



Middlesex County
Housing Accelerator CIP Updates
Joint Background & Context Report

August 2025



Middlesex County Housing Accelerator CIP Updates Joint Background & Context Report

August 2025

RE:PUBLIC

The information contained in this document produced by Re:Public Urbanism is solely for the use of the Client for the purpose for which it has been prepared. Re:Public Urbanism undertakes no duty to nor accepts any responsibility to any third party who may rely upon this document.

Table of Contents

1.0 Introduction	1
2.0 Policy/Legislative Review	2
3.0 Middlesex Attainable Housing Review	6
4.0 Local Housing Context	8
5.0 CIP Review & Gap Analysis	26
6.0 Jurisdictional Scan	38
7.0 Consultation	51
8.0 Conclusions, Recommendations, & Next Steps	70

1.0 Introduction

In response to the pressing need for more affordable and climate-resilient housing, Middlesex County and each of its local municipalities are together advancing a multi-municipal initiative supported by the Canada Mortgage and Housing Corporation (CMHC) through the Housing Accelerator Fund (HAF). This initiative focuses on enhancing the existing Community Improvement Plans (CIPs) of three local municipalities: the Municipality of Strathroy-Caradoc, the Township of Lucan Biddulph, and the Municipality of North Middlesex, to better support the development of attainable and sustainable housing options in the County. This work is critical not only to advancing HAF-related initiatives but also to generating resources, data, and recommendations that could be shared with local municipalities that did not receive HAF funding.

HAF is a federal funding program designed to catalyze transformative change in municipal housing systems by supporting initiatives that remove barriers to housing development and encourage more responsive planning and regulatory frameworks. In exchange for funding, participating municipalities are required to commit to measurable actions that increase housing supply, improve affordability, and accelerate the delivery of new units, particularly those that support climate goals, rental tenure, and affordability for lower- and moderate-income households.

Rather than establishing new CIPs, this project seeks to strengthen and expand the CIP programming already in place within each municipality. The goal is to introduce new, actionable, and locally relevant financial incentives that can accelerate the delivery of affordable rental and ownership housing, support transitional and deeply affordable housing, and promote climate-conscious building practices. These enhancements will be grounded in a thorough review of local policy frameworks, housing market conditions, and infrastructure capacity, and will be informed by meaningful engagement with municipal staff, the public, and housing sector partners.

This Background Report & Needs Assessment has been prepared as a foundational step in the project's overall work plan. It serves to:

- Provide an overview of relevant legislative and policy directions at the federal, provincial, and municipal levels;
- Summarize the findings of the Middlesex Attainable Housing Review;
- Analyze local housing markets and development dynamics in each of the three participating municipalities;
- Identify gaps and barriers within existing CIP frameworks that may hinder the implementation of enhanced incentive programs; and,
- Present insights from preliminary consultation activities and a jurisdictional scan of best practices.

Together, these components will inform the refinement of CIP programming, tailored to local needs and capacities, while also meeting the outcomes required by HAF. The findings in this Report will support the next phases of the project, including the development, consultation, and integration of draft CIP amendments in each municipality.

2.0 Policy/Legislative Review

This section provides an overview of the planning and legislative framework that governs the implementation of Community Improvement Plans (CIP) in Ontario, and the policy directions relevant to enabling affordable and climate-resilient housing in Middlesex County. A clear understanding of the federal, provincial, County, and local policy context is essential to ensure that proposed CIP programming is aligned with broader land use planning objectives and eligible for implementation within existing statutory tools.

2.1 Federal Level

The Government of Canada, through the Canada Mortgage and Housing Corporation (CMHC), plays a central role in enabling and funding municipal housing initiatives. The most relevant federal initiative informing this project is the Housing Accelerator Fund (HAF), a \$4 billion national program introduced in 2023 to support municipalities in delivering more housing more quickly. HAF funding is awarded to municipalities that commit to implementing systemic reforms such as:

- Updating zoning and land use policies to enable more housing types;
- Introducing new or enhanced financial incentives, such as CIP-based grants or tax relief; and
- Promoting affordable, rental, and climate-resilient housing supply.

Funding under HAF is outcome-based, with disbursements tied to milestone achievements and housing completions. The program strongly encourages municipalities to adopt measures that result in:

- Affordable housing units, particularly those affordable to lower- and moderate-income households;
- Rental housing options, including supportive and transitional housing;
- Climate-conscious development, with attention to energy efficiency, emissions reduction, and sustainability.

Municipalities participating in HAF must demonstrate a commitment to long-term housing system change, and HAF investments must be integrated into local planning frameworks, including through tools such as CIPs.

2.2 Provincial Level

CIPs are authorized under Section 28 of the Planning Act, which enables municipalities to designate Community Improvement Project Areas (CIPAs) and prepare plans that facilitate revitalization, rehabilitation, and strategic investment in these areas. CIPs can include a range of financial incentives, including grants and loans, to support housing, economic development, accessibility, environmental remediation, and infrastructure improvements.

The Provincial Planning Statement (PPS) sets the overarching land use policy framework in Ontario. Among its key priorities are:

- Expanding the supply and mix of housing, including affordable, rental, and supportive housing options;
- Supporting climate resilience and compact, efficient development;
- Promoting the optimization of existing infrastructure within serviced settlement areas;
- Encouraging tools like CIPs to support community revitalization and targeted housing outcomes.

In addition to the PPS and Planning Act, the Development Charges Act, 1997 and related regulations play an important role in shaping the financial feasibility of housing development. Through the More Homes Built Faster Act, 2022, the Province introduced new exemptions from, and reductions to, municipal development charges for affordable residential units. These changes came into effect on June 1, 2024, and are intended to reduce cost barriers for projects that deliver long-term affordable housing.

In support these exemptions and reductions, the Province issued a technical bulletin titled “Affordable Residential Units for the Purposes of the Development Charges Act, 1997”, which outlines the eligibility thresholds for development charge exemptions and exclusions from community benefits charges and parkland dedication requirements. These thresholds apply until replaced, with updated figures anticipated in July 2025. To qualify for exemptions:

- Units must be subject to agreements ensuring affordability for at least 25 years and must be sold or rented at arm’s length.
- For ownership housing, affordability is defined as the lesser of:
 - 90% of the average market purchase price for the unit type in the local municipality (market-based); or,
 - A price that results in annual shelter costs equal to 30% of gross household income at the 60th percentile (income-based).
- For rental housing, affordability is defined as the lesser of:
 - Average market rent for the unit type in the local municipality (market-based); or,
 - Rent equal to 30% of gross annual income for renter households at the 60th percentile (income-based).

These provincial changes directly affect the financial landscape for housing developers and can be leveraged in tandem with CIP incentives to improve project viability for affordable and supportive housing. Any proposed CIP amendments should be designed to complement these provincial tools and ensure alignment with the evolving definition of affordability under Ontario law.

2.3 County Level

While Middlesex County is not an approval authority for lower-tier CIPs, its planning framework provides a regional context that guides growth management, housing policy, and infrastructure planning across its member municipalities. The County of Middlesex Official Plan supports the creation and use of CIPs by local municipalities and includes relevant policy direction in the following areas:

- Affordable and Attainable Housing – The Plan encourages lower-tier municipalities to identify and pursue opportunities to address housing affordability, including through the use of CIPs.
- Settlement Area Planning – Growth is directed to fully serviced settlement areas, supporting the use of CIPs to enable infill, intensification, and redevelopment.
- Alignment with County Initiatives – The County has also completed a Middlesex Attainable Housing Review, which outlines priority actions to improve housing access across the region. This document provides valuable insight into key gaps, demographic trends, and areas of policy focus that will inform the development of CIP programming.

Following completion of the 2021–2025 Economic Development Strategic Plan, Middlesex County established an annual CIP Implementation Program that enabled local municipalities to apply for reimbursement of up to 50% of their contributions to approved CIP projects. This program, launched in 2021, has helped enhance local investment in facade improvements, signage, and other revitalization efforts across participating municipalities.

Most recently, at the time of writing, the County of Middlesex Committee of the Whole is being asked to consider an expansion to County participation in CIP programming through the “Community Improvement Support Program (CISP)”. This is a new policy-driven initiative that will seek to provide up to 50% matching funds to support local Community Improvement Plans (CIPs). Designed to align with the County’s strategic goals around economic development, attainable housing, and inter-municipal collaboration, the plan, if adopted by Council, would see an annual budget commitment distributed amongst three CIP support streams: (1) general property revitalization; (2) industrial and commercial development; and (3) housing-related development.

This HAF-focused CIP review will ensure that each of the three constituent municipalities (in addition to the remaining who choose to pursue CIP updates of their own) can take immediate advantage of the expanded supports from the County in 2026.

2.4 Local Level

Each of the three participating municipalities (Strathroy-Caradoc, Lucan Biddulph, and North Middlesex) have adopted a CIP under Section 28 of the Planning Act. These CIPs provide a range of financial programming to target a variety of priorities in each respective community, including the provision of housing. Each municipality is responsible for funding and implementing their respective CIPs. All three of the locals also administer their own respective official plans and other strategic planning documents. The following table summarizes the key aspects of each local CIP, including the identification of any existing housing programming offered by each local municipality.

Municipality	CIP Age	CIPA Limits	CIP Goals & Objectives	Housing Incentive Programming	Other Incentive Programming
Strathroy-Caradoc	2020	Entire municipality	<ul style="list-style-type: none"> Housing for all Beautiful space, place, and identity Strong culture and heritage Destination through reinvigoration Economic opportunity, rural diversity, and agri-tourism 	<ul style="list-style-type: none"> Intensification and redevelopment program Additional unit program Downtown rental housing program Attainable housing program Environmental and sustainability program 	<ul style="list-style-type: none"> Beautification program Intensification and redevelopment program Heritage program Public art and interim use program Urban economic development program Rural economic development and agri-tourism program Environmental and sustainability program
Lucan Biddulph	2021	Entire municipality	<ul style="list-style-type: none"> Balancing population growth with economic growth Community accessibility and mobility Community recreation and public space Supporting culture, heritage, and community identity Main street beautification and revitalization 	<ul style="list-style-type: none"> Conversion, expansion, and redevelopment program Additional dwelling unit program Affordable rental housing unit program 	<ul style="list-style-type: none"> Beautification program Rural opportunity program Conversion, expansion, and redevelopment program Industrial stimulus program Accessibility program
North Middlesex	2021	Entire municipality	<ul style="list-style-type: none"> Main street beautification and revitalization Rural economic health and vitality Housing choice and affordability Maintaining community character More in the core! 	<ul style="list-style-type: none"> Conversion, expansion, and redevelopment program Additional residential unit program Affordable rental housing unit program 	<ul style="list-style-type: none"> Beautification program Rural economic development program Conversion, expansion, and redevelopment program Accessibility program Brownfields study program

3.0 Middlesex Attainable Housing Review

To support evidence-based policy development and inform local housing strategies, Middlesex County undertook a two-part housing research initiative in 2023: 1) the Middlesex Housing Needs Assessment, and 2) the Attainable Housing Review Final Report. Together, these studies provide a robust picture of the County's housing challenges, emerging needs, and the strategic opportunities available to municipalities to respond through local planning and incentive tools, including CIPs. The findings serve as a foundational input into this HAF-supported initiative to enhance local CIPs in Lucan Biddulph, Strathroy-Caradoc, and North Middlesex.

