbanMetrics ("City's 2022 GM Report") identified the need for 77 gross hectares ("ha") of additional residential land within Sarnia to meet its' 2046 population growth. This additional residential land would be accommodated through an employment area conversion. Building upon the findings of the 2022 City GM Report, the "Lambton County Official Plan Review – Land Needs Assessment (September 29, 2025)" completed by Parcel Economics ("County's 2025 LNA") determined that an additional 110 gross ha of residential land, in addition to the 77 ha identified by the City, was required to meet the residential forecast over the 2051 planning horizon. The County's 2025 LNA did not identify where this additional 110ha should be accommodated.

Key Findings & Questions:

Arcadis has taken a conservative approach to assessing the County's 2025 LNA. While we generally support the findings and the identification of the additional land needs to accommodate future residential growth in Sarnia to 2051, Arcadis has some outstanding questions and comments which could potentially yield further land requirements in Sarnia. These questions/comments are presented for further consideration by the County below:

1. **Sarnia's Growth Allocation:** Sarnia is designated as an Urban Centre within the County's Official Plan.¹ However, the County's 2025 LNA allocates less population to Sarnia (50%) than was forecasted in the City's 2022 GM Report (62%), as well as the County's 2025 LNA's own household growth (53%). It's our understanding that this lower allocation to Sarnia was based on stronger recent growth in surrounding areas due to the availability of existing vacant settlement area land compared to Sarnia. Acknowledging there are other locations within Lambton County for growth, it is Arcadis' opinion that an allocation of 55% is more representative of Sarnia's current and future status, as per policy, which identifies it as the County's largest growth center, and where existing and future services and community amenities are located. Considering this higher population growth allocation, which better reflects Sarnia as the County's primary growth centre, **an additional 42 gross ha (21 net ha) of land would be required.** It is also noted that the limited recent growth with Sarnia can be partially attributed to a lack of new development options, and therefore additional land, which subsequently increases the opportunity and mix of units, would help support the policies that identify Sarnia as the County's growth centre.

2. **County's 2025 LNA Unit Shift & Re-allocation:** In arriving at the 110 ha of additional land required in Sarnia to accommodate the growth forecast to 2051, the County made two significant shifts in the unit mix which underpinned the findings of the final land need for the City. The first shift is observed in a unit mix adjustment between the initial household growth by housing type (Figure 4.1) and the final unit breakdown for Sarnia (Figure B-35), which saw a shift of approximately 1,500 singles/semis to townhouses and apartments. The second shift, as noted in Figure B-35, reallocates 589 singles/semis to apartments. In our review of the document, the justification for both reallocations has not been provided and could impact the final land requirements in the City.

It is our understanding that the County's consultants generally followed the Province's land needs projection methodology guidelines to establish the population, housing and employment forecasts for the City. Understanding that this methodology considers housing propensities by unit type and other market considerations, the County should provide further rationale as to why the final projections for Sarnia have departed significantly from the initial forecasts in Figure 4.1.

This shift in unit mix could underestimate the amount of land that is required. In this case, the delta between the final stated land need (i.e. 110 ha), and the amount of land that would be required to accommodate the original unit breakdowns in Figure 4.1 and the 589-unit shift deficit, is **approximately 95 ha.**² Arcadis would appreciate the opportunity to engage with the County to better understand why and how these reallocations were undertaken.

3. **Missing Supply Mapping & Accommodation of Future Commercial and Institutional Land Needs:** There is no mapping for the Sarnia area included in the County's 2025 LNA, which makes it difficult to understand what lands were included in the available supply, including the potential inclusion of identified employment land conversions to meet growth including potential refinement to required buffers. The County's 2025 LNA also did not consider existing vacant land supply within Sarnia against its' estimated demand of 109ha for Institutional uses and 26ha for Commercial uses within the City, which could result in additional land requirements. Can the County provide the appropriate documentation to allow for a fulsome analysis of land need?

¹ As per Map 1 – Growth Strategy of the County of Lambton Official Plan.

² Based on a 67.55ha delta between the original unit breakdown and proposed unit breakdown, and a 27.52ha delta due to the reallocation of 589 singles/semis to apartments.

Will Nywening
County of Lambton
December 9, 2025

Based on the information above, it is Arcadis' opinion that between **42-137 ha** of additional land could be required to accommodate the forecasted growth in Sarnia, in addition to the 110 ha already identified by the County and the 77 ha identified by the City in their 2022 GM report. The quantum of this additional land requirement is dependent on any potential changes to the County's 2025 LNA.

Arcadis is happy to continue dialogue with the County and its' consultant team to identify opportunities for refinement to future land requirements within Sarnia.

Sincerely,
Arcadis Canada Inc.

A handwritten signature in black ink, appearing to read 'Matthew Heather', with a stylized, flowing script.