3.1 Housing Needs Assessment

The Housing Needs Assessment offers a quantitative snapshot of demographic change, housing demand, supply gaps, and affordability pressures across Middlesex County. The report highlights that between 2016 and 2021, the County experienced significant population growth, led by Lucan Biddulph (20.9%) and Strathroy-Caradoc (14.4%). Much of this growth has been driven by young families and in-migration from urban regions such as the Greater Golden Horseshoe. In many communities, household formation has outpaced new housing supply.

The housing stock remains overwhelmingly oriented toward low-density ownership housing, with approximately 82% of households owning their home and only 18% renting. This difference tenure has contributed to a shortage of smaller unit types and a near-absence of purpose-built rental housing. Despite CMHC data showing average rents around \$1,039, real market listings reveal that rents for larger units often range from \$2,000 to \$3,000 per month, underscoring the growing inaccessibility of rental options.

Affordability challenges in the ownership market have also escalated sharply. In Strathroy-Caradoc, average home prices surpassed \$770,000 by 2022. In Middlesex Centre, average prices exceeded \$1 million. At the same time, the number of households spending more than 30% of their income on housing increased by 62% between 2016 and 2021, a clear indicator of deepening core housing need. These challenges are especially acute for single-person households, seniors on fixed incomes, and households in low- to moderate-income brackets.

The assessment concludes that municipalities across the County must broaden the supply of housing types and tenures, with a focus on rental and higher-density infill development. Planning tools such as CIPs can play an essential role by offering incentives to encourage affordable rental construction, promote compact development, and support the creation of additional residential units (ARU) and other forms "missing middle" or mid-density housing such as plexes and low-rise apartments.

3.2 Attainable Housing Review Final Report

The Attainable Housing Review Final Report builds on the Needs Assessment by articulating a strategic vision, setting policy goals, and outlining 21 actionable recommendations to improve housing outcomes across Middlesex County. The vision

affirms that every resident should have access to housing that meets their needs, with local municipalities and the County working in partnership to address gaps across the housing continuum.

Consultation played a significant role in shaping the final report. Feedback from more than 200 residents and stakeholders revealed a shared desire to diversify housing options, increase affordability, reduce barriers to development, and support the needs of seniors, young families, and vulnerable populations. Participants also expressed strong interest in municipal leadership, particularly in using financial incentives, surplus lands, and regulatory tools to enable housing solutions.

Among the most directly applicable recommendations to this CIP initiative are calls for municipalities to adopt affordability targets, modernize zoning to support diverse forms of housing, and expand the use of financial incentives to support affordable, rental, supportive, and climate-conscious housing development. The report emphasizes the potential for CIPs to act as a delivery mechanism for these goals, given their flexibility, and existing legislative authority under the Planning Act.

Key recommendations include establishing clear housing targets (e.g., 10% of new development as affordable rental and 15% as attainable ownership), creating incentive programs for non-profit and Indigenous housing providers, and incorporating energy efficiency or sustainability benchmarks into funding criteria. The report also encourages municipalities to expedite approvals for affordable housing projects and prioritize applications that align with community housing goals.

4.0 Local Housing Context

This section provides a summary of the local housing context in Lucan Biddulph, North Middlesex, and Strathroy-Caradoc, including key demographic, household, and housing characteristics drawn from the 2021 Census and the CMHC-endorsed Housing Assessment Resource Tool (HART). For each municipality, data is presented on population trends, household types, dwelling stock, incomes, housing affordability, and projected housing need to 2031. This analysis is intended to ground any future CIP revisions in a clear understanding of local needs and conditions. To support program design and calibrating incentive programming, high-level construction cost estimates have also been prepared using the 2025 Altus Construction Cost Guide to illustrate the typical per-unit cost of different housing typologies in each municipality. Together, these insights help contextualize the financial realities of housing development and the level of municipal support that may be required to enable more affordable, diverse, and climate-resilient housing options.

4.1.0 Lucan Biddulph

All of the following data is sourced from the 2021 Canadian Census: Statistics Canada, 2021 Census of Population. Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Released November 15, 2023. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>

Lucan Biddulph is a primarily rural municipality with two primary urban centres, Lucan and Granton. Centrally located in southwestern Ontario, the Township benefits from its proximity to major regional centres, situated 15 minutes drive from the City of London, and approximately two hours drive west of Toronto. This advantageous location, coupled with its rural character, has contributed to strong recent population growth and increased demand for housing.

According to the 2021 Census, Lucan Biddulph had a population of 5,680, reflecting a 20.9% increase since 2016, the highest growth rate among the participating municipalities. The community has a relatively young population, with 21.2% of residents under age 15, 63.5% between 15 and 64, and 15.3% aged 65 and over. The average age is 38.5, and the median age is 37.6.

With respect to housing, there were 2,172 private dwellings in 2021, of which 2,115 were occupied by usual residents, indicating a predominantly permanent residential population. These characteristics form the basis for understanding current and projected housing needs in Lucan Biddulph and help inform future adjustments to Community Improvement Plan programming.

2021 Tenure

Total	2,115
Owner	1,815
Renter	300

Source: Statistics Canada, 2021 Census of Population, Lucan Biddulph

2021 Dwelling Typologies

Total	2,115
Single Detached	1,850
Semi Detached	60
Row House	35
Apartment or Flat in Duplex	35
Apartment in Building <5 Storeys	135
Apartment in Building >5 Storeys	0
Other Single-Attached House	5
Movable Dwelling (mobiles, RVs, etc.)	0

Source: Statistics Canada, 2021 Census of Population, Lucan Biddulph

2021 Household Sizes vs. Dwelling Sizes

Household Size	Number of Households	Number of Dwellings	Dwelling Size
1 Person	405	105	1 Bedroom
2 Persons	780	275	2 Bedrooms
3 Persons	315	1,075	3 Bedrooms
4+ Persons	610	655	4+ Bedrooms

Source: Statistics Canada, 2021 Census of Population, Lucan Biddulph

2021 Shelter Costs

Tenure	Average Monthly Shelter Costs	Median Monthly Shelter Costs
Owner Households	\$1,486	\$1,490
Renter Households	\$1,020	\$880

Source: Statistics Canada, 2021 Census of Population, Lucan Biddulph

HART Income Categories and Affordable Shelter Cost, 2021 Census Data

<https://hart.ubc.ca/housing-needs-assessment-tool/>

Income Category	% of Total HHs	Annual HH Income	Affordable Monthly Shelter Cost
Area Median Household Income		\$105,000	\$2,625
Very Low Income (20% or under of AMHI)	2.05%	<= \$21,000	<= \$525
Low Income (21% to 50% of AMHI)	14.58%	\$21,000 - \$52,500	\$525 - \$1,313
Moderate Income (51% to 80% of AMHI)	20.46%	\$52,500 - \$84,000	\$1,313 - \$2,100
Median Income (81% to 120% of AMHI)	26.09%	\$84,000 - \$126,000	\$2,100 - \$3,150
High Income (121% and more of AMHI)	36.83%	>= \$126,001	>= \$3,151

Source: HART Housing Needs Assessment Tool, Lucan Biddulph

Income categories are determined by their relationship with each geography's Area Median Household Income (AMHI). The table above shows the range of household incomes and affordable housing costs that make up each income category, in 2020-dollar values. It also shows what the portion of total households that fall within each category.

4.1.1 Lucan Biddulph MMAH Affordability Benchmarks

<https://www.ontario.ca/page/municipal-development-and-community-benefits-charges-and-parklands>

Each year, the Ministry of Municipal Affairs and Housing (MMAH) publishes an affordability bulletin that sets out income-based purchase price and rent thresholds for residential units across Ontario. These thresholds are used to determine eligibility for development charge exemptions and other affordability-related policies under the Development Charges Act and the Planning Act. The benchmarks presented below reflect the 2024 figures applicable to Lucan Biddulph and serve as a reference point for assessing housing affordability in the local context.

These thresholds are used as a benchmark to assess the affordability of new housing supply. The following table presents the 2024 affordable ownership and rental thresholds for Lucan Biddulph, calculated using this methodology.

	Single Detached	Semi-Detached	Row / Townhouse	Condo Apartment
Affordable Price (MMAH)	\$431,200	\$431,200	\$431,200	\$414,000
	Bachelor Apt	1 Bed Apt	2 Bed Apt	3+ Bed Apt
Affordable Rent (MMAH)	\$957	\$1,191	\$1,479	\$1,706

Source: 2024 MMAH Affordability Benchmark Bulletin

4.1.2 Lucan Biddulph Growth Projections

The following population and household projections are provided to help summarize expected housing/household growth in the Township, further contextualizing the need to support more diverse, affordable, and attainable housing options. Two key sources are referenced below: (1) Household Projections based on the Housing Assessment Resource Tool (HART) methodology and; (2) Population and Housing Forecasts based on the growth analysis prepared by Watson & Associates for Middlesex County in 2025. Each of these sources are summarize in this section.

It should be noted that while the HART methodology provides an estimate of future households largely by income level, it only projects to 2031 and uses a line of best fit from historical census data. The Watson forecasts provide a more robust projection for overall population and housing growth based on more recent data, provincial guidelines, and robust methodologies, in addition to historical census data. It should be further noted that the Watson projections are the preferred source for estimating future growth; however, the HART projections still provide value in helping to understand the share of households by income level in the near future. To this end, each should be read in conjunction with one another.

1. Housing Assessment Resource Tool (HART) Household Projections

<https://hart.ubc.ca/housing-needs-assessment-tool/>

Projections from the Housing Assessment Resource Tool (HART) have been used to estimate changes in the number and type of households in Lucan Biddulph by 2031 – mainly to help anticipate future housing need based on household income. These projections follow a “business as usual” methodology, using a line of best fit based on Census data from 2006, 2016, and 2021. As such, they do not account for recent or future policy shifts, in-migration trends, or regional market pressures, but they do offer a useful baseline for considering the scale and composition of housing demand if current trends continue.

The projections provide an estimated change in total households by income category (using CMHC-aligned affordability thresholds), household size, and a cross-tabulation of income category by household size. This information can help inform CIP program design by highlighting the need for affordable, family-oriented, or smaller-unit rental and ownership housing in the coming years. While not prescriptive, these trends serve as a valuable input for priority-setting and may assist in identifying gaps or opportunities for targeted incentive programming.

Household Projections by Income Category 2021 to 2031

HH Income Category	2021 HHs	Projected Gain/Loss of HHs by 2031	Total
Very Low Income	55	-17	38
Low Income	290	29	319
Moderate Income	400	59	459
Median Income	510	99	609
High Income	720	113	833
Total	1975	283	2258

Source: HART Housing Needs Assessment Tool, Lucan Biddulph

Household Projections by Household Size 2021 to 2031

HH Size	2021 HHs	Projected Gain/Loss of HHs by 2031	Total 2031 HHs
1 Person	400	106	506
2 Person	700	137	837
3 Person	330	13	343
4 Person	350	30	380
5+ Person	195	3	198
Total	1975	289	2264

Source: HART Housing Needs Assessment Tool, Lucan Biddulph

Household Projections by Household Size and Income Category

HH Income Category	1 Person	2 Person	3 Person	4 Person	5+ Person	Total
Very Low Income	45	0	0	0	0	45
Low Income	225	91	0	9	0	325

Moderate Income	176	192	71	48	0	487
Median Income	35	317	106	63	52	573
High Income	36	247	147	271	132	833
Total	517	847	324	391	184	2263

Source: HART Housing Needs Assessment Tool, Lucan Biddulph

2. Middlesex County Growth Forecast for Population and Housing Units 2025

Middlesex County Growth Analysis Update – Final Report, Watson & Associates Economists Ltd. 2025

Population Projections are included within the County's Official Plan and are intended to be used by the County, local municipalities and others to assist in managing growth and development. In 2025, Watson & Associates Economists (Watson) were engaged to update the County's projections to reflect Provincial changes in required methodology and shifts in growth patterns in the region. As part of this work, four population growth scenarios (Low, Medium, Medium-High and High) were prepared specific to Middlesex County without the City of London. Of the four long-term growth scenarios prepared for Middlesex County, Watson recommended the Medium-High Growth Scenario as the preferred forecast. Under this scenario, the County's population is expected to grow to 151,500 by 2056, representing an average annual growth rate of 1.8%.