Matthew Heather, MCIP, RPP, PLE
Associate Principal – Manager, Planning

Email: matthew.heather@arcadis.com
Direct Line: 416 596 1930

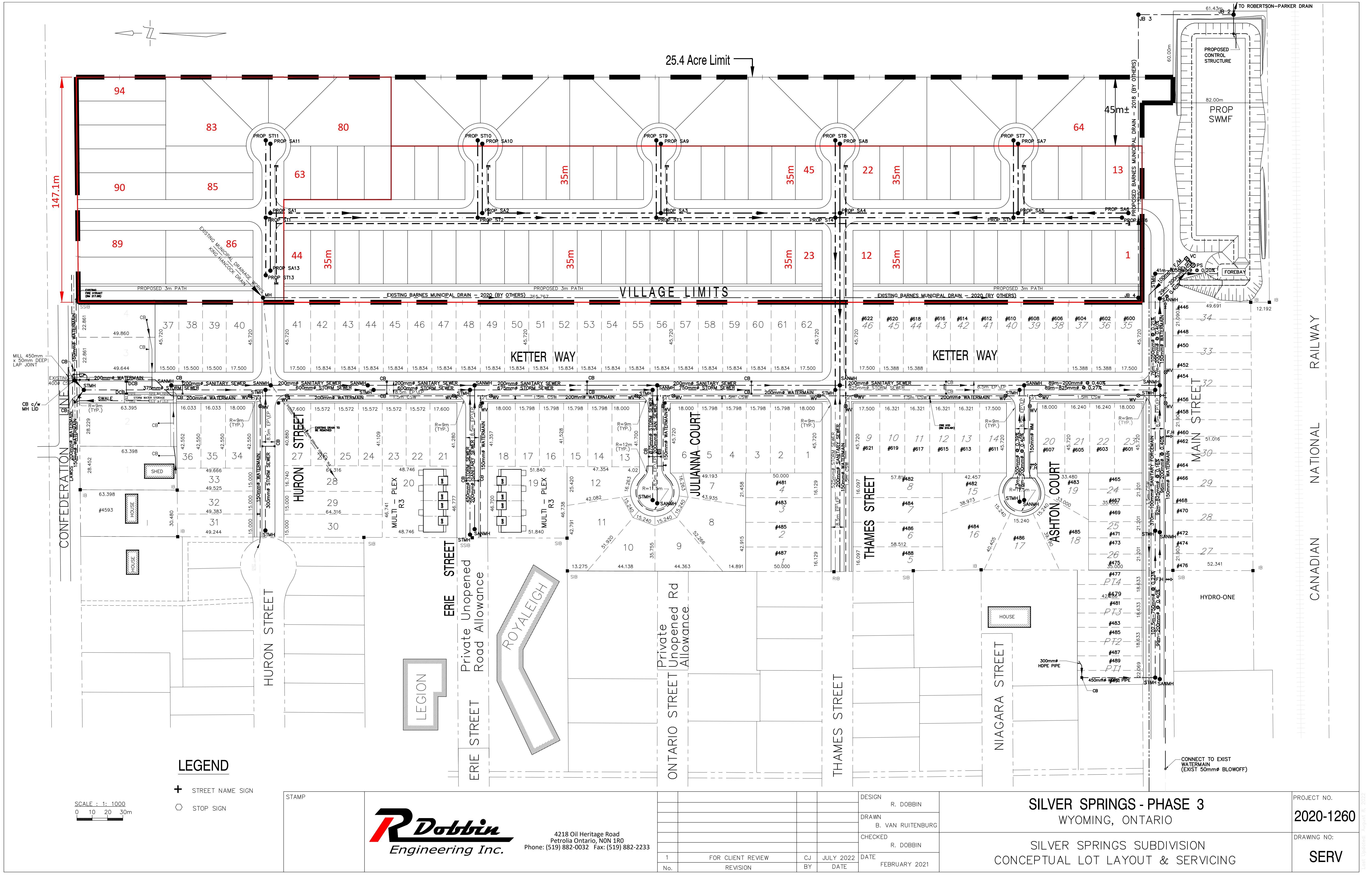
CC. Mr. Mark and Matt Huzevka

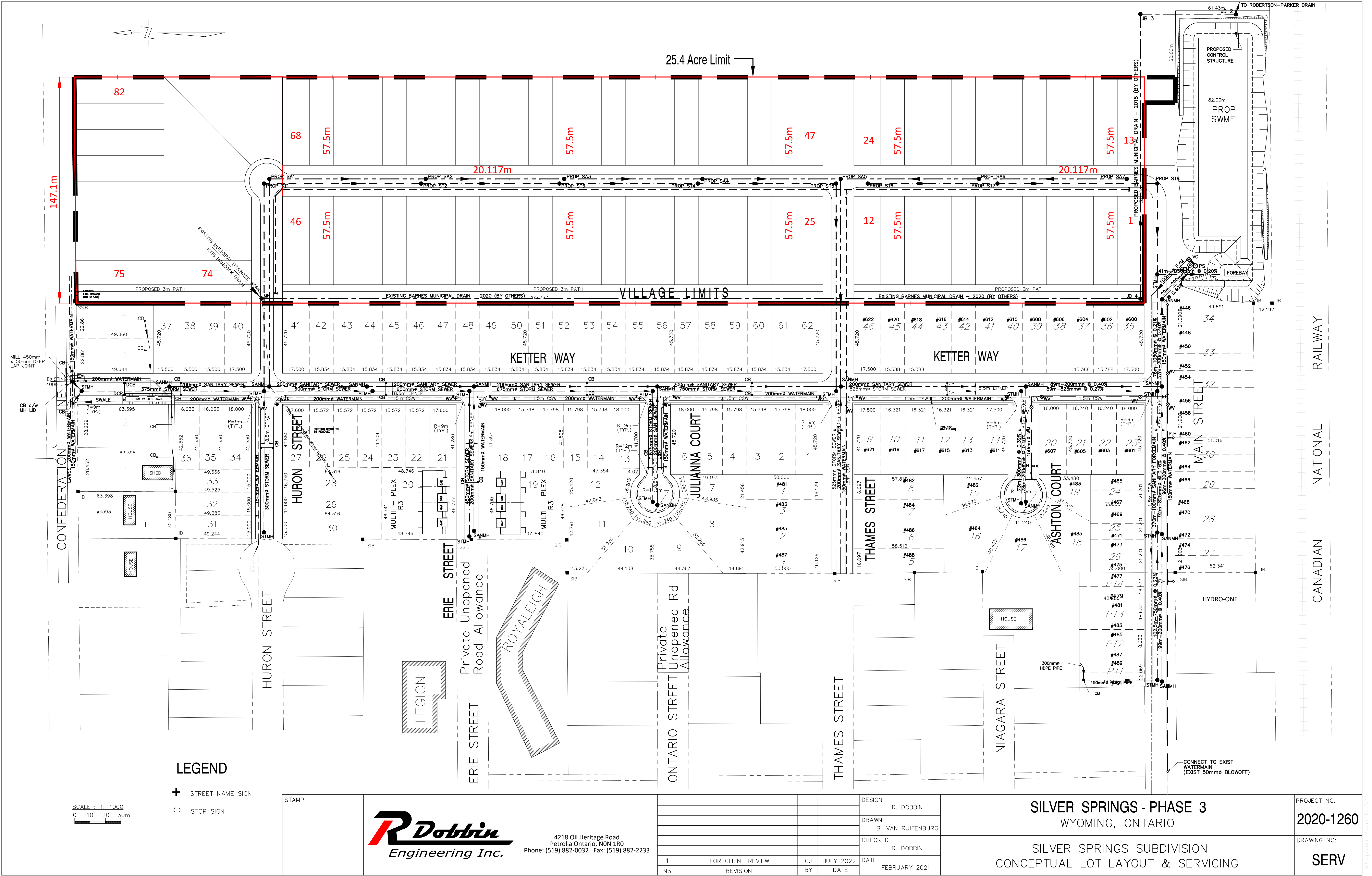
Appendix A – Site Description

The subject site is approximately 75ha (185 acres) located at the southwest corner of Waterworks Road and Lakeshore Road in the City of Sarnia, Lambton County. Based on current and proposed floodline conditions (after modifications to the Waterworks Road culvert and Homer Watson Natural Trail), the developable area of the site is a total of 1.90ha and 4.07ha respectively entirely to the north of Cow Creek. Based on current ongoing environmental work to refine the site's floodline based on a two-zone categorization, it is estimated that the developable area under current conditions is a total of 37.97ha – 7.21ha north of the creek and 30.76ha to the south of the creek. Under proposed conditions, it is estimated that the developable area is a total of 44.86ha – 8.19ha north of the creek and 36.67ha south of the creek. The site is currently vacant, and is adjacent to the Huron Oaks Golf Course, associated residential dwellings, and a retail strip mall on the north side of Lakeshore Road.

Figure 1 – Subject Site Aerial





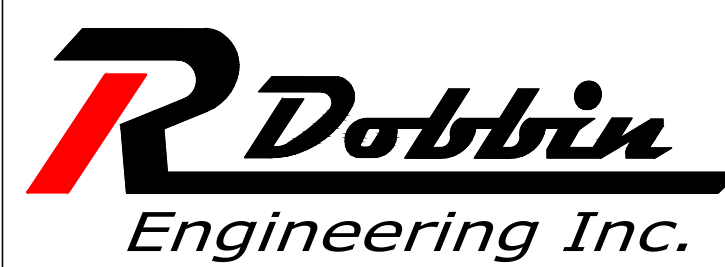


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4218 Oil Heritage Road
Petrolia Ontario, N0N 1R0
Phone: (519) 882-0032 Fax: (519) 882-2233

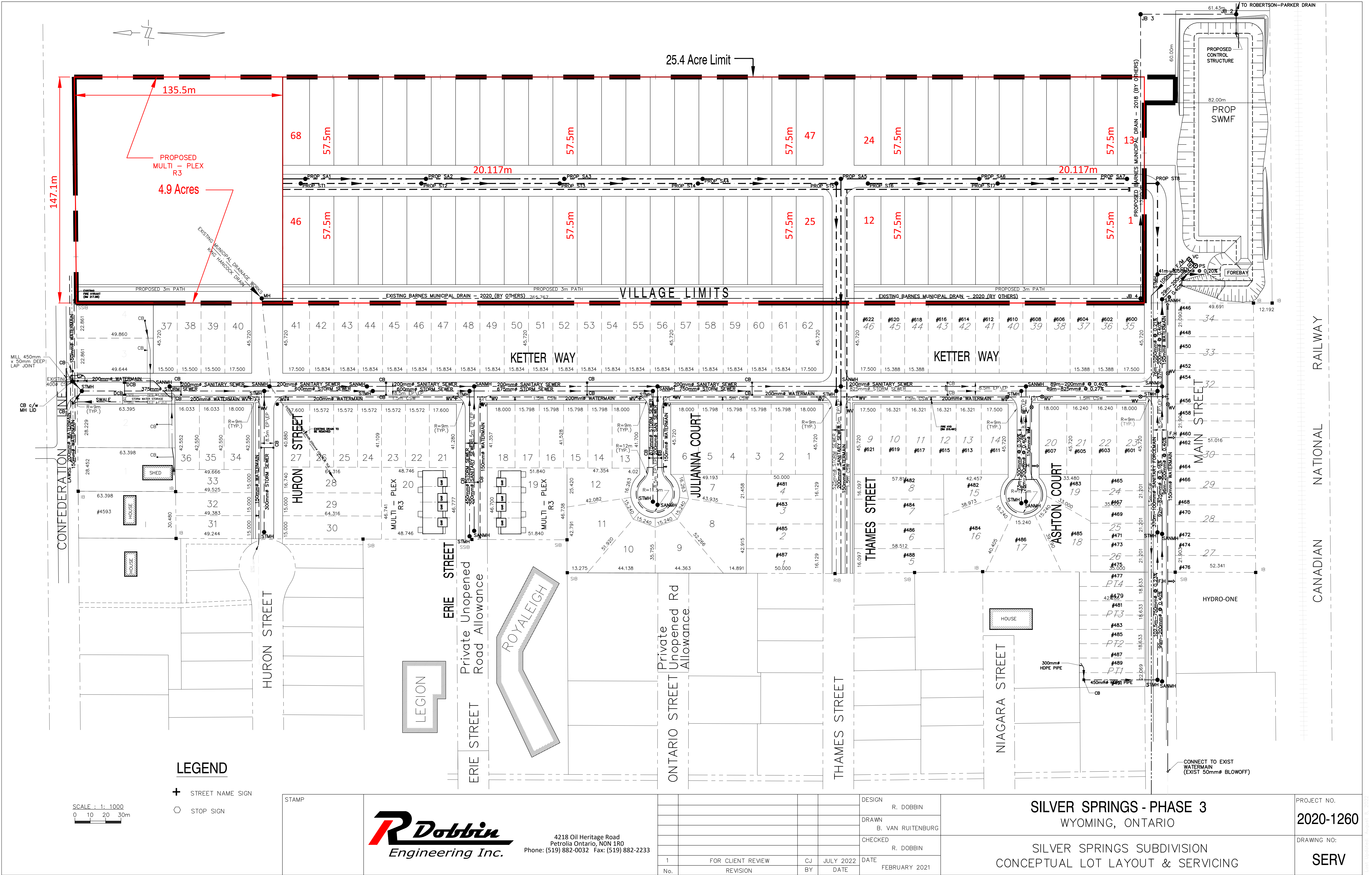
1	FOR CLIENT REVIEW	CJ	JULY 2022	DATE	FEBRUARY 2021
No.	REVISION	BY	DATE		

DESIGN	R. DOBBIN
DRAWN	B. VAN RUITENBURG
CHECKED	R. DOBBIN
DATE	FEBRUARY 2021

SILVER SPRINGS - PHASE 3
WYOMING, ONTARIO

SILVER SPRINGS SUBDIVISION
CONCEPTUAL LOT LAYOUT & SERVICING

PROJECT NO.	2020-1260
DRAWING NO.	SERV



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R Dobbin
Engineering Inc.

4218 Oil Heritage Road
Petrolia Ontario, N0N 1R0
Phone: (519) 882-0032 Fax: (519) 882-2233

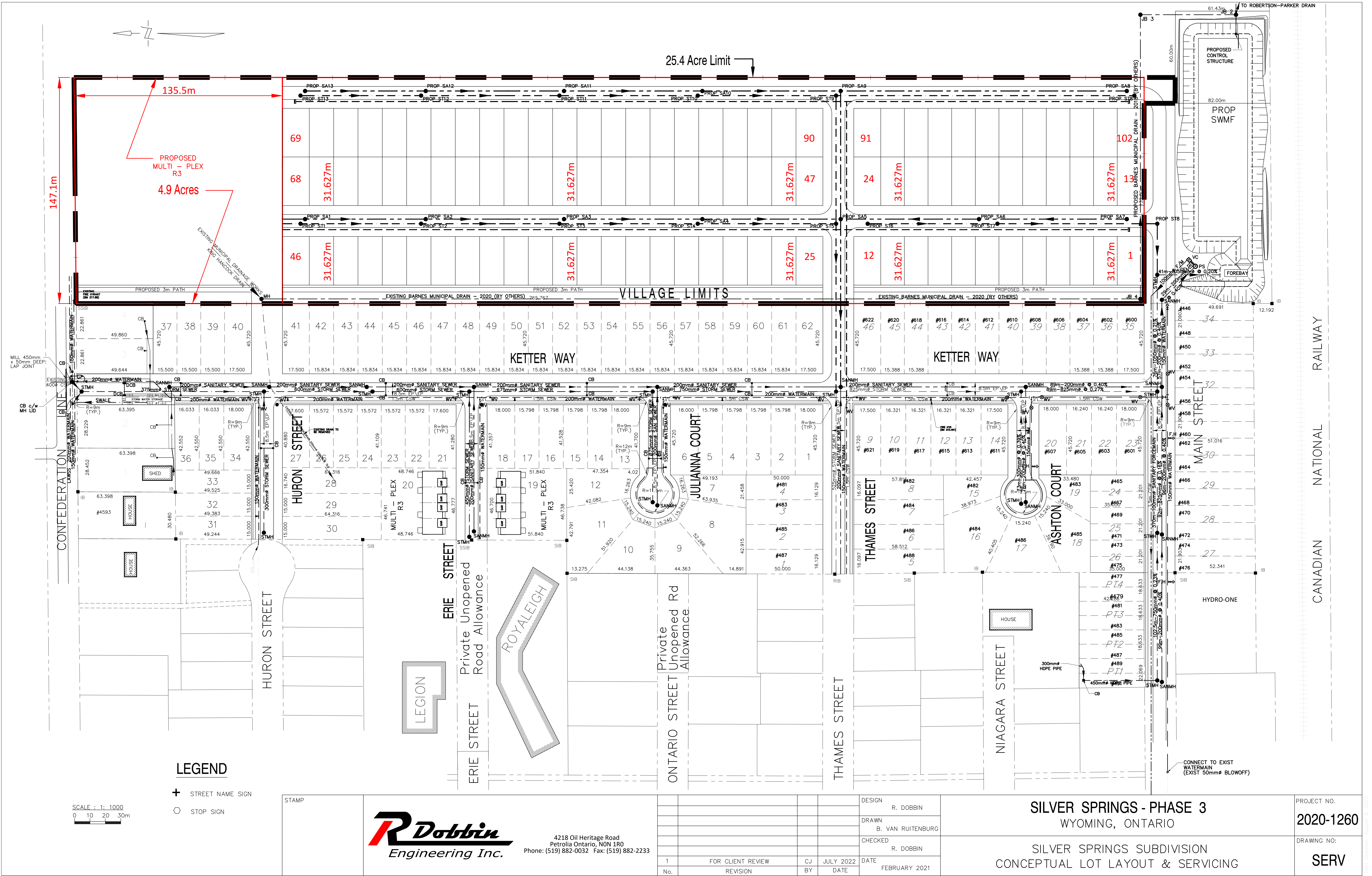
1	FOR CLIENT REVIEW	CJ	JULY 2022	DATE	FEBRUARY 2021
No.	REVISION	BY	DATE		

DESIGN	R. DOBBIN
DRAWN	B. VAN RUITENBURG
CHECKED	R. DOBBIN
DATE	FEBRUARY 2021

SILVER SPRINGS - PHASE 3
WYOMING, ONTARIO

SILVER SPRINGS SUBDIVISION
CONCEPTUAL LOT LAYOUT & SERVICING

PROJECT NO.
2020-1260
DRAWING NO:
SERV



Parcel

Figure B- 13
Errol Village Residential Supply Map



Figure B- 15

Lakeshore Development Area 2 Residential Supply Map



December 12, 2025

The Corporation of the County of Lambton
Development Services Department
798 Broadway Street, Box 3000
Wyoming, ON N0N 1T0
Via email: opreview@county-lambton.on.ca

To Whom It May Concern,

urbanMetrics inc. has been retained by Southside Group (“the proponent”), owner of lands at the northwest corner of Bonnie Doon Road and Queen Street in the Town of Plympton-Wyoming (“the Subject Lands”), to conduct an independent review of the Lambton County Land Needs Assessment (“LNA”) prepared as part of the County’s Official Plan Review. Our mandate is to evaluate the LNA’s methodology, assumptions, and conclusions, and determine whether they accurately assess Plympton-Wyoming’s long-term need for residential land.

This letter identifies questions and issues that warrant clarification or supplemental analysis to strengthen the County’s growth management framework and support the implementation of the County Official Plan at the local municipal level.

Our review focuses on four areas:

- Agricultural lands and development feasibility;
- Regional market dynamics, including intensification assumptions;
- Implications of the 2051 time horizon; and
- Assumptions regarding non-permanent residents and seasonal demand.

Summary of Strategic Questions

The LNA generally applies standard methodology and aligns structurally with the Provincial Planning Statement, 2024 (“PPS”). However, in our opinion, several areas require further consideration. Three overarching questions guide our analysis:

1. How has development feasibility or readiness been incorporated into the land supply evaluation?
2. Why was the assessment conducted separately for each local municipality, and how are regional market dynamics considered in the estimated land needs and recommended boundary expansions?

3. How do time horizon assumptions affect the County and local municipalities' ability to maintain a PPS-compliant supply of serviced land?

Agricultural Land & Feasibility

The LNA identifies that a substantial portion of the residential supply in Plympton-Wyoming and other municipalities consists of agriculturally designated land within settlement areas or vacant designated lands with no development activity. The LNA acknowledges that these agricultural-designated parcels may create “imbalances in the housing market,” but does not provide criteria for determining their development readiness.

The LNA does not document factors such as servicing status or priority, phasing, or capital planning; landowner intent or development motivation; parcel fragmentation; assembly requirements; environmental or natural heritage constraints; or alignment with historical absorption rates.

Without any of this information, it is difficult to determine whether these lands will realistically transition to residential uses over the planning horizon. As noted in the LNA, if these parcels do not develop, practical shortages will emerge even where the LNA identifies a technical surplus.

Overall, greater clarity regarding how agriculturally designated parcels were evaluated for inclusion would strengthen the LNA's conclusions.

Regional Market Dynamics

The LNA is based on a projection framework that models each local municipality separately and then aggregates the results at the County level. This approach does not reflect the broader regional housing market in which residents move freely across municipal boundaries. Under PPS 2024, coordinated planning within a regional market area is prioritized to acknowledge these cross-boundary social and economic linkages. Statistics Canada's definition of the Sarnia Census Agglomeration (“CA”) reinforces this perspective, identifying Sarnia, Plympton-Wyoming, and St. Clair as part of the same economic area.

This regional context is essential for understanding long-term housing demand. Areas with Lake Huron frontage continue to attract both permanent and seasonal buyers seeking a high-amenity environment. When the LNA evaluates supply and demand separately for each municipality, the result is a set of recommended

settlement boundary expansions driven by administrative boundaries rather than actual market preferences.

Sarnia's Role in County-Wide Land Needs

As the County's largest urban municipality, Sarnia plays a significant role in shaping housing outcomes. The LNA relies on the assumptions and household projections in the Sarnia Official Plan, which assumes the achievement of a policy-driven intensification target developed under a different policy and market environment. This policy-led shift in structural-type demand is shown in Figure B-35 and reallocates 589 single- and semi-detached units to high-density forms. With an estimated intensification supply of 1,980 units compared to the total high-density demand of 2,381 units, a shortfall of 401 units remains.

While part of this gap may be met through redevelopment, the implications of this unmet demand are not incorporated into the LNA's land budgeting exercise. Using the LNA's density assumptions, these reallocated or unmet units would equate to 78.4 gross hectares of additional land need. This is a material omission that directly affects the land needs calculation for Sarnia and, when considered for the broader market area, impacts the County-wide expansion recommendations.

Demand by Housing Type

The LNA indicates that the Metroeconomies models used for each municipality incorporate headship rates and structural preferences to project unit demand for low-, medium-, and high-density housing. However, no structural-type projections are disclosed. Without this information, it is challenging to assess whether the LNA's unit forecasts reflect demonstrated consumer demand.

When combined with the regional market context, this omission becomes more consequential. If households prefer lower-density, lake-oriented communities within Lambton, higher-density apartment development in Sarnia cannot reasonably substitute for this form of demand. These considerations highlight a need for greater transparency regarding how structural-type demand has been modelled, underlining the relationship between intensification units in Sarnia and lower-density demand in other municipalities, and whether the projected supply can realistically satisfy both consumer preferences and PPS requirements.

A more comprehensive approach would be to project total County-wide demand for each dwelling type and then allocate these units among local municipalities

based on development activity, supply potential, and local trends, while maintaining consistency with regional market dynamics.

Time Horizon & Implementation Challenges

The LNA assesses population and housing needs to 2051, based on a 30-year horizon from a base year of 2021. Although this base year is nearly 5 years old, it remains consistent with provincial guidance. However, once the County adopts the new Official Plan and lower-tier municipalities bring their own Official Plans into conformity, the period remaining until 2051 will be less than 25 years.

As the PPS 2024 requires municipalities to plan for a minimum of 20 years, maintain a 15-year supply of designated land available for development, and a three-year supply of available and serviced land, the County and lower-tier municipalities will have a narrow window to ensure alignment with the PPS. This can lead to irregular phasing of subsequent upper-tier and lower-tier Official Plan Amendments and the potential for cross-jurisdictional conflict.