As part of this work, Watson prepared summary forecast tables for each municipality, grounding the Medium-High County Growth Scenario within local contexts. The table below is sourced from Figure F-3 of the Watson report and summarizes Lucan Biddulph's population and housing growth forecasts from 2026 to 2056.

Township of Lucan Biddulph Population and Housing Forecast, 2026 to 2056

Year		Population (Including Census undercount) ^[1]	Housing Units				Total Households	Persons Per Unit (P.P.U.) with undercount
			Low Density ^[2]	Medium Density ^[3]	High Density ^[4]	Other		
Historical	Mid-2001	4,400	1,290	10	130	10	1,440	3.06
	Mid-2006	4,400	1,340	20	150	10	1,510	2.91
	Mid-2011	4,500	1,460	30	90	20	1,600	2.83
	Mid-2016	4,900	1,630	40	120	20	1,790	2.75
	Mid-2021	5,900	1,910	70	140	10	2,120	2.80
Forecast	Mid-2026	6,800	2,080	120	300	10	2,500	2.73
	Mid-2031	7,900	2,370	160	360	10	2,900	2.73
	Mid-2036	8,700	2,600	200	410	10	3,210	2.72
	Mid-2041	9,400	2,800	230	450	10	3,490	2.70
	Mid-2046	9,900	2,970	260	500	10	3,730	2.67
	Mid-2051	10,500	3,150	280	530	10	3,960	2.64
	Mid-2056	10,900	3,320	290	570	10	4,190	2.59

Source: Middlesex County Growth Analysis Update – Final Report, Watson & Associates Economists Ltd. 2025, Figure F-3 (table modified by Re:Public Urbanism)

4.2.0 North Middlesex

All of the following data is sourced from the 2021 Canadian Census: Statistics Canada, 2021 Census of Population. Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Released November 15, 2023. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>

North Middlesex is a rural municipality in southwestern Ontario located within close proximity to London, Sarnia, Stratford, and Lake Huron — all accessible within an hour's drive. The municipality includes the settlement areas of Parkhill, Ailsa Craig, and Nairn, with additional population distributed across rural lands and smaller hamlet communities. As of the 2021 Census, North Middlesex had a population of 6,307, representing a slight decline of 0.7% since 2016. The community has an older age profile compared to its neighbours, with 21.7% of residents aged 65 and over, and a median age of 44.0. There were 2,481 private dwellings recorded in 2021, of which 2,391 were occupied by usual residents, reflecting a stable and largely permanent residential base.

2021 Tenure

Total	2,390
Owner	1,960
Renter	435

Source: Statistics Canada, 2021 Census of Population, North Middlesex

2021 Dwelling Typologies

Total	2,390
Single Detached	2,170
Semi Detached	15
Row House	0
Apartment or Flat in Duplex	10
Apartment in Building <5 Storeys	180
Apartment in Building >5 Storeys	0
Other Single-Attached House	5
Movable Dwelling (mobiles, RVs, etc.)	10

Source: Statistics Canada, 2021 Census of Population, North Middlesex

2021 Household Sizes vs. Dwelling Sizes

Household Size	Number of Households	Number of Dwellings	Dwelling Size
1 Person	565	10	0 Bedrooms
		125	1 Bedroom
2 Persons	890	325	2 Bedrooms
3 Persons	335	1,125	3 Bedrooms
4+ Persons	600	815	4+ Bedrooms

Source: Statistics Canada, 2021 Census of Population, North Middlesex

2021 Shelter Costs

Tenure	Average Monthly Shelter Costs	Median Monthly Shelter Costs
Owner Households	\$1,316	\$1,180
Renter Households	\$820	\$665

Source: Statistics Canada, 2021 Census of Population, North Middlesex

HART Income Categories and Affordable Shelter Cost, 2021 Census Data

Income Category	% of Total HHs	Annual HH Income	Affordable Monthly Shelter Cost
Area Median Household Income		\$90,000	\$2,250
Very Low Income (20% or under of AMHI)	0.74%	<= \$18,000	<= \$450
Low Income (21% to 50% of AMHI)	20.1%	\$18,000 - \$45,000	\$450 - \$1,125
Moderate Income (51% to 80% of AMHI)	15.93%	\$45,000 - \$72,000	\$1,125 - \$1,800
Median Income (81% to 120% of AMHI)	24.75%	\$72,000 - \$108,000	\$1,800 - \$2,700
High Income (121% and more of AMHI)	38.48%	>= \$108,001	>= \$2,701

Source: HART Housing Needs Assessment Tool, North Middlesex

Income categories are determined by their relationship with each geography's Area Median Household Income (AMHI). The table above shows the range of household incomes and affordable housing costs that make up each income category, in 2020 dollar values. It also shows what the portion of total households that fall within each category.

4.2.1 North Middlesex MMAH Affordability Benchmarks

<https://www.ontario.ca/page/municipal-development-and-community-benefits-charges-and-parklands>

Each year, the Ministry of Municipal Affairs and Housing (MMAH) publishes an affordability bulletin that sets out income-based purchase price and rent thresholds for residential units across Ontario. These thresholds are used to determine eligibility for development charge exemptions and other affordability-related policies under the Development Charges Act and the Planning Act. The benchmarks presented below reflect the 2024 figures applicable to North Middlesex, and serve as a reference point for assessing housing affordability in the local context.

These thresholds are used as a benchmark to assess the affordability of new housing supply. The following table presents the 2024 affordable ownership and rental thresholds for North Middlesex, calculated using this methodology.

	Single Detached	Semi-Detached	Row / Townhouse	Condo Apartment
Affordable Price (MMAH)	\$377,300	\$377,300	\$377,300	\$377,300
	Bachelor Apt	1 Bed Apt	2 Bed Apt	3+ Bed Apt
Affordable Rent (MMAH)	\$957	\$1,191	\$1,479	\$1,706

Source: 2024 MMAH Affordability Benchmark Bulletin

4.2.2 North Middlesex Growth Projections

The following population and household projections are provided to help summarize expected housing/household growth in the Municipality, further contextualizing the need to support more diverse, affordable, and attainable housing options. Two key sources are referenced below: (1) Household Projections based on the Housing Assessment Resource Tool (HART) methodology and; (2) Population and Housing Forecasts based on the growth analysis prepared by Watson & Associates for Middlesex County in 2025. Each of these sources are summarized in this section.

It should be noted that while the HART methodology provides an estimate of future households largely by income level, it only projects to 2031 and uses a line of best fit from historical census data. The Watson forecasts provide a more robust projection for overall population and housing growth based on more recent data, provincial guidelines, and robust methodologies, in addition to historical census data. It should be further noted that the Watson projections are the preferred source for estimating future growth; however, the HART projections still provide value in helping to understand the share of households by income level in the near future. To this end, each should be read in conjunction with one another.

1. Housing Assessment Resource Tool (HART) Household Projections

<https://hart.ubc.ca/housing-needs-assessment-tool/>

Projections from the Housing Assessment Resource Tool (HART) have been used to estimate changes in the number and type of households in North Middlesex by 2031 – mainly to help anticipate future housing need based on household income. These projections follow a “business as usual” methodology, using a line of best fit based on Census data from 2006, 2016, and 2021. As such, they do not account for recent or future policy shifts, in-migration trends, or regional market pressures, but they do offer a useful baseline for considering the scale and composition of housing demand if current trends continue.

The projections provide an estimated change in total households by income category (using CMHC-aligned affordability thresholds), household size, and a cross-tabulation of income category by household size. This information can help inform CIP program design by highlighting the need for affordable, family-oriented, or smaller-unit rental and ownership housing in the coming years. While not prescriptive, these trends serve as a valuable input for priority-setting and may assist in identifying gaps or opportunities for targeted incentive programming.

Household Projections by Income Category 2021 to 2031

HH Income Category	2021 HHs	Projected Gain/Loss of HHs by 2031	Total
Very Low Income	35	16	51
Low Income	420	9	429
Moderate Income	325	-7	318
Median Income	505	-39	466
High Income	785	-11	774
Total	2070	-32	2038

Source: HART Housing Needs Assessment Tool, North Middlesex

Household Projections by Household Size 2021 to 2031

HH Size	2021 HHs	Projected Gain/Loss of HHs by 2031	Total 2031 HHs
1 Person	540	94	634
2 Person	735	17	752
3 Person	260	-44	216
4 Person	345	-46	299
5+ Person	190	-54	136
Total	2070	-33	2037

Source: HART Housing Needs Assessment Tool, North Middlesex

Household Projections by Household Size and Income Category

HH Income Category	1 Person	2 Person	3 Person	4 Person	5+ Person	Total
Very Low Income	45	0	0	0	0	45
Low Income	357	64	11	0	0	432
Moderate Income	122	143	34	11	0	310
Median Income	91	217	70	94	32	504
High Income	36	324	97	206	116	779
Total	651	748	212	311	148	2070

Source: HART Housing Needs Assessment Tool, North Middlesex

2. Middlesex County Growth Forecast for Population and Housing Units 2025

Middlesex County Growth Analysis Update – Final Report, Watson & Associates Economists Ltd. 2025

Population Projections are included within the County's Official Plan and are intended to be used by the County, local municipalities and others to assist in managing growth and development. In 2025, Watson & Associates Economists (Watson) were engaged to update the County's projections to reflect Provincial changes in required methodology and shifts in growth patterns in the region. As part of this work, four population growth scenarios (Low, Medium, Medium-High and High) were prepared specific to Middlesex County without the City of London. Of the four long-term growth scenarios prepared for

Middlesex County, Watson recommended the Medium-High Growth Scenario as the preferred forecast. Under this scenario, the County's population is expected to grow to 151,500 by 2056, representing an average annual growth rate of 1.8%.

As part of this work, Watson prepared summary forecast tables for each municipality, grounding the Medium-High County Growth Scenario within local contexts. The table below is sourced from Figure F-9 of the Watson report and summarizes North Middlesex's population and housing growth forecasts from 2026 to 2056.

North Middlesex Population and Housing Forecast, 2026 to 2056

Year		Population (Including Census undercount) ^[1]	Housing Units					Persons Per Unit (P.P.U.) with undercount
			Low Density ^[2]	Medium Density ^[3]	High Density ^[4]	Other	Total Households	
Historical	Mid-2001	7,200	2,180	70	80	20	2,330	3.10
	Mid-2006	7,000	2,170	20	100	30	2,310	3.05
	Mid-2011	7,000	2,200	10	130	10	2,340	2.97
	Mid-2016	6,600	2,190	10	120	30	2,350	2.83
	Mid-2021	6,600	2,190	10	180	20	2,390	2.76
Forecast	Mid-2026	6,800	2,290	20	180	20	2,510	2.71
	Mid-2031	7,200	2,440	30	180	20	2,660	2.69
	Mid-2036	7,600	2,580	50	190	20	2,840	2.67
	Mid-2041	8,000	2,730	80	210	20	3,040	2.65
	Mid-2046	8,500	2,890	110	230	20	3,240	2.64
	Mid-2051	8,900	3,030	150	240	20	3,430	2.61
	Mid-2056	9,300	3,160	190	250	20	3,610	2.56

Source: Middlesex County Growth Analysis Update – Final Report, Watson & Associates Economists Ltd. 2025, Figure F-9 (table modified by Re:Public Urbanism)

4.3.0 Strathroy-Caradoc

All of the following data is sourced from the 2021 Canadian Census: Statistics Canada, 2021 Census of Population. Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Released November 15, 2023. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E>

Strathroy-Caradoc is the largest municipality in Middlesex County, located approximately 40 kilometres west of London, Ontario, and accessible via Highway 402. The municipality includes a mix of urban and rural areas and serves as a regional service hub for western Middlesex and eastern Lambton Counties. Formed through amalgamation in 2001, the community had a population of 23,871 in 2021, representing a 14.4% increase since 2016. The population is moderately older, with 21.5% aged 65 and over, and a median age of 43.6. In 2021, there were 9,695 private dwellings, of which 9,453 were occupied by usual residents, reflecting a stable residential base across both the urban and rural settlement areas.