This situation reinforces the importance of incorporating market and feasibility factors into the LNA to ensure that the County and its lower-tier municipalities understand which lands can realistically be developed within a given timeframe. As is permitted by the PPS, it would be prudent to extend the planning horizon to 2056 to minimize the potential for implementation and phasing challenges.

Non-Permanent Residents

The LNA incorporates an analysis of seasonal dwellings and projects future demand based on recent trends. For Plympton-Wyoming, the LNA assumes no future net demand for seasonal housing.

However, it is important to highlight future housing pressures that could arise from an alternative interpretation:

- The pandemic-influenced period saw a decline in seasonal occupancy in “traditional” recreational property markets, with residents of larger urban areas moving into less densely populated areas during the pandemic. This phenomenon has shown evidence of reversal in recent years.
- The longer-term decline in seasonal units and increase in persons per occupied unit may indicate that permanent residents are absorbing seasonal units due to limited new supply.

- Many other communities are experiencing continued pressure from seasonal buyers competing with permanent residents, consistent with broader long-term trends in recreational markets in Ontario.

Assuming zero future seasonal demand may understate total housing demand in Plympton-Wyoming. An approach that considers the potential for seasonal residents to absorb a portion of the new housing supply, for example, by maintaining the approximately 10% rate in the 2021 Census, would strengthen the County's understanding of long-term housing needs.

Conclusion

In our opinion, the LNA provides a reasonable technical foundation. However, by taking a separate approach for each municipality, not re-evaluating Sarnia's Official Plan targets in a significantly different policy and market context, not including background data on projections by structural type, and not evaluating the development readiness of agriculturally designated land, the LNA may be understating the County's greenfield land requirements. Clarifying these assumptions would materially strengthen the analysis.

We trust that these observations provide a constructive basis for dialogue with the County regarding long-term residential land needs in Plympton-Wyoming and highlight the potential impact of the LNA on the Subject Lands.

Regards,



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The Corporation of the County of Lambton
789 Broadway Street, Box 3000
Wyoming ON N0N 1T0

February 12, 2026

Re: County of Lambton Preliminary Land Needs Assessment Results

We are the Planners for J.N Ventures Ltd. et al., who has retained the services of A.J Clarke and Associates Ltd. to review and respond to the Preliminary Land Needs Assessment Results (LNA) prepared by Parcel Inc. and Metroeconomics Ltd. which will form the basis of a future Regional Official Plan Amendment (ROPA). Our understanding is that the intent of the Growth Strategy is to project into 2051.

J.N Ventures has land holdings within the LDA-1, LDA-2 and LDA-3 lands (the LDA Lands) identified and designated both in the Lambton County Regional Official Plan and Local Plympton-Wyoming Official Plan.

JN Ventures provides the following comments for review and consideration.

Plympton-Wyoming

We concur with the findings of the LNA which identifies that Plympton-Wyoming can accommodate future population projections within the existing urban boundary. The Parcel report identifies that Plympton-Wyoming will grow to a population of 12,320 by 2051 and expects that 1,445 new units (most of which will be in the form of Single Detached Dwellings) will be required to meet this expected growth.

J.N Ventures already owns lands that are designated and projected to assist in accommodating this growth to 2051. We concur with both municipal Staff and the findings contained within the LNA that no urban boundary expansion is warranted within Plympton-Wyoming.

We have also reviewed the Staff Report SR-25-247 dated December 9th, 2025 County of Lambton Preliminary Land Needs Assessment Results - Town of Plympton-Wyoming Comments and generally concur with the comments of contained within the staff report.

We would humbly request that municipal staff support any future residential housing policies that will encourage the continued construction of new dwelling units within the municipality and to adopt the future population and housing projections that will be implemented by the ROPA into the Plympton-Wyoming official Plan at the appropriate time. Further, J.N Ventures would appreciate the opportunity to review the LNA with municipal staff to identify opportunities to lift the existing caps on the number of units per year throughout the LDA Lands.



City of Sarnia

JN. Ventures has an interest in ongoing development within the boundaries of the City of Sarnia as the aforementioned LDA Lands are located near Bright's Grove and share a municipal boundary with the City of Sarnia.

Respecting the LNA we understand that the City of Sarnia is intended to grow by 15,773 persons by the year 2051. This correlates to an expected 6,543 new units required to be built to accommodate this expected growth. The LNA identified that this growth would be accommodated through 45% intensification rate with 55% of the units being greenfield units. The resultant land need based on the above was 110.5 ha of land to be brought into the urban boundary once vacant lands have been factored into the equation.

Our comments are as follows:

On page 31 of the LNA, the following footnote is included:

"Additionally, all lots below 200 square metres have been excluded from the land supply, as these existing lots within Urban Centres and Urban Settlements are considered to be too small to accommodate new dwelling units."

Please confirm whether any lots less than 200 m² contain single detached dwellings. As Staff are aware, per Section 34 (X) of the Planning Act, any existing urban tract of land is permitted to accommodate up to three (3) dwelling units. Regardless of the size of lot, the LNA should take into account that existing single detached dwellings, regardless of lot size, should be able to accommodate up to three dwelling units. Was this considered in the preparation of the LNA?

On page 31 of the LNA, the following footnote is included:

*"To prevent overestimating of the land supply, vacant designated lands exclude lands that are considered to be nondevelopable, such as the Natural Heritage System ("NHS") lands.
This includes lands designated Natural Heritage System ("NHS") Group A and Group B as defined on 8-1 and 8-2 of Lambton County Official Plan and Significant Woodlands are included under NHS Group B."*

Does the 110.5 ha. of land identified as being required for an urban boundary expansion factor in the Brights Grove Lands which are primarily designated NHS? Will NHS lands be identified as forming part of the Urban Boundary Expansion Area?

Area 2 Secondary Plan

Are staff able to confirm whether the lands identified within the City of Sarnia Official Plan identified as "Area 2 Secondary Plan" have been accommodated within the LNA. These lands are approximately 600ha in size and can accommodate much of the future residential land needs of the City.

Intensification

We would encourage staff to look at areas in which the rate of intensification can be increased from 45% to 60%. Reviewing existing local official plan policies and updating current and in effect Zoning By-laws can unlock greater potential for intensification within existing lands within the urban boundary.



Conclusion

We request to be notified of any new developments respecting the County of Lambton Land Needs Assessment and any future Regional Plan Amendments resulting from the LNA.

Respectfully,

Ryan Ferrari, MCIP, RPP

Senior Planner

A.J Clarke and Associates Ltd.

cc: JN Ventures Ltd. (email);
406 Farm Inc.;
3719 Queen Street Inc.;
3771 Queen Street Inc.;
Mr. Brad Zantingh;
2798847 Ontario Ltd;
Wilhelm Inc.

Legend

 Petrochemical Industrial OP Boundary

Vacant Properties - MPAC Designation

 Farm property without any buildings/structures

 Second tier vacant lot *

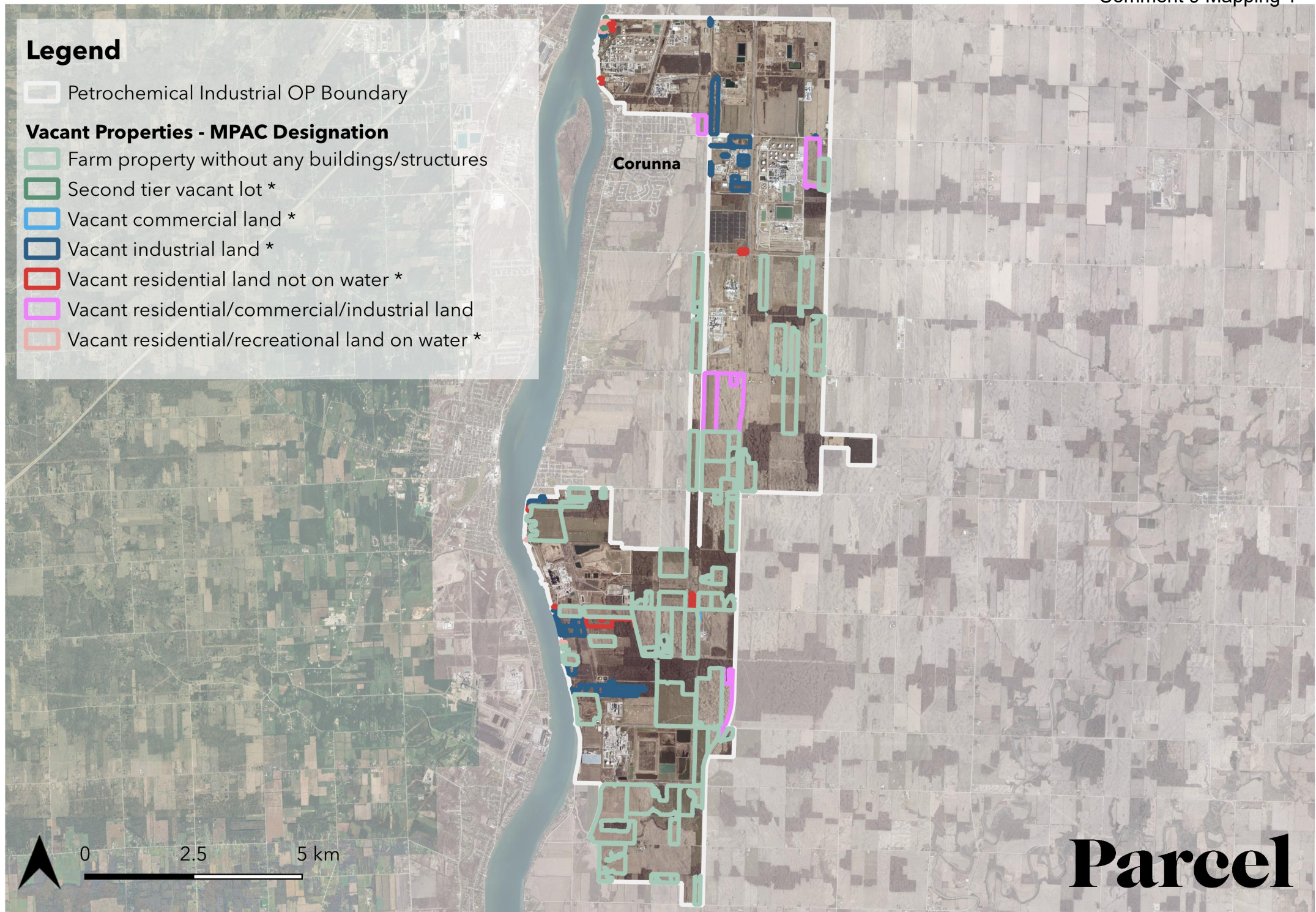
 Vacant commercial land *

 Vacant industrial land *

 Vacant residential land not on water *

 Vacant residential/commercial/industrial land

 Vacant residential/recreational land on water *



Parcel

Legend

-  Commercial
-  Industrial
-  Institutional
-  Mixed Commercial/Industrial
-  Mixed Use
-  Urban Settlement Boundary

Province of Ontario - SWOOP 2020



0

0.5

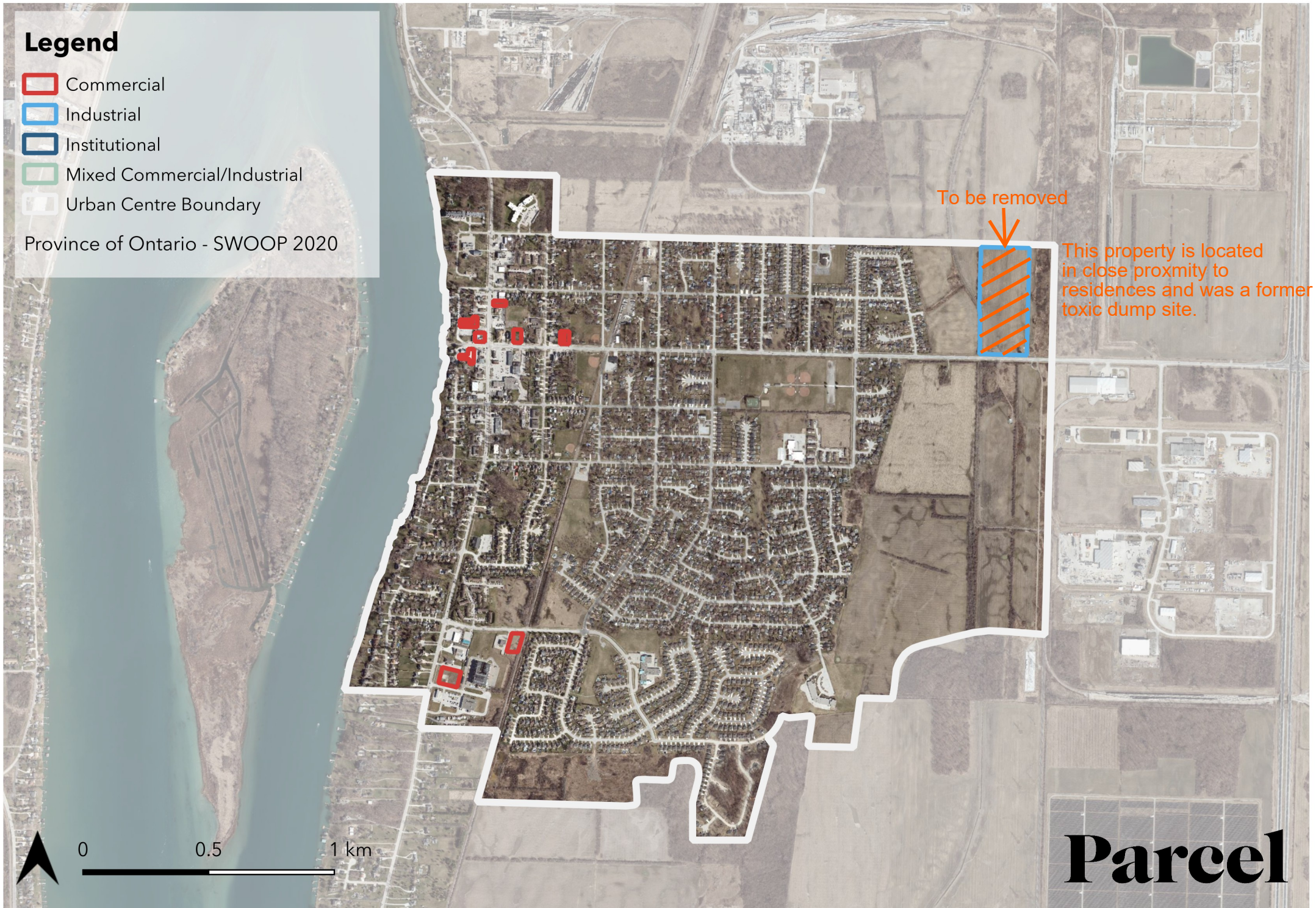
1 km

Parcel

Legend

-  Commercial
-  Industrial
-  Institutional
-  Mixed Commercial/Industrial
-  Urban Centre Boundary

Province of Ontario - SWOOP 2020



Legend

-  Commercial
-  Industrial
-  Institutional
-  Mixed Commercial/Industrial
-  Mixed Use
-  Urban Settlement Boundary

Province of Ontario - SWOOP 2020



0

250

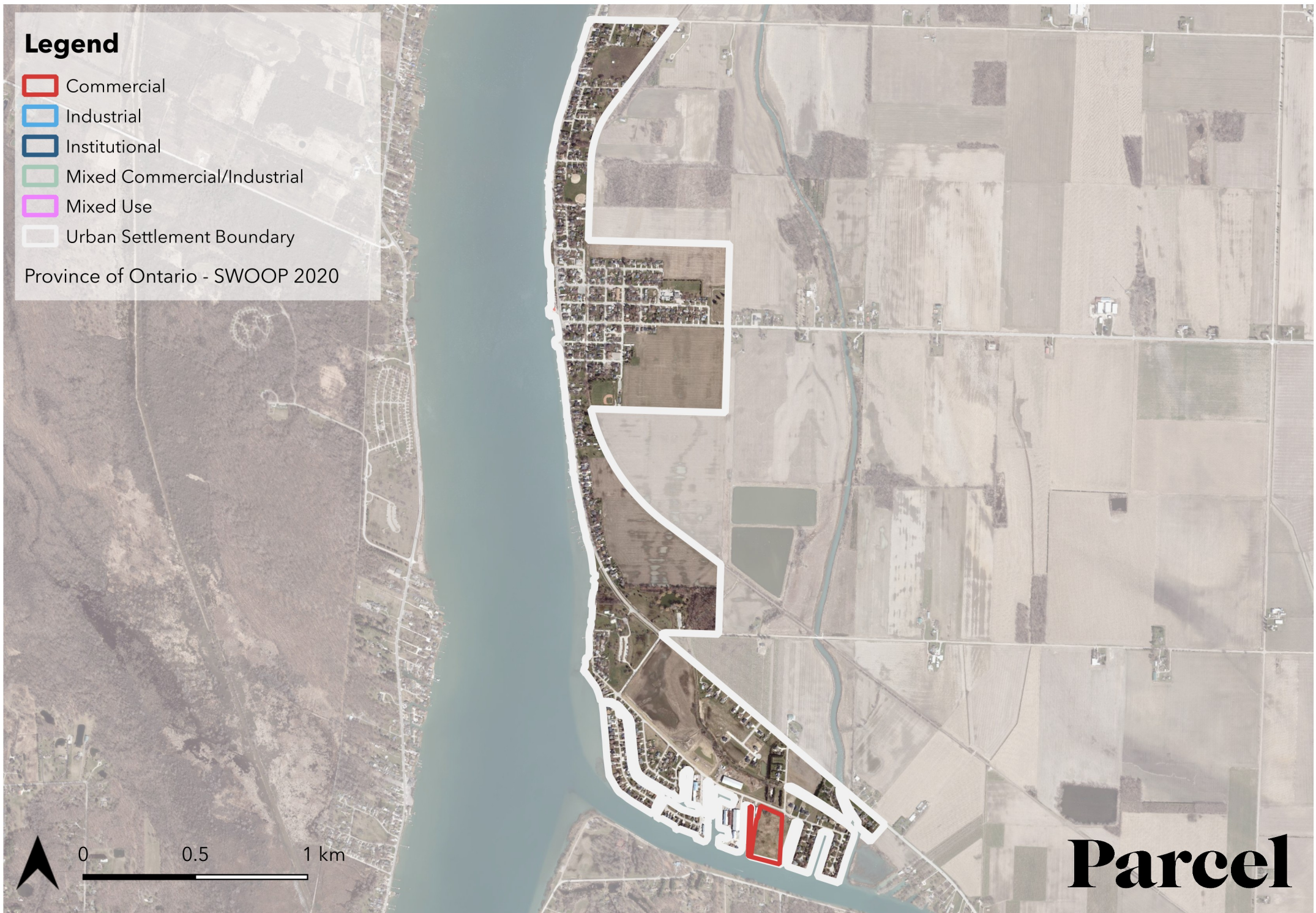
500 m

Parcel

Legend

-  Commercial
-  Industrial
-  Institutional
-  Mixed Commercial/Industrial
-  Mixed Use
-  Urban Settlement Boundary

Province of Ontario - SWOOP 2020



Legend

-  Commercial
-  Industrial
-  Institutional
-  Mixed Commercial/Industrial
-  Mixed Use
-  Urban Settlement Boundary

Province of Ontario - SWOOP 2020



Parcel

Legend

-  Application
-  Draft Approved
-  Registered
-  Other Vacant Designated Parcels
-  Urban Centre Boundary