2021 Tenure

Total	9,450
Owner	7,385
Renter	2,065

Source: Statistics Canada, 2021 Census of Population, Strathroy-Caradoc

2021 Dwelling Typologies

Total	2,455
Single Detached	6,865
Semi Detached	650
Row House	370
Apartment or Flat in Duplex	90
Apartment in Building <5 Storeys	1,265
Apartment in Building >5 Storeys	0
Other Single-Attached House	30
Movable Dwelling (mobiles, RVs, etc.)	190

Source: Statistics Canada, 2021 Census of Population, Strathroy-Caradoc

2021 Household Sizes vs. Dwelling Sizes

Household Size	Number of Households	Number of Dwellings	Dwelling Size
1 Person	2,235	20	No Bedrooms
		730	1 Bedroom
2 Persons	3,605	2,010	2 Bedrooms
3 Persons	1,485	3,870	3 Bedrooms
4+ Persons	2,130	2,825	4+ Bedrooms

Source: Statistics Canada, 2021 Census of Population, Strathroy-Caradoc

2021 Shelter Costs

Tenure	Average Monthly Shelter Costs	Median Monthly Shelter Costs
Owner Households	\$1,271	\$1,150
Renter Households	\$1,124	\$1,030

Source: Statistics Canada, 2021 Census of Population, Strathroy-Caradoc

HART Income Categories and Affordable Shelter Cost, 2021 Census Data

Income Category	% of Total HHs	Annual HH Income	Affordable Monthly Shelter Cost
Area Median Household Income		\$88,000	\$2,200
Very Low Income (20% or under of AMHI)	2.01%	<= \$17,600	<= \$440
Low Income (21% to 50% of AMHI)	17.03%	\$17,600 - \$44,000	\$440 - \$1,100
Moderate Income (51% to 80% of AMHI)	18.6%	\$44,000 - \$70,400	\$1,100 - \$1,760
Median Income (81% to 120% of AMHI)	22.61%	\$70,400 - \$105,600	\$1,760 - \$2,640
High Income (121% and more of AMHI)	39.75%	>= \$105,601	>= \$2,641

Source: HART Housing Needs Assessment Tool, Strathroy-Caradoc

Income categories are determined by their relationship with each geography's Area Median Household Income (AMHI). The table above shows the range of household incomes and affordable housing costs that make up each income category, in 2020-dollar values. It also shows what the portion of total households that fall within each category.

4.3.1 Strathroy-Caradoc MMAH Affordability Benchmarks

<https://www.ontario.ca/page/municipal-development-and-community-benefits-charges-and-parklands>

Each year, the Ministry of Municipal Affairs and Housing (MMAH) publishes an affordability bulletin that sets out income-based purchase price and rent thresholds for residential units across Ontario. These thresholds are used to determine eligibility for development charge exemptions and other affordability-related policies under the Development Charges Act and the Planning Act. The benchmarks presented below reflect the 2024 figures applicable to Strathroy-Caradoc, and serve as a reference point for assessing housing affordability in the local context.

These thresholds are used as a benchmark to assess the affordability of new housing supply. The following table presents the 2024 affordable ownership and rental thresholds for Strathroy-Caradoc, calculated using this methodology.

	Single Detached	Semi-Detached	Row / Townhouse	Condo Apartment
Affordable Price (MMAH)	\$380,900	\$380,900	\$380,900	\$380,900
	Bachelor Apt	1 Bed Apt	2 Bed Apt	3+ Bed Apt
Affordable Rent (MMAH)	\$957	\$1,072	\$1,557	\$1,706

Source: 2024 MMAH Affordability Benchmark Bulletin

4.3.2 Strathroy-Caradoc Growth Projections

The following population and household projections are provided to help summarize expected housing/household growth in the Municipality, further contextualizing the need to support more diverse, affordable, and attainable housing options. Two key sources are referenced below: (1) Household Projections based on the Housing Assessment Resource Tool (HART) methodology and; (2) Population and Housing Forecasts based on the growth analysis prepared by Watson & Associates for Middlesex County in 2025. Each of these sources are summarized in this section.

It should be noted that while the HART methodology provides an estimate of future households largely by income level, it only projects to 2031 and uses a line of best fit from historical census data. The Watson forecasts provide a more robust projection for overall population and housing growth based on more recent data, provincial guidelines, and robust methodologies, in addition to historical census data. It should be further noted that the Watson projections are the preferred source for estimating future growth; however, the HART projections still provide value in helping to understand the share of households by income level in the near future. To this end, each should be read in conjunction with one another.

1. Housing Assessment Resource Tool (HART) Household Projections

<https://hart.ubc.ca/housing-needs-assessment-tool/>

Projections from the Housing Assessment Resource Tool (HART) have been used to estimate changes in the number and type of households in Strathroy-Caradoc by 2031 – mainly to help anticipate future housing need based on household income. These projections follow a “business as usual” methodology, using a line of best fit based on Census data from 2006, 2016, and 2021. As such, they do not account for recent or future policy shifts, in-migration trends, or regional market pressures, but they do offer a useful baseline for considering the scale and composition of housing demand if current trends continue.

The projections provide an estimated change in total households by income category (using CMHC-aligned affordability thresholds), household size, and a cross-tabulation of income category by household size. This information can help inform CIP program design by highlighting the need for affordable, family-oriented, or smaller-unit rental and ownership housing in the coming years. While not prescriptive, these trends serve as a valuable input for priority-setting and may assist in identifying gaps or opportunities for targeted incentive programming.

Household Projections by Income Category 2021 to 2031

HH Income Category	2021 HHs	Projected Gain/Loss of HHs by 2031	Total
Very Low Income	245	50	295
Low Income	1580	129	1709
Moderate Income	1720	124	1844
Median Income	2085	227	2312
High Income	3665	431	4096
Total	9295	961	10256

Source: HART Housing Needs Assessment Tool, Strathroy-Caradoc

Household Projections by Household Size 2021 to 2031

HH Size	2021 HHs	Projected Gain/Loss of HHs by 2031	Total 2031 HHs
1 Person	2205	427	2632
2 Person	3550	569	4119
3 Person	1440	97	1537
4 Person	1330	-37	1293
5+ Person	775	-81	694
Total	9300	975	10275

Source: HART Housing Needs Assessment Tool, Strathroy-Caradoc

Household Projections by Household Size and Income Category

HH Income Category	1 Person	2 Person	3 Person	4 Person	5+ Person	Total
Very Low Income	278	28	0	0	0	306
Low Income	1288	365	41	26	0	1720
Moderate Income	689	914	237	96	7	1943
Median Income	221	1383	342	157	101	2204
High Income	152	1436	921	1006	592	4107
Total	2628	4126	1541	1285	700	10280

Source: HART Housing Needs Assessment Tool, Strathroy-Caradoc

2. Middlesex County Growth Forecast for Population and Housing Units 2025

Middlesex County Growth Analysis Update – Final Report, Watson & Associates Economists Ltd. 2025

Population Projections are included within the County's Official Plan and are intended to be used by the County, local municipalities and others to assist in managing growth and development. In 2025, Watson & Associates Economists (Watson) were engaged to update the County's projections to reflect Provincial changes in required methodology and shifts in growth patterns in the region. As part of this work, four population growth scenarios (Low, Medium, Medium-High and High) were prepared specific to Middlesex

County without the City of London. Of the four long-term growth scenarios prepared for Middlesex County, Watson recommended the Medium-High Growth Scenario as the preferred forecast. Under this scenario, the County's population is expected to grow to 151,500 by 2056, representing an average annual growth rate of 1.8%.

As part of this work, Watson prepared summary forecast tables for each municipality, grounding the Medium-High County Growth Scenario within local contexts. The table below is sourced from Figure F-13 of the Watson report and summarizes Strathroy-Caradoc's population and housing growth forecasts from 2026 to 2056.

Strathroy Caradoc Population and Housing Forecast, 2026 to 2056

Year		Population (Including Census undercount) ^[1]	Housing Units					Persons Per Unit (P.P.U.) with undercount
			Low Density ^[2]	Medium Density ^[3]	High Density ^[4]	Other	Total Households	
Historical	Mid-2001	20,000	5,780	270	900	50	6,990	2.86
	Mid-2006	20,900	6,110	330	900	170	7,500	2.78
	Mid-2011	21,900	6,490	290	1,010	180	7,970	2.75
	Mid-2016	21,800	6,770	320	1,030	190	8,300	2.63
	Mid-2021	25,000	7,520	460	1,270	220	9,460	2.64
Forecast	Mid-2026	27,500	8,190	610	1,490	220	10,510	2.61
	Mid-2031	30,900	9,060	760	1,790	220	11,830	2.61
	Mid-2036	34,400	9,940	930	2,060	220	13,150	2.61
	Mid-2041	37,900	10,780	1,170	2,340	220	14,520	2.61
	Mid-2046	41,200	11,660	1,480	2,660	220	16,020	2.57
	Mid-2051	44,800	12,590	1,820	2,960	220	17,600	2.55
	Mid-2056	47,300	13,440	2,160	3,190	220	19,010	2.49

Source: Middlesex County Growth Analysis Update – Final Report, Watson & Associates Economists Ltd. 2025, Figure F-13 (table modified by Re:Public Urbanism)

4.4.0 Estimating the Cost of Construction for Different Unit Types

To support future program design and inform the level of municipal incentives that may be required, high-level construction cost estimates were prepared for Lucan Biddulph, North Middlesex, and Strathroy-Caradoc. These estimates are based on the 2025 Altus Group Canadian Cost Guide, using per-square-foot benchmarks from GTA Suburban market due to the absence of localized data. Given the Q2 2025 Statistics Canada Construction Price Index for the London area is 98.3% of the Toronto index, these benchmark prices provide an accurate price range to rely on for this analysis.

The cost estimates were developed for four standard housing typologies having the following gross floor areas (per unit):

- Row Townhouse (120 m² / 1,292 ft²)
- Single Detached Home (180 m² / 1,938 ft²)
- 3-Storey Stacked Townhouse (100 m² / 1,076 ft²)
- Up to 6-Storey Condominium Apartment (102 m² / 1,098 ft², inclusive of 20% per unit for common area)

All figures reflect hard construction costs as identified in the Altus Group Canadian Cost Guide, as well as municipal development charges and building permit fees. Estimates assume shovel-ready sites requiring no planning approvals and exclude additional costs related to servicing, site plan approval, or structured parking.

To assess feasibility from an affordability standpoint, each unit type is compared to the 2024 Provincial Affordable Purchase Price Benchmark for the corresponding municipality. These benchmarks are based on income thresholds and assume standard mortgage conditions (e.g., 5% down payment, 25-year amortization, 5-year fixed rate).

This comparison is important because it helps illustrate whether delivering housing at an "affordable" price is financially viable under current cost conditions. Where estimated construction costs exceed the affordability benchmark, it signals a potential viability gap that may require municipal incentives - such as CIP grants, fee relief, or DC exemptions - to make the project attractive to developers or feasible for non-profit delivery.

4.4.1 Lucan Biddulph Construction Cost Estimates

Construction cost estimates for Lucan Biddulph suggest that stacked townhouses and mid-rise condominiums are the most consistently aligned with 2024 affordability thresholds, particularly when using Ottawa-based benchmarks. These typologies fall below or close to the affordable purchase price, suggesting that they may be viable without deep subsidy under favourable cost conditions. Row townhouses also remain within range across both benchmarks, though they sit closer to the affordability ceiling under GTA assumptions. Single detached units, however, exceed the affordability threshold under the GTA cost scenario and would likely require incentive support to be delivered affordably. These findings suggest that modest financial interventions, such as fee relief or CIP grants, may help close feasibility gaps, especially for larger unit types or higher-cost builds.

Lucan Biddulph Construction Cost Estimates by Unit Type

Unit Type	Cost Range		2024 Affordability Benchmark
	Low	High	
Row Townhouse	\$303,023	\$380,523	\$431,200
Single Detached	\$427,718	\$573,031	\$431,200
3 Storey Stacked Townhouse	\$285,801	\$328,856	\$414,000
Up to 6 Storey Condo	\$285,635	\$378,958	\$414,000

Source: Re:Public Urbanism Analysis using Altus 2025 Canadian Cost Guide, 2024 MMAH Affordability Benchmark Bulletin, and local Municipal Fees & Charges

4.4.2 North Middlesex Construction Cost Estimates

In North Middlesex, construction cost estimates indicate that stacked townhouses and row dwellings are generally within or near affordability thresholds across both GTA and Ottawa cost assumptions. These forms represent promising candidates for attainable ownership housing in the local market. Mid-rise condominiums and single detached units, by contrast, exceed affordability thresholds under GTA-based estimates and would likely require support to be delivered affordably. However, under Ottawa-based cost assumptions, even detached units may become viable, depending on site conditions and delivery models. These variations highlight the importance of tailoring CIP incentives to typology and cost context, especially where higher-cost forms are necessary to meet community demand.

North Middlesex Construction Cost Estimates by Unit Type

Unit Type	Cost Range		2024 Affordability Benchmark
	Low	High	
Row Townhouse	\$289,148	\$366,648	\$377,300
Single Detached	\$420,719	\$566,032	\$377,300
3 Storey Stacked Townhouse	\$271,926	\$314,981	\$377,300
Up to 6 Storey Condo	\$292,353	\$385,676	\$377,300

Source: Re:Public Urbanism Analysis using Altus 2025 Canadian Cost Guide, 2024 MMAH Affordability Benchmark Bulletin, and local Municipal Fees & Charges

4.4.3 Strathroy-Caradoc Construction Cost Estimates

In Strathroy-Caradoc, estimated construction costs for row townhouses, stacked townhouses, and mid-rise apartments generally fall within or just above affordability thresholds, depending on the cost scenario used. These forms are likely to represent the most feasible paths for near-term attainable housing delivery. Single detached units, however, consistently exceed affordability benchmarks under GTA-based estimates and may face challenges without incentive support or alternative delivery mechanisms. Given Strathroy-Caradoc's size, population growth, and service centre role, supporting mid-density and compact housing forms through targeted CIP programming will be key to enabling diverse and affordable housing options.

Strathroy-Caradoc Construction Cost Estimates by Unit Type

Cost Per Unit	Strathroy-Caradoc		2024 Affordability Benchmark
	Low	High	
Row Townhouse	\$295,893	\$373,393	\$380,900
Single Detached	\$423,338	\$568,651	\$380,900
3 Storey Stacked Townhouse	\$278,670	\$321,726	\$380,900
Up to 6 Storey Condo	\$289,960	\$383,283	\$380,900

Source: Re:Public Urbanism Analysis using Altus 2025 Canadian Cost Guide, 2024 MMAH Affordability Benchmark Bulletin, and local Municipal Fees & Charges

4.4.4 Summary Observations

Key Trends Across Municipalities

Across all three municipalities, the construction cost analysis reveals that stacked townhouses and mid-rise apartments are the most consistently aligned with 2024 affordability benchmarks. These typologies offer compact, efficient forms that appear to be financially viable with minimal subsidy, especially under lower-cost construction scenarios. Row townhouses remain feasible in many cases, though their affordability is more sensitive to regional construction costs. In contrast, single detached units are the least likely to meet affordability thresholds, particularly under GTA-based cost estimates, and would typically require substantial incentives or alternative models (e.g., non-profit or co-op delivery) to be delivered affordably.

Implications for CIP Program Design

These findings reinforce the importance of targeting CIP incentives toward mid-density housing forms, including stacked townhomes, small apartment buildings, and row housing, where cost efficiency and affordability alignment are strongest. Calibrating incentives to reflect the gap between estimated development costs and affordability thresholds will help municipalities deploy resources strategically, ensuring that public investment meaningfully contributes to housing delivery at price points that meet local need.

5.0 CIP Review & Gap Analysis

5.1.0 Lucan Biddulph

CIP Details:

Lucan Biddulph adopted its CIP in 2021. The plan is structured around five guiding principles:

- Balanced Growth
- Community Accessibility & Mobility
- Supporting Recreation & Public Space
- Supporting Culture, Heritage, & Identity
- Main Street Beautification

The CIP includes seven incentive programs aimed at supporting local revitalization, infill, and economic development objectives. Between 2022 and 2024, only the Beautification and Accessibility programs were actively implemented. As of 2025, the Township had taken steps to activate its housing-related incentive programs in an effort to respond to growing housing needs.

5.1.1 Housing-Focused Incentive Programs

Conversion, Expansion, & Redevelopment Program

This program is intended to support private sector investment in the redevelopment, renovation, and/or expansion of commercial and mixed-use buildings (generally interior) to improve their viability for accommodating a new or expanded commercial/service activity. This program also seeks to support and encourage some limited residential development through the conversion of existing space within a mixed-use building to accommodate new residential units. This Program further provides additional assistance with some of the costs associated with Environmental Site Assessment (ESA) works which may be associated and/or required as part of a (re)development project, reducing the barriers to the redevelopment of key strategic properties in the Township.

Eligible Costs	Funding Support
Construction Cost Match	50% up to \$5,000
Planning & Building Fees	50% up to \$2,500
Consulting Fees	50% up to \$2,500
Phase I or II ESA Costs	50% up to \$5,000
Total Combined Maximum	\$15,000

Additional Residential Unit Program

This program is intended to encourage the creation of new residential (rental) units in the Township in an effort to help diversify the housing base, as well as provide more affordable housing options. This program is also intended to assist property owners with the costs associated with bringing non-compliant units up to code to legalize existing units and ensure the safety and wellbeing of tenants is maintained.

Eligible Costs	Funding Support
Construction Cost Match	50% up to \$5,000
Planning & Building Fees	50% up to \$2,500
Consulting Fees	50% up to \$1,500
Total Combined Max	\$9,000

Affordable Rental Housing Unit Program

Similar to the Additional Residential Unit Program, the Affordable Rental Housing Unit Program is intended to encourage the creation of new affordable rental units in the Township to help diversify the housing base and provide more housing options. This will be done through the relief of various municipal development fees that would typically be applicable to projects involving the creation of new residential units. The Township and applicants will be encouraged to coordinate any prospective affordable housing projects with local/regional housing service providers or agencies (ex. London & Middlesex Community Housing).

Eligible Costs	Funding Support
Construction Cost Match	15% up to \$5,000 per unit, up to 4 units
Planning & Building Fees	100% up to \$5,000 per project
Consulting Fees	50% up to \$2,500 per project
Development Charge Reduction	80% waiver of DCs per project
Total Combined Max	\$27,500 + 80% DC waiver

5.1.2 Gap Analysis & Areas for Improvement

- **Program Design Is Strong, But Scale Is Limited:** Lucan Biddulph's CIP includes several well-structured programs that reflect an understanding of local housing needs. However, the grant amounts offered are relatively modest and may not be sufficient to meaningfully improve the financial viability of new or affordable housing projects.
- **Recent Program Activation Means Impact Is Still Emerging:** Because the Township's housing-focused programs were only activated in 2024, uptake data is not yet available. As implementation proceeds, Lucan Biddulph may wish to monitor uptake patterns and identify which incentives generate the strongest interest and outcomes.
- **Consider Scalable Tools Like TIEGs:** The Township may wish to explore offering a Tax Increment Equivalent Grant (TIEG) as part of its CIP portfolio. A TIEG provides longer-term, higher-value support without requiring significant upfront capital — offering an incentive that scales with development value while limiting immediate budget impacts.
- **Refine Affordability Definitions:** The CIP's current affordability language should be reviewed and potentially aligned with area median income (AMI) or CMHC market rent thresholds. This would improve transparency and help ensure accountability over the affordability of units benefiting from municipal support.
- **Refocus Development Charge Relief to Where It Adds Value:** Development charge relief continues to be a high-impact incentive within the CIP toolkit, particularly in smaller communities where DCs can represent a meaningful share of upfront

development costs. However, recent amendments to the Development Charges Act (effective June 1, 2024) have introduced province-wide exemptions and discounts for specific housing types:

- Full DC exemption for non-profit housing;
- Full DC exemption for affordable and select attainable residential units;
- Discounts of up to 25% for qualifying purpose-built rental units.

As a result, the Township may wish to target local DC relief more selectively, focusing on housing projects that do not otherwise qualify for provincial exemptions, such as moderately priced rentals, ownership units near affordability thresholds, or infill projects that would benefit from local policy alignment.

5.2.0 North Middlesex

CIP Details:

The Municipality of North Middlesex adopted its Community Improvement Plan (CIP) in 2021. The plan is structured around five guiding principles:

- Main Street Beautification & Revitalization
- Rural Economic Health and Vitality
- Housing Choice & Affordability
- Maintaining Community Character
- “More in the Core!” (supporting investment in core areas and public spaces)

The CIP includes seven incentive programs, several of which are directly aimed at encouraging housing development and the adaptive reuse of existing buildings. These programs provide a strong policy and implementation foundation for supporting local housing objectives.

5.2.1 Overview of existing Housing-Focused Programs

Conversion, Expansion, & Redevelopment Program

This program is intended to support private sector investment in the redevelopment, renovation, and/or expansion of commercial and mixed- use buildings (generally interior) to improve their viability for accommodating a new or expanded commercial/service activity. This program also seeks to support and encourage some limited residential development through the conversion of existing space within a mixed-use building to accommodate new residential units.

Eligible Costs	Funding Support
Construction Cost Match	50% up to \$5,000
Planning & Building Fees	50% up to \$5,000
Consulting Fees	50% up to \$2,500
Total Combined Max	\$12,500
Interest-Free Loan	50% up to \$20,000

Additional Residential Unit Program

This program is intended to encourage the creation of new residential (rental) units in the Municipality in an effort to help diversify the housing base, as well as provide more affordable housing options. This program is also intended to assist property owners with the costs associated with bringing non-compliant units up to code to legalize existing units and ensure the safety and wellbeing of tenants is maintained.