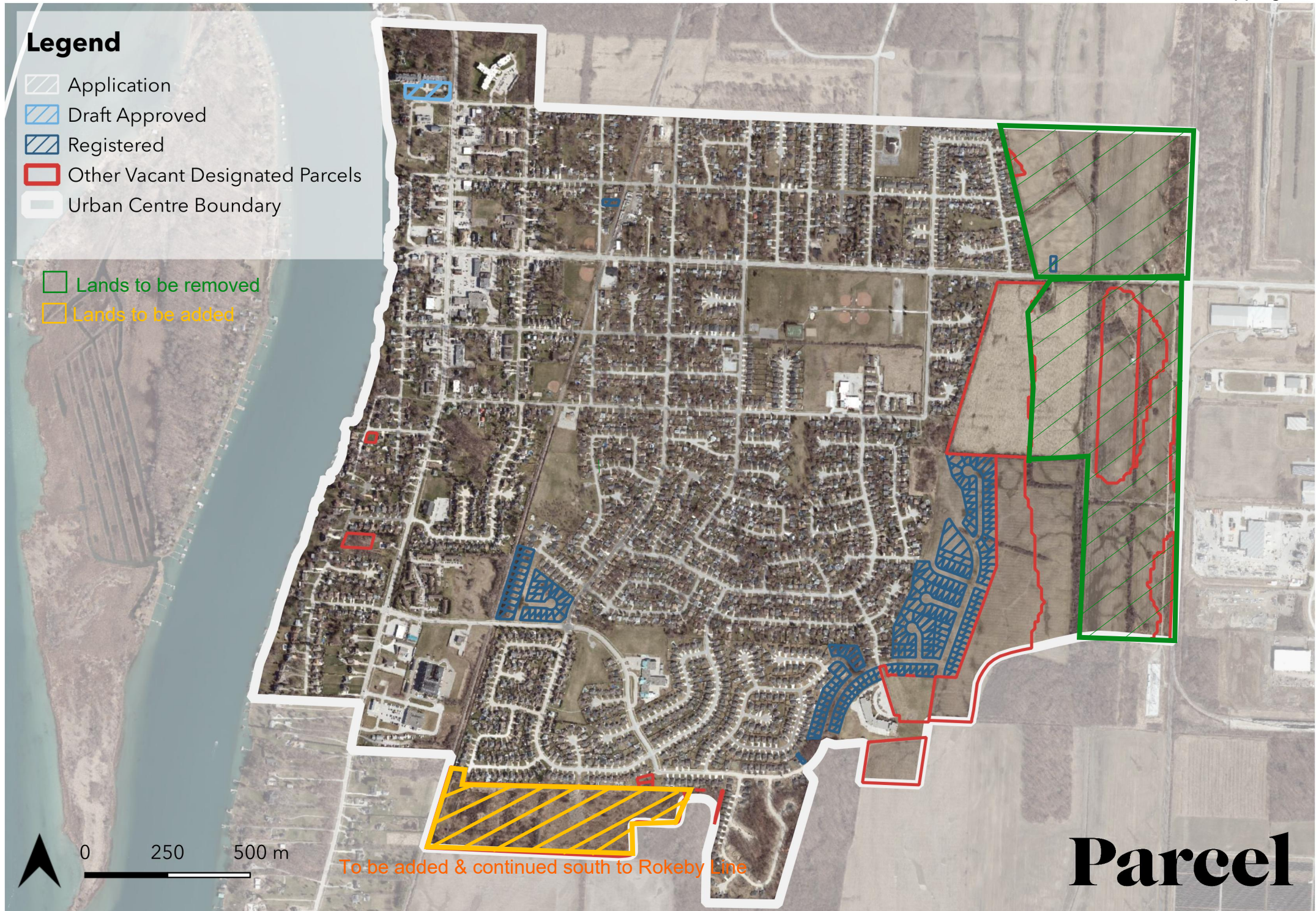
-  Lands to be removed
-  Lands to be added



0 250 500 m

To be added & continued south to Rokeby Line

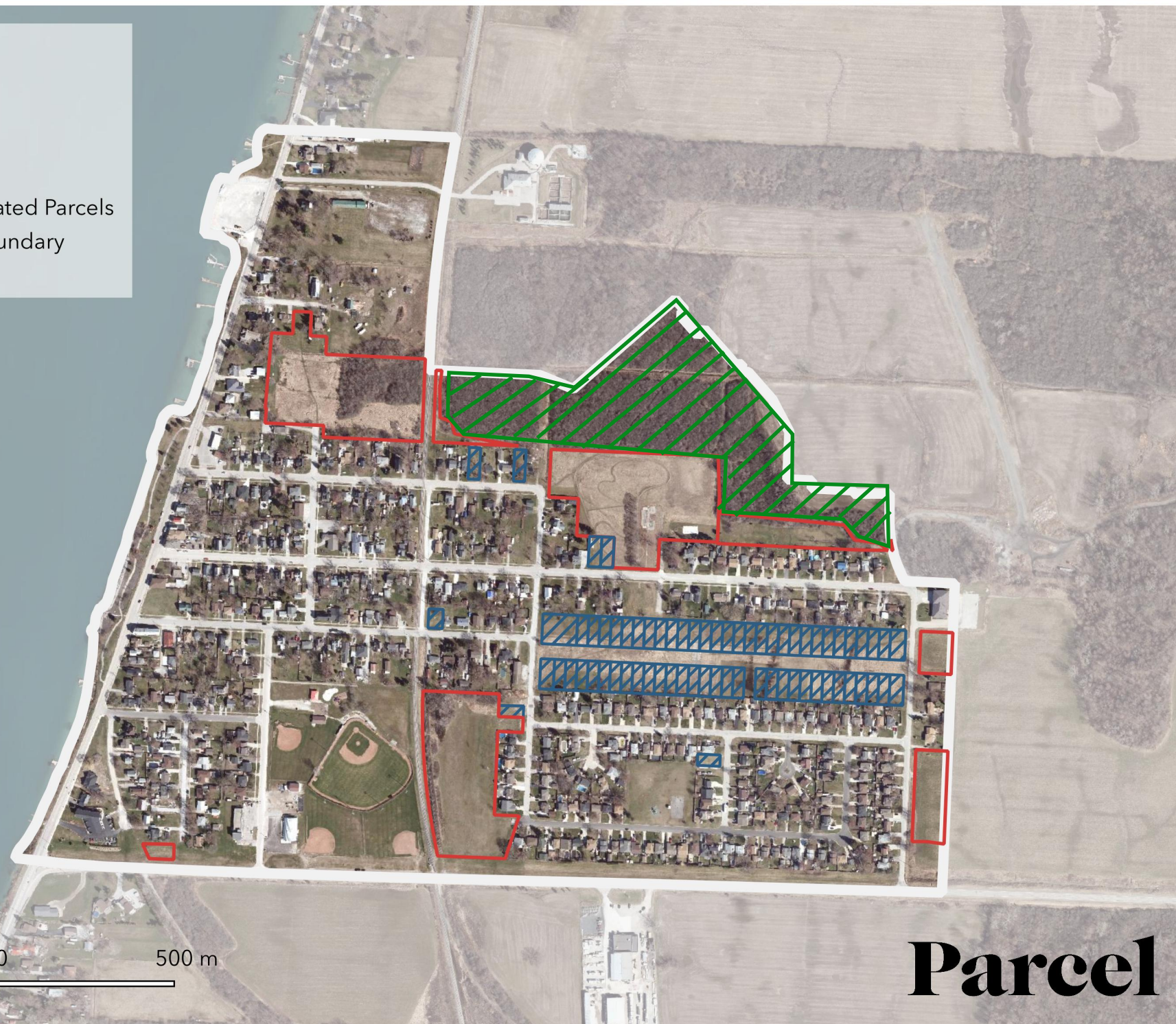
Parcel



Legend

-  Application
-  Draft Approved
-  Registered
-  Other Vacant Designated Parcels
-  Urban Settlement Boundary

 Lands to be removed



0

250

500 m

Parcel

Legend

-  Application
-  Draft Approved
-  Registered
-  Other Vacant Designated Parcels
-  Urban Settlement Boundary



0 250 500 m

Parcel

Legend

Application

 Draft Approved

 Registered

 Other Vacant Designated Parcels

 Urban Settlement Boundary

 Lands to be added



0

250

500 m

Parcel

Legend

-  Application
-  Draft Approved
-  Registered
-  Other Vacant Designated Parcels
-  Urban Settlement Boundary



0 250 500 m

Parcel

Legend

- Application
- Draft Approved
- Registered
- Other Vacant Designated Parcels
- Urban Settlement Boundary





STAFF REPORT

Report To: Mayor & Members of Council
Approved by: Erin Kwarciak, Clerk
From: Adam Sobanski, Chief Administrative Officer
Department: Corporate Services
Date: December 9, 2025
Re: County of Lambton Preliminary Land Needs Assessment Results - Town of Plympton-Wyoming Comments

RECOMMENDATION:

That the report by Adam Sobanski, Chief Administrative Officer, dated November 21, 2025 regarding a County of Lambton Preliminary Land Needs Assessment Results - Town of Plympton-Wyoming Comments be received and that Council endorses submitting the summarized comments to the County of Lambton.

BACKGROUND INFORMATION:

On November 24, 2025, Council received a presentation from the County of Lambton and their consultant, Parcel Economics, regarding the preliminary land needs assessment which will be used to update the County's Official Plan and each municipalities settlement area if needed. Links to the presentation and the County's Official Plan Review webpage are provided below for Council's reference.