Eligible Costs	Funding Support
Construction Cost Match	50% up to \$5,000
Planning & Building Fees	50% up to \$2,500
Consulting Fees	50% up to \$1,500
Total Combined Max	\$9,000

Affordable Rental Housing Unit Program

Similar to the Additional Residential Unit Program, the Affordable Rental Housing Unit Program is intended to encourage the creation of new affordable rental units in the Municipality to help diversify the housing base and provide more housing options. This will be done through the relief of various municipal development fees that would typically be applicable to projects involving the creation of new residential units. The Municipality and development community will be encouraged to coordinate any prospective affordable housing projects with local/regional housing service providers or agencies (ex. London & Middlesex Community Housing).

Eligible Costs	Funding Support
Construction Cost Match	15% up to \$5,000 per unit, up to 4 units
Planning & Building Fees	100% up to \$5,000
Consulting Fees	50% up to \$2,500
Development Charge Reduction	80% waiver of DCs per project
Total Combined Max	\$27,500 + 80% DC waiver

5.2.2 Gap Analysis & Areas for Improvement

- **Program Design Is Solid, But Scale Is a Limiting Factor:** North Middlesex's housing-related programs are well-structured and address a range of unit types and development formats. However, as with many small municipalities, the grant amounts currently offered are unlikely to substantially influence the economics of new housing or affordable development, particularly in higher-cost construction contexts.
- **Funding Limitations Are a Common Constraint:** Offering significantly higher grants would likely place pressure on other local priorities. While the intent is clear and the framework is in place, resource limitations will remain a challenge without external funding or new financing tools.
- **Consider Phased or Scalable Incentives:** The Municipality may wish to explore the addition of a Tax Increment Equivalent Grant (TIEG), which offers longer-term support through a share of post-development tax uplift. This type of incentive enables higher-value assistance over time, without requiring large up-front capital expenditures.
- **Refine Affordability Definitions:** The program definition for "affordable rental housing" could be strengthened by tying it explicitly to Area Median Income (AMI) or average market rent thresholds, ensuring that projects supported through CIP funding remain within affordability parameters for a defined period.
- **Refocus Development Charge Relief to Where It Adds Value:** Development charge relief continues to be a high-impact incentive within the CIP toolkit, particularly in smaller communities where DCs can represent a meaningful share of upfront development costs. However, recent amendments to the Development Charges Act (effective June 1, 2024) have introduced province-wide exemptions and discounts for specific housing types:
 - Full DC exemption for non-profit housing;
 - Full DC exemption for affordable and select attainable residential units;

- Discounts of up to 25% for qualifying purpose-built rental units.

As a result, the Municipality may wish to target local DC relief more selectively, focusing on housing projects that do not otherwise qualify for provincial exemptions, such as moderately priced rentals, ownership units near affordability thresholds, or infill projects that would benefit from local policy alignment.

5.3.0 Strathroy Caradoc

CIP Details:

Strathroy-Caradoc adopted its Community Improvement Plan (CIP) in 2020, establishing a comprehensive suite of incentive programs to support intensification, downtown revitalization, and housing affordability. The CIP is structured around five guiding principles:

- Housing for All
- Beautiful Space, Place, & Identity
- Strong Culture & Heritage
- Destination through Reinvigoration
- Economic Opportunity, Rural Diversity, & Agri-Tourism

The CIP features 10 incentive programs, including multiple streams that address housing construction, infill development, and downtown revitalization. Relative to its peers, Strathroy-Caradoc offers more funding programs and higher-value incentives, positioning it well to support a range of housing outcomes.

5.3.1 Overview of existing Housing-Focused Programs

Intensification & Redevelopment Program

The intensification and redevelopment program is intended to promote the rehabilitation of properties which may require improvements to comply with minimum code requirements, and support the functional redevelopment and renovation of buildings or properties necessary for new or expanded uses. This program also encourages infill projects to increase the efficient use of lands and services within the core areas of the Municipality. The goal of this program is to reinvigorate the core areas of economic activity in the Municipality by supporting a diverse range of uses, encouraging repurposing of buildings, and incentivising the development of vacant or underdeveloped properties.

Eligible Costs	Funding Support
Construction Cost Match (barrier-free improvements only)	50% up to \$10,000
Planning & Building Fees	50% up to \$10,000
Consulting Fees	50% up to \$5,000
Total Combined Max Grant	\$25,000
Brownfield Study Grant	50% up to \$25,000
Tax Increment Grant	10 Years / 100% Year 1 / 10% Annual Decrease

Additional Unit Program

The additional unit program is designed to assist property owners with the cost of creating new residential rental units on eligible properties. In addition to new units, this program will also assist property owners with costs associated with bringing non-compliant units up to code to legalize existing units and ensure the safety and wellbeing of tenants is maintained. This program is intended to encourage an increase in the stock and diversity of rental housing options throughout the Municipality as well as allow for increased density in built-up urban areas with larger lot fabrics.

Eligible Costs	Funding Support
Construction Cost Match (barrier-free improvements only)	25% up to \$15,000
Planning & Building Fees	75% (no max)
Consulting Fees	50% up to \$1,500
Total Combined Max Grant	\$16,500 + 75% of Planning/Building Fees

Downtown Rental Housing Program

The downtown rental housing program is designed to assist property owners with the costs of developing rental housing units within the downtown areas of Strathroy and Mount Brydges. The two main goals of this program are to encourage more development and infill within the core areas of the community and reduce the rate at which urban settlement areas are expanding; thereby reducing servicing costs, impacts on the environment, and less reliance on vehicular travel around the community. This program is intended to encourage an increase in the stock, density, and diversity of residential land uses in our downtown areas - increasing the opportunities to live, work, and play.

Eligible Costs	Funding Support
Construction Cost Match	15% up to \$15,000 per unit
Planning & Building Fees	50% (no max)
Consulting Fees	50% up to \$5,000
Total Combined Max Grant	\$15,000 per unit + \$5,000 and 50% of Planning/Building Fees per project
Tax Increment Grant	10 Years / 100% Year 1 / 10% Annual Decrease

Attainable Housing Program

The attainable housing program is intended to encourage the development of attainable rental housing in Strathroy and Mount Brydges through the provision of financial incentives. These will seek to ease the financial burden of attainable housing development and increase the number of available units.

Eligible Costs	Funding Support
Construction Cost Match	15% up to \$15,000 per unit
Planning & Building Fees	100% (no max)
Consulting Fees	50% (no max)
Development Charge Reduction	80%
Total Combined Max Grant	\$15,000 per unit + 100% Planning/Building Fees + 50% of Consulting Fees + 80% DC Relief
Tax Increment Grant	10 Years / 100% Year 1 / 10% Annual Decrease

5.3.2 Gap Analysis & Areas for Improvement

- Program Diversity Is a Strength, But Focus Is Key: Strathroy-Caradoc has one of the most comprehensive CIPs in the County, with a variety of housing-related incentives. However, there is a risk that too many programs with overlapping purposes may dilute administrative focus and limit uptake. Consolidating or streamlining certain programs could improve clarity and effectiveness.

- **Grant Amounts Are Competitive but May Still Fall Short:** Compared to its peers, Strathroy-Caradoc offers higher-value grants, particularly under the Attainable Housing and Downtown Rental Housing programs. However, even these amounts may fall short of meaningfully shifting project feasibility for developers — especially for higher-density or deeply affordable projects.
- **Allow Program Stacking and Expand TIG Flexibility:** The Municipality should consider formally allowing the Tax Increment Grant (TIG) to be combined with other CIP grants in strategic cases, enabling stronger overall incentives. Additionally, Strathroy-Caradoc may wish to extend the TIG duration to 20 years or more for high-impact or deeply affordable housing projects, providing sustained support without immediate capital impacts.
- **Refine Affordability Definitions:** As in the other municipalities, Strathroy-Caradoc may benefit from refining its definition of “affordable rental housing” by tying it to Area Median Income (AMI) or average market rent thresholds. This would help ensure that units developed through the CIP remain affordable for the duration of support.
- **Refocus Development Charge Relief to Where It Adds Value:** Development charge relief continues to be a high-impact incentive within the CIP toolkit, particularly in smaller communities where DCs can represent a meaningful share of upfront development costs. However, recent amendments to the Development Charges Act (effective June 1, 2024) have introduced province-wide exemptions and discounts for specific housing types:
 - Full DC exemption for non-profit housing;
 - Full DC exemption for affordable and select attainable residential units;
 - Discounts of up to 25% for qualifying purpose-built rental units.

As a result, the Municipality may wish to target local DC relief more selectively — focusing on housing projects that do not otherwise qualify for provincial exemptions, such as moderately priced rentals, ownership units near affordability thresholds, or infill projects that would benefit from local policy alignment.

5.4 Aligning Existing CIP Programs with Strategic Recommendations in Attainable Housing Review

The recommendations from the Middlesex County Attainable Housing Review Final Report align closely with existing CIP tools across Lucan Biddulph, North Middlesex, and Strathroy-Caradoc. Each municipality currently offers programs that support additional residential units, affordable or attainable rental housing, downtown conversions, and limited tax increment relief. These tools provide a solid foundation to address local housing needs. However, opportunities exist to enhance the reach and impact of these programs by:

- Adjusting maximum funding levels;
- Expanding eligibility criteria;
- Strengthening alignment with affordability definitions and housing needs projections;
- Introducing climate resilience or equity-based eligibility components.

The following table outlines how select recommendations from the housing review can be operationalized or scaled up within the existing CIP frameworks of the three municipalities:

Recommendation from Housing Review	Corresponding CIP Tool / Mechanism
Adopt affordability targets for rental and ownership housing	Integrate clear affordability definitions and thresholds (e.g., CMHC or MMAH guidance) into CIP eligibility or evaluation scoring systems
Expand financial incentives for affordable/supportive housing	Scale up grant/loan amounts in existing programs; prioritize applications from non-profit, Indigenous, or supportive housing providers
Waive or rebate municipal fees and charges	Maintain 100% fee relief for affordable units; ensure integration with new DC exemption policies under the Development Charges Act
Promote missing middle and infill housing	Tailor existing programs (e.g., ARU, downtown rental, redevelopment grants) to better support multiplexes, small-scale apartments, and multi-unit conversions
Prioritize surplus land and key opportunity sites	Pair CIP incentives with municipally owned land, or pre-zone/pre-service strategic sites for attainable housing
Support climate-resilient and energy-efficient development	Introduce bonus grants or top-up incentives for affordable units that exceed code requirements or meet third-party energy certifications
Streamline approvals for priority projects	Link CIP eligibility to fast-track approvals or delegated planning processes; pre-qualify projects with affordability commitments
Expand access for community housing providers and equity-deserving groups	Ensure program eligibility explicitly includes non-profits, co-ops, Indigenous-led providers, and transitional/supportive housing proponents

5.5 Enhancing CIP Programs: Strategic Improvements and Augmentations

Lucan Biddulph, North Middlesex, and Strathroy-Caradoc have all adopted CIPs that support a diverse range of housing objectives, including ARU development, affordable rental supply, and mixed-use infill. As detailed in Sections 5.1–5.3, the current frameworks reflect strong alignment with the intent of the HAF and the County’s broader housing goals.

However, each municipality faces common challenges related to funding scale, incentive targeting, and administrative capacity. The following enhancements are recommended to increase program uptake and improve the cost-effectiveness and impact of municipal incentives:

1. Strengthen Support for Deep Affordability and Non-Profit Delivery

While current programs provide modest cost-sharing and DC relief, few differentiate between affordability levels. Municipalities may consider:

- Introducing tiered incentives based on affordability depth (e.g., 100% AMR, 80% AMR, RGI).
- Prioritizing or enhancing incentives for non-profit, Indigenous, or supportive housing providers.
- Structuring programs to support collaborations with regional housing providers (e.g., LMCH, Middlesex County Housing).

2. Expand Climate-Resilient and Green Construction Incentives

None of the current programs specifically reward projects that exceed Ontario Building Code standards. Suggested enhancements include:

- Adding “green bonus” top-ups for passive design, net-zero readiness, or low-carbon construction.
- Incentivizing water conservation and climate-smart infrastructure, especially in constrained servicing areas.
- Aligning with CMHC’s Net-Zero Ready or EnerGuide frameworks where feasible.

3. Increase Maximum Grant Values and Adjust Cost-Matching Formulas

Construction costs have escalated substantially, reducing the impact of many existing grants. Municipalities should consider:

- Increasing maximum per-unit and per-project funding limits, especially for multi-unit or infill housing.
- Raising cost-sharing ratios for priority housing types.
- Indexing grant ceilings annually to reflect construction inflation or material cost increases.

4. Enhance Support for Mid-Scale Infill and Missing Middle Development

While ARUs are well-supported, mid-density formats such as triplexes, fourplexes, and walk-up apartments often receive the same funding as minor conversions. Possible solutions:

- Introduce a dedicated “missing middle” grant stream or top-up.
- Offer larger TIEGs for projects over a unit threshold (e.g., 3+ units).
- Adjust zoning or CIP boundaries to ensure eligibility for mid-scale projects in serviced areas.

5. Improve Program Visibility, Navigation, and Coordination

Some existing programs remain underutilized due to lack of awareness or administrative hurdles. Municipalities may wish to:

- Simplify application forms and clearly communicate available incentives.
- Offer pre-application coaching or assign staff champions for CIP-eligible projects.
- Establish internal protocols to flag eligible applicants at the time of building permit, zoning, or pre-consultation meetings.

6. Leverage Tax Increment Grants (TIEGs) More Strategically

Strathroy-Caradoc has implemented TIEGs within its CIP, but there is room to scale up and replicate success. Suggestions include:

- Introduce TIEGs in Lucan Biddulph and North Middlesex, especially for larger affordable rental or infill projects.
- Tie TIEG eligibility to affordability or green performance criteria.
- Combine TIEGs with surplus land strategies or broader public-private partnerships to build out the capital stack for complex housing developments.

CIPs as a Tool for Limiting Sprawl

Beyond their financial role, Community Improvement Plans can also act as strategic policy levers to help municipalities manage growth and direct development. With the removal of the requirement for Municipal Comprehensive Reviews (MCRs) under the updated PPS, former policy mechanisms available to contain sprawl and guide intensification have been loosened. In this context, CIP programming becomes especially valuable: by offering targeted incentives for infill, rental housing, and compact forms within existing urban serviced areas, municipalities can offset some of the barriers to intensification. When paired with clear affordability, sustainability, and design criteria, CIPs can help close feasibility gaps while providing a practical means of aligning local development patterns with long-term growth objectives and infrastructure planning.

6.0 Jurisdictional Scan

6.1 Overview

A review of CIPs across a range of Ontario municipalities, including Penetanguishene, Barrie, Blue Mountains, Cambridge, Goderich, Peterborough, Sarnia, and Welland, reveals a number of consistent practices and emerging innovations in the design and delivery of affordable and sustainable housing incentive programs. Select CIPs also incorporate broader sustainability measures, as observed in municipalities such as Waterloo and Kingston. This scan highlights key components of these plans and identifies transferable approaches relevant to the development or refinement of local CIP tools.

Geographic Scope and Flexibility

CIP boundaries vary depending on local goals and planning context. Many municipalities designate the entire settlement or municipal area as the Community Improvement Project Area (CIPA), particularly where incentives are intended to support a wide distribution of affordable or sustainable development. Others introduce more spatially refined criteria, either by delineating targeted CIPAs or through the use of evaluation frameworks that prioritize projects located near key infrastructure, transit, and amenities. Some municipalities are also beginning to factor climate vulnerability into location-based prioritization. This flexible geographic approach allows for both broad applicability and strategic focus where necessary.

Policy Objectives and Guiding Principles

Affordable Housing CIPs typically seek to increase the supply of housing that meets the needs of low- and moderate-income households. Sustainable Housing CIPs, by contrast, prioritize the construction or retrofit of buildings to meet energy efficiency targets, reduce greenhouse gas emissions, and enhance the long-term resilience and environmental performance of the built form. Both types of CIPs often include secondary objectives such as improving urban design quality, expanding housing choice, enhancing the public realm, and addressing localized social or environmental priorities.

Use of Agreements and Conditions of Funding

Funding through CIPs is frequently contingent upon the execution of agreements between the municipality and the applicant. These agreements are used to reinforce compliance with program conditions, such as ensuring affordable units are not converted to short-term rentals and specifying how long a unit must remain affordable. Where feasible, municipalities streamline administration by structuring programs to minimize post-disbursement monitoring—often requiring proof of work completion (e.g., photographs or invoices) rather than formal inspection. The terms of affordability, sustainability performance, and any associated monitoring obligations are often scaled to reflect the nature and size of the incentive provided.

Monitoring and Evaluation Frameworks

Several municipalities have embedded performance tracking mechanisms into their CIPs, typically in the form of an internal database and an annual reporting process. These frameworks capture both application data (e.g., inquiries, consultations) and outcome indicators, such as the number and type of housing units created, affordability duration, uptake of sustainability features, and grant utilization rates. Public-facing “report cards” or

annual summaries support transparency and accountability, and also allow municipalities to assess the impact of their programs over time.

Incentive Program Structures

Across jurisdictions, a common suite of incentive tools includes:

- Tax increment grants (TIGs)
- Development charge waivers or grants
- Rebates or waivers for planning and building permit fees
- Feasibility study grants
- Grants for the construction or conversion of additional dwelling units
- Sustainability and retrofit grants
- Land-banking or land-lease initiatives
- General construction cost matching for materials/labour

Some municipalities have supplemented this base set with low-interest loan programs or surplus land disposition frameworks. The latter often involve identifying municipally owned lands deemed surplus and offering them through a Request for Proposals (RFP) process to facilitate affordable housing development. Land-lease options have also emerged as a mechanism to preserve long-term affordability while avoiding full land divestment.

6.2 Best/Common Practices for Programming

Tax Increment Grants

Tax increment grants are a widely used incentive that provide partial relief from increased property taxes following development. Best practice suggests that the duration of the grant align with the affordability period of the housing units being delivered. Municipalities have also used tiered grant structures to reward projects that incorporate a higher proportion of affordable units or demonstrate exemplary sustainable design. In some cases, such as Windsor, grant durations are extended by up to five years where affordable units comprise at least 20% of a development. Structured intakes (e.g., semi-annual calls for proposals) and application scoring systems, based on affordability, urban design, sustainability, and location, are increasingly used to ensure that funds are directed to high-quality projects.

Relief from Municipal Fees

Waiving or refunding municipal fees—such as planning application costs, building permits, and parking requirements—has proven particularly helpful for smaller-scale projects and for non-profit proponents. Many municipalities cap these grants to ensure proportionality relative to overall project costs. Municipal fee relief not only reduces upfront costs, but also allows municipalities to include performance conditions (e.g., minimum affordability duration) as part of the funding agreement.

Development Charge Relief

While Bill 23 now exempts certain housing types (e.g., non-profit and co-op housing) from development charges, other approaches remain relevant. Municipalities continue to offer

development charge grants or deferrals as part of their CIP tools, allowing greater control over program design and eligibility. Using grants rather than by-law exemptions enables municipalities to maintain minimum standards, set funding limits annually, and require binding agreements to secure long-term affordability outcomes.

Support for Additional Residential Units

Incentives for additional units—such as secondary suites or garden suites—are typically scaled to reflect the smaller size and lower development value of these projects. Municipalities have targeted fee waivers, inspection cost relief, and minor grants to facilitate unit creation, particularly in low-rise contexts. These programs complement recent legislative changes (e.g., as-of-right zoning for additional units) and support housing diversity and intensification in existing neighbourhoods.

Program Administration and Selection Process

Many municipalities have adopted a dual-stream approach to program intake: semi-annual or quarterly application windows for larger, more complex projects, and continuous intake for smaller-scale initiatives. Transparent evaluation processes, including pre-application consultations and published scoring rubrics, are emphasized to ensure fairness and clarity. Once eligibility and evaluation criteria are approved by Council, decisions are often delegated to municipal staff to streamline implementation—while land disposition decisions typically remain within the purview of Council.

6.3 Best/Common Practices for Affordable Housing CIP Structure

Definitions of Affordability

- CMHC benchmarks or regional average market rents
- A cap of 30% of gross household income
- Eligibility thresholds ranging from 50% to 130% of median income (e.g., Blue Mountains)
- Some municipalities (e.g., Goderich and Sarnia) incorporate living wage metrics or refer to standards under the More Homes, Built Faster Act (2022).

Common Incentive Program Types

Tax Increment Grant (TIG) or Equivalent

- Rebates the municipal property tax increase resulting from development.
- Commonly structured to phase out over 5 to 20 years.
- Enhanced durations or grant rates are available where projects meet additional criteria (e.g., sustainability or heritage objectives in Goderich).
- Minimum affordability thresholds (e.g., 25–30% of units affordable) are often required to qualify.

Development Charge Relief

- Offered as either full waivers, grants, or 20-year deferrals.

- Tied to percentage of affordable units or specific housing forms (e.g., purpose-built rentals, supportive housing).
- Used strategically to avoid DC by-law exemptions, maintaining municipal control.

Municipal Fee Rebates

- Covers planning application, building permit, and sign permit fees.
- Some municipalities offer 100% rebates for projects with a high proportion of affordable units (e.g., Peterborough, Barrie, Blue Mountains).
- Fees may also be eligible for reimbursement through loan-equivalent programs prior to construction.

Targeted Support for Specific Housing Types

Additional Residential Units (ARUs)

- Grants or loans for retrofitting or adding secondary suites.
- Eligible works include OBC/Fire Code upgrades, accessibility improvements, and interior finishes.
- Common grant values: up to 50% of eligible costs, with maximums ranging from \$15,000 to \$30,000.

Conversion and Rehabilitation

- Downtown apartment conversion grants (Blue Mountains) and adaptive reuse incentives (Goderich, Welland) promote the activation of underused upper-storey or rear spaces.
- Grants typically cover up to 25% of eligible construction costs and 15% for professional services.

Land-Related Programs

- Surplus Land Grant Programs offer municipally owned land at low or no cost, subject to RFPs (e.g., Blue Mountains, Welland).
- Land-banking policies allow for future acquisition or leasing of land for affordable housing (e.g., Blue Mountains).
- Long-term leases and partnerships with non-profits are increasingly used to maintain affordability in perpetuity.

Specialized Grants and Loans

- Per-Door or Square Footage-Based Grants
- Examples include Barrie's \$10/sq. ft. per unit, capped at \$20,000 per affordable dwelling unit.

Forgivable Loans

- Welland offers forgivable loans up to 70% of eligible costs, capped at \$35,000 per property, with no repayment required if conditions are met.

Extended Benefit Grants

- Ongoing operating support (e.g., Welland's \$6,000/year for 5 years per unit) based on the difference between below-market rent and 80% AMR.

Study, Feasibility, and Design Grants

Several municipalities fund pre-development planning work, including:

- Feasibility studies, capital plans, and market analyses
- Coverage up to 50% of costs, often capped between \$7,500 and \$10,000
- Examples include Blue Mountains, Goderich, and Welland, with a requirement for professional documentation and municipal access to results.