Presentation: [https://plympton-wyoming.civicweb.net/document/97226/r%20\(2025-11-24\)%20Preliminary%20Land%20Needs%20-%20Plympton-W.pdf?handle=B41E2CBE45E44DFD80CBD919CC206A0E](https://plympton-wyoming.civicweb.net/document/97226/r%20(2025-11-24)%20Preliminary%20Land%20Needs%20-%20Plympton-W.pdf?handle=B41E2CBE45E44DFD80CBD919CC206A0E)

County's webpage: <https://www.lambtononline.ca/en/business-and-development/official-plan-review.aspx>

At the end of the presentation, Council were given the opportunity to ask questions and provide comments on the findings of the assessment.

DISCUSSION:

Staff have reviewed the recording of the Planning Council meeting on November 24, 2025 and can summarize Council comments as follows:

Affordable Housing:

Council acknowledges the County's position that affordability is primarily a policy matter rather than a land designation issue. However, we strongly encourage the County to incorporate clear policy language in the Official Plan to:

- Promote smaller lot sizes, semi-detached, and multi-unit dwellings.
- Explore incentive-based tools for developers to deliver affordable housing options.
- Align with provincial objectives on housing affordability.

Agricultural Employment:

While the assessment notes that agricultural employment is declining, Council requests that the County continue to monitor trends and consider policies that support agricultural diversification and value-added services to sustain the Town's rural economy.

Industrial Land Needs:

Council is concerned about the potential loss of prime agricultural land for industrial purposes. The Town requests that:

- A comprehensive review of underutilized lands within existing settlement areas before considering agricultural conversions.
- Exploration of mixed-use employment areas and adaptive reuse strategies to minimize farmland impact.

Commercial Lands in the Camlachie Area:

Council notes that there is a lack of identified commercial lands, particularly in Camlachie. Therefore the Town recommends:

- Greater emphasis on commercial development opportunities in growth areas around the Camlachie area.
- Consideration of policies that encourage value-added agricultural services and small-scale commercial uses on agricultural lands, consistent with the Provincial Policy Statement

Industrial Land Demand:

Council seeks clarification on the methodology driving industrial land projections and requests:

- Additional transparency on market demand assumptions.
- Consideration of regional economic trends and potential for remote work impacts on employment land needs.

FINANCIAL IMPACT:

There are no known direct financial impacts for the Town at this stage of the County of Lambton's Official Plan review.

POLICY IMPLICATIONS:

The lands needs assessment suggests that there is no need for expansion of the residential settlement area in the Town while there is a moderate need for commercial and industrial expansion. Given the comments and questions shared by Council at the November 24, 2025 Planning Council meeting, Council seems to be accepting of these findings at this time.

It should be noted that there has been a number of developers who have approached the Town in the past five years with a desire to carry out residential land development if their properties were to be included in the settlement area. If the County Official Plan review does not result in an expansion of the residential settlement area, those developers will not be able to develop. It should also be noted that a notable portion of the Town's undeveloped residential lands are held by one developer which could limit the diversity of development opportunities.

Comment 14 Table

Township of Warwick - Residential Developments

Developments in various states of approval	Stage	Single Family	Multi-Residential	Total
Heritage Creek	Draft plan of subdivision	61	109	170
SW Richfield Custom Homes Development	Draft site plan	54	88	142
SE Richfield Custom Homes Development	Pre-con completed	0	297	297
Rombouts Development	Pre-con completed			99
Countrywalk Estates - Phase 1	Pre-con completed	0	36	36
Total		115	530	744

Once the residential boundary is expanded:

Developments in various states of approval	Stage	Single Family	Multi-Residential	Total
Heritage Creek	Draft plan of subdivision	122	218	340
SW Richfield Custom Homes Development	Draft site plan	54	460	514
SE Richfield Custom Homes Development	Pre-con completed	0	297	297
Rombouts Development	Pre-con completed			99
Countrywalk Estates - Phase 1	Pre-con completed	0	36	36
Total		176	1011	1,286

Needs:

County expansion of OP residential boundary (in-process)

Funding such as the Housing-Enabling Water Systems Fund (HEWSF) as the infrastructure enhancements to support growth are significant/beyond our immediate means.

Figure B- 11

Blue Point / Sunset Acres Residential Supply Map



Figure B- 12
Camlachie Residential Supply Map

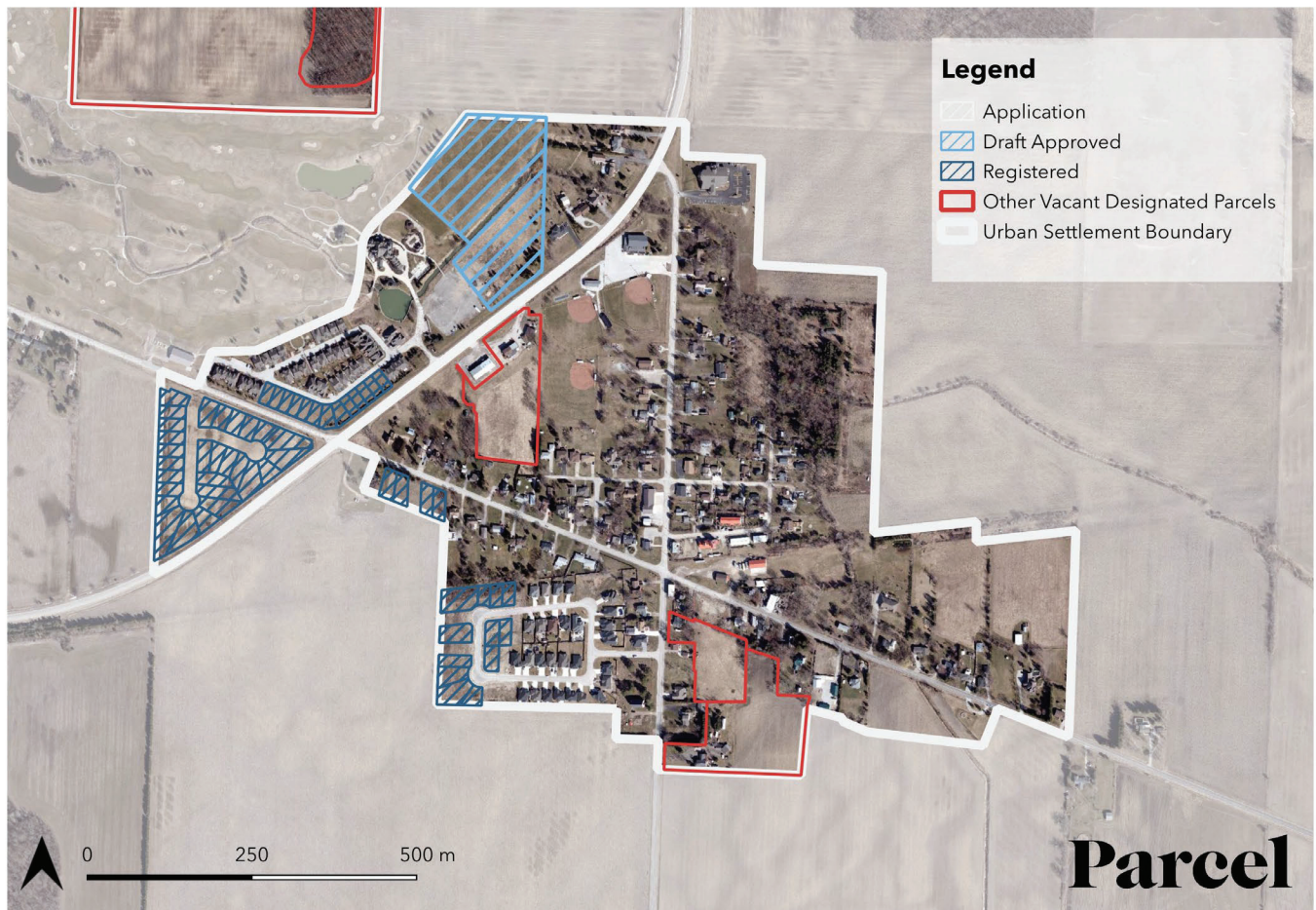


Figure B- 13
Errol Village Residential Supply Map

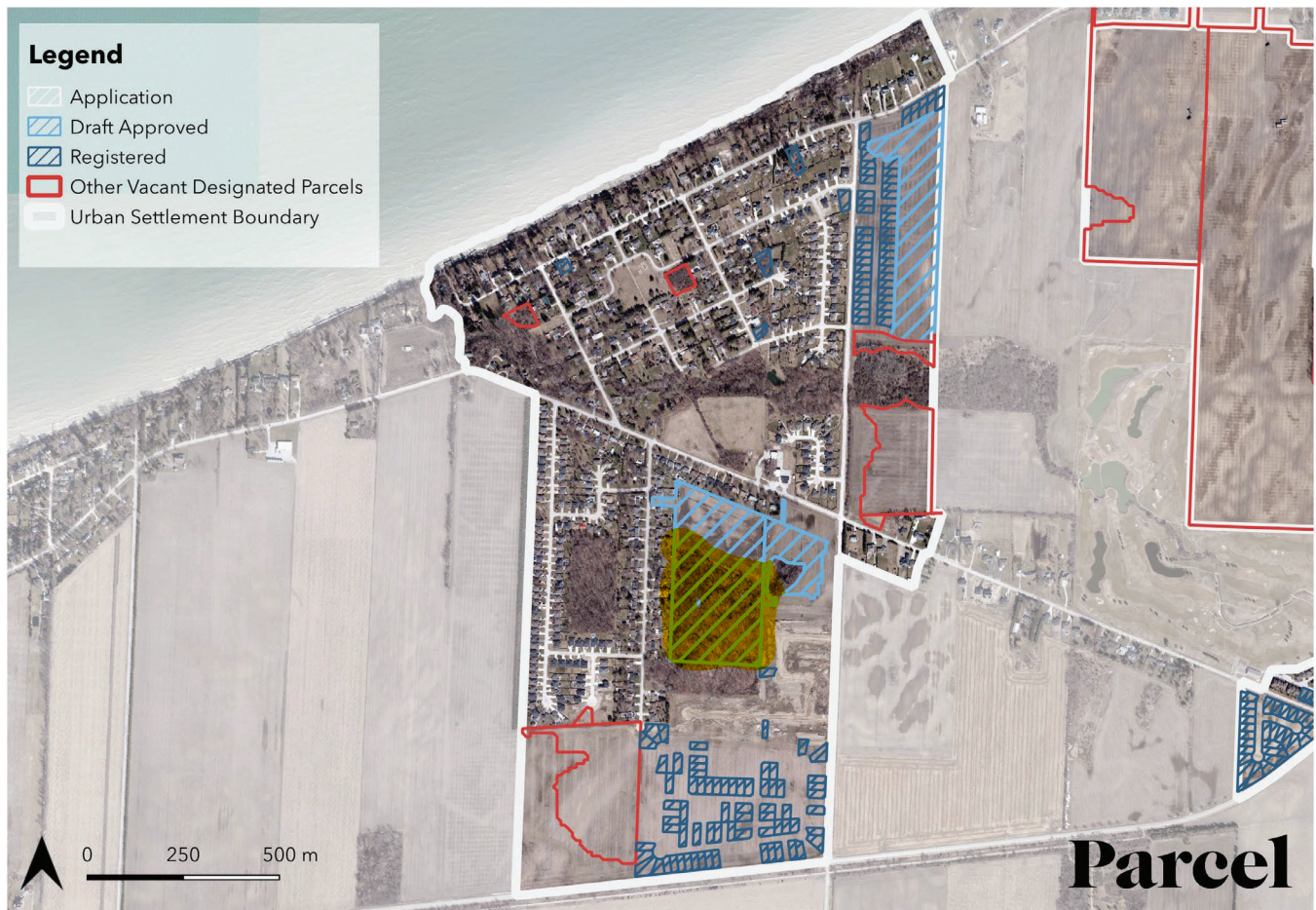


Figure B- 14

Lakeshore Development Area 1 Residential Supply Map

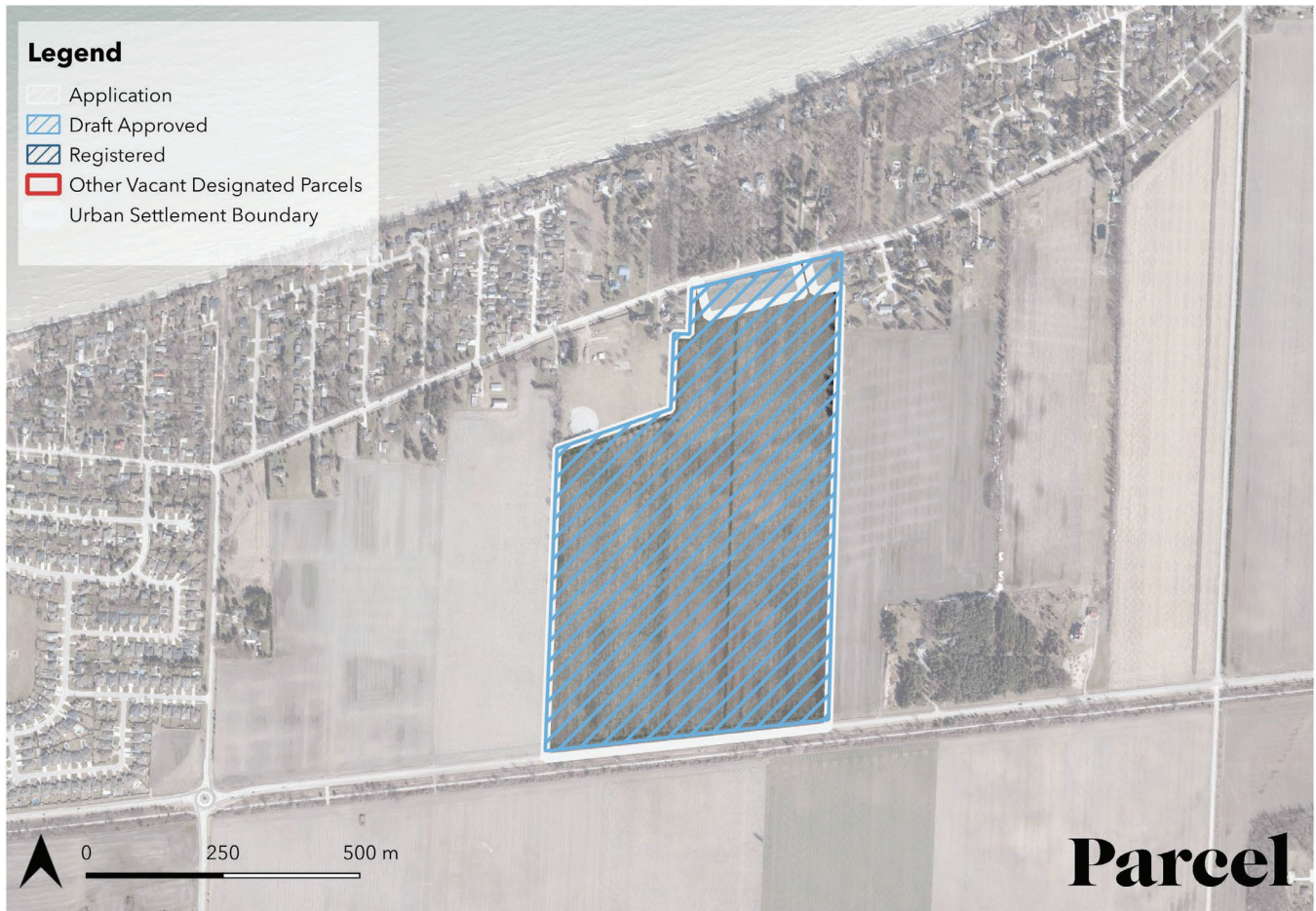


Figure B- 15

Lakeshore Development Area 2 Residential Supply Map



Figure B- 16

Lakeshore Development Area 3 Residential Supply Map



Figure B- 17

Wyoming Residential Supply Map

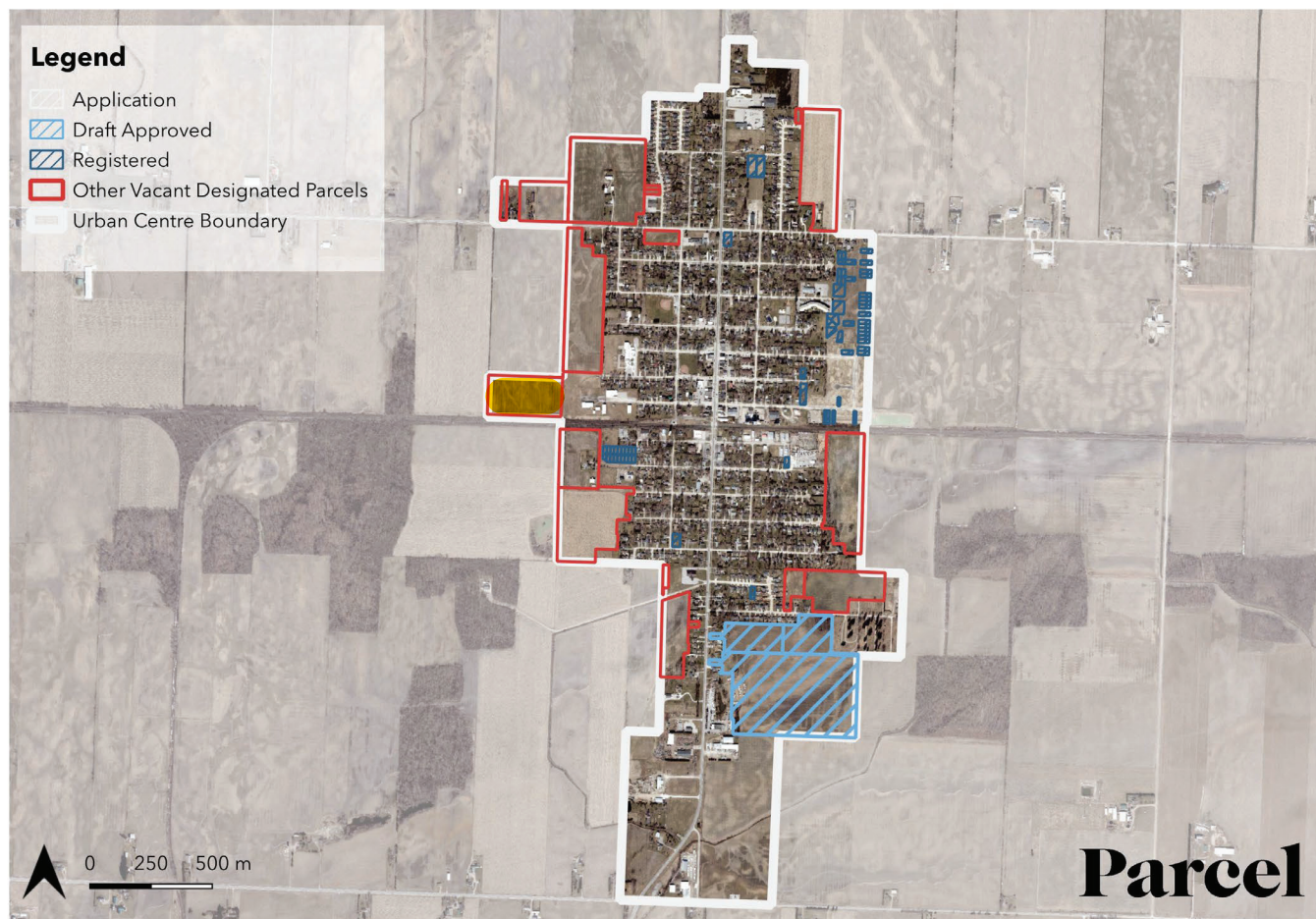


Figure D- 11

Wyoming Non-Residential Land Supply Map