Governance, Eligibility, and Approval Criteria

Many programs include:

- Minimum affordability duration requirements, often 20 years or longer
- Green design requirements, such as energy efficiency or low carbon construction
- Location-based eligibility (e.g., proximity to transit, inclusion in specific precincts or CIPAs)
- Requirement for pre-application consultations and alignment with urban design or official plan policies
- Municipal discretion is typically retained for approval, especially for land disposition and loan forgiveness.

6.4 Key Takeaways

Across Ontario, municipalities exhibit considerable diversity in how they structure CIP incentives to support affordable housing. Increasingly, programs are becoming more targeted, conditional, and performance-based, with an emphasis on flexibility, depth of affordability, and long-term outcomes. Core tools such as tax increment grants, development charge relief, and municipal fee waivers are commonly used and are often layered with supplementary supports like feasibility grants, land contributions, and forgivable loans. These incentives are most impactful when tied to clear affordability definitions, robust monitoring frameworks, and a strong understanding of local housing needs.

6.5.0 Compatible Programming for Climate-Resilient Housing

A number of federal and provincial programs support climate-resilient, low-carbon, and energy-efficient housing across Canada. These programs fund both retrofit and new construction initiatives, targeting various actors including municipalities, non-profits, Indigenous communities, and private homeowners.

6.5.1 Federation of Canadian Municipalities – Green Municipal Fund (GMF)

Sustainable Affordable Housing (SAH) Initiative

Supports the planning, design, and delivery of energy-efficient affordable housing.

Grants:

- Up to \$25,000 for planning
- Up to \$175,000 for feasibility studies
- Up to \$500,000 for pilot projects
- Capital Project Financing (Retrofit):
 - Up to \$10 million in loans, with 25–50% as grants based on energy performance.
- Capital Project Financing (New Builds):
 - Up to 20% of eligible costs, split equally between loan and grant.
- Eligible Applicants:
 - Municipal governments and corporations, non-profits, co-ops, and affordable housing providers.

Community Buildings Retrofit (CBR) Initiative

Focuses on reducing GHG emissions in community spaces through multiple streams:

- Grants for monitoring, recommissioning, and GHG feasibility studies
- Capital funding for GHG-reduction retrofits, including pathways toward net-zero outcomes.

6.5.2 CMHC – Canada Greener Affordable Housing (CGAH) Program

Focused on deep retrofits in multi-unit residential buildings (5+ units) to achieve:

- 70% reduction in energy consumption
- 80% reduction in GHG emissions
- Forgivable Loans:
 - Up to \$85,000 per unit (or 80% of retrofit cost), forgiven over 10 years.
- Low-Interest Loans:
 - Up to \$170,000 per unit, amortized over 40 years, with interest-only payments during retrofit.
- Eligibility:

- Includes community housing, Indigenous housing, shelters, supportive housing, and mixed-use affordable rental buildings.

6.5.3 Canada Infrastructure Bank – Building Retrofits Initiative (BRI)

Provides large-scale financing for deep energy retrofits via:

- Direct loans, or partnerships with mortgage lenders or special purpose vehicles (SPVs)
- Aimed at decarbonization and market transformation for commercial, institutional, and residential sectors.

6.5.4 Natural Resources Canada (NRCan)

Deep Retrofit Accelerator Initiative (DRAI)

- \$200 million (2023–2027) to fund “retrofit accelerator” organizations
- Supports project planning and market development for mid/high-rise multi-unit buildings.

Oil to Heat Pump Affordability Program

- Offers up to \$10,000 for homeowners switching from oil to cold climate air-source heat pumps.
- Covers equipment, electrical upgrades, tank removal, and back-up heat systems.
- Eligibility:
 - Median or below income households using oil in the past 12 months; must complete work within 6 months.

Canada Greener Homes Loan

- Interest-free loans of \$5,000–\$40,000 for home energy retrofits.
- Paired with an energy assessment; only applicable to homeowners using Greener Homes Grant or provincial equivalent.

6.5.5 Enbridge and Partnered Programs

Home Efficiency Rebate Plus (HER+)

- Jointly delivered by Enbridge and Canada’s Greener Homes Grant.
- Rebates of up to \$10,000 for insulation, windows, doors, and heat pumps.
- Additional \$600 for EnerGuide assessments.
- Excludes homes already maxed out on HER+ or CGHG programs.

Home Winterproofing Program (HWP)

- For low-income Enbridge customers
- Free insulation, draft-proofing, and smart thermostat

- Assessed and installed by authorized agents at no cost.

6.5.6 Independent Electricity System Operator (IESO) – Save on Energy Program

Energy Affordability Program

- Tailored to income-eligible Ontario electricity consumers.
- Comprehensive Support:
 - Includes in-home assessment, appliance upgrades, and draft-proofing.
- Energy Saving Kits:
 - Includes lighting, weather-stripping, faucet aerators, etc.
- Eligibility:
 - Based on income thresholds or receipt of certain government benefits; available to renters and homeowners.

6.5.7 Key Takeaways

Funding is available across the housing development cycle — from early-stage feasibility planning to deep retrofits and capital construction — and is typically delivered through a mix of grants, forgivable loans, and interest-free financing that can be layered for greater impact. Several major initiatives, such as CGAH, SAH, and HER+, emphasize greenhouse gas and energy reduction targets, making them particularly well-suited to municipalities and housing providers advancing climate-aligned CIPs. Increasingly, funding programs are tied to measurable outcomes, including reduced energy consumption or emissions, as well as social goals such as improved affordability for vulnerable or equity-deserving populations.

6.6 Example: Municipality of North Perth

https://www.northperth.ca/media/mz5akq2v/rpt_160623191_north_perth_attainable-housing_cip-updated-oct-2024.pdf

North Perth's updated Community Improvement Plan demonstrates a strong commitment to affordable and climate-aligned housing by offering a range of incentives that reward sustainability, infill development, and additional dwelling unit creation. The CIP emphasizes clear eligibility requirements and performance-based outcomes.

Planning and Building Permit Fee Grant

This program offsets a portion of municipal fees associated with eligible affordable housing projects.

- Covers up to 50% of eligible fees, to a maximum of \$5,000 per project.
- Applicants pay fees upfront and are reimbursed upon substantial project completion.
- Projects must meet 15 eligibility criteria (CIP pg. 25) to qualify.

Tax Increment Equivalency Grant (TIEG)

This grant provides long-term financial relief for eligible developments by rebating a portion of the increased municipal property taxes.

- Standard TIEG: 10-year schedule; starts at 100% of the municipal tax increment in year one, decreasing by 10% annually.
- Sustainable Building TIEG: Extended to 15 years for green building projects that meet design guidelines and sustainability definitions:
 - Years 1–5: 100% rebate of municipal tax increment;
 - Years 6–15: Rebate decreases by 10% per year.
- A Financial Assistance Agreement is required. Grants are disbursed following project completion and payment of full reassessed taxes. Grants are cancelled if the property is sold.

Additional Dwelling Unit (ADU) Grant

Supports the creation of legal accessory dwelling units within existing low-density housing.

- Covers 50% of eligible costs, up to \$10,000 per property.
- For projects meeting green building criteria and CIP design intent, the maximum increases to \$15,000.
- Grants are paid in a lump sum following construction and issuance of occupancy permit.

Commercial and Rental Housing Conversion and Expansion Grant (CRHCE)

Provides assistance for small-scale conversions of vacant or underutilized buildings into new rental housing, mixed-use, or eligible commercial uses.

- Encourages adaptive reuse and downtown intensification.

- Specific funding levels and criteria are guided by project scale and alignment with CIP priorities.

6.7 Example: City of Ottawa

<https://ottawa.ca/en/business/get-help-starting-or-growing-your-business/programs-and-projects/community-improvement-programs/affordable-housing-community-improvement-plan#section-944cdae0-0ea0-4afa-8ea0-e6a64815092a>

Ottawa has an affordable housing CIP with one tool available – a Tax Increment Equivalent Grant program. This program is meant to incentivize the development of affordable rental units in the City. TIEGs use the future property tax gains generated by a new development to help finance the development through grants. The grants help to offset the housing provider's revenue loss from affordable units.

The program provides fixed grants between \$6,000-\$8,000 per affordable unit per year for 20 years. To qualify, a minimum of 15% of the total no. of units in a development and a minimum of 15% of each individual unit type must be affordable. Affordable in this case means rental rates that are at or lower than the city-wide Average Market Rents. The total annual grant amount cannot exceed 50% of the incremental increase in property for the development.

The grant can be stacked with programs and funding from other levels of government or other CIP programs from the City (with a limit of 100% of the municipal property tax uplift).

6.8 Example: City of London

<https://london.ca/business-development/community-improvement-incentives>

The City of London has implemented a suite of incentive programs to promote affordable, rental, and adaptive housing forms, with a strong focus on compliance, tenant protection, and neighbourhood compatibility. These programs are built around common baseline requirements: units must not be used for short-term rental, RRUL licenses must be maintained annually, and compliance with zoning and licensing bylaws is mandatory. Incentives are subject to available funding and are structured to encourage long-term affordability and retention of housing stock.

Additional Residential Unit (ARU) Loan

This program provides financial support to homeowners creating new secondary suites in existing homes.

- Funding: Up to \$45,000 per unit, whichever is less (actual cost or cap).
- Loan Type: Standard, repayable over 9 years, beginning 1 year after completion.
- Eligibility & Conditions:
 - Primary dwelling must be owner-occupied.
 - Units must have a valid, annually renewed Residential Rental Unit Licence (RRUL).

- Short-term rentals are prohibited; leases must be minimum 31 days.
- Funds are disbursed after construction is complete.

Detached ARU Forgivable Loans

Three streams support the creation of detached secondary units with forgivable loans based on affordability or equity criteria, as described in the table below.

Stream	Max Amount	Rent Cap	Key Features
Detached ARU Loan	\$20,000	None	Forgivable after 10 years; lien on title
Affordable Detached ARU Loan	\$45,000	100% AMR (CMHC)	10-year affordability period, rent-capped, lien on title
Indigenous Detached ARU Loan	\$45,000	None	For Indigenous-led providers or homeowners; no owner-occupancy required

General Conditions:

- Only one ARU per property is eligible.
- Must maintain valid RRUL.
- No short-term rentals permitted.
- Forgiveness applies after 10 years, contingent on continuous compliance.
- 8% annual interest applies if terms are breached.

Office-to-Residential (OTR) Conversion Grant

This program supports the adaptive reuse of underused office buildings for housing in the downtown core.

- Funding: Up to \$35,000 per unit (forgivable loan).
- Eligible Buildings: Vacant Class B or C office buildings within the Downtown CIP area.
- Conditions:
 - Application must be submitted prior to building permit.
 - Owner must retain at least 10% equity in the property.
 - All funds must be disbursed by September 8, 2027.

Residential Development Charges (DC) Grant

Encourages new residential development in urban core areas through full DC reimbursement.

- Funding: 100% of DCs reimbursed as a grant over 10 years.
- Eligible Areas: Downtown and Old East Village CIPs.
- Conditions:
 - Application must be filed prior to or alongside building permit.

- Applicant must have no outstanding municipal debts.
- Must retain 10% property equity.
- Ineligible for projects opting into 21-year DC installment plans.

6.9 Case Study: Integrated Housing Investment and Innovation in Marathon, Ontario

The Town of Marathon, located along the north shore of Lake Superior, is emerging as a model for small-town housing innovation through the strategic alignment of federal, provincial, and municipal efforts. In response to a growing demand for housing—driven by resource-sector growth and evolving community demographics—Marathon has deployed an ambitious and multi-faceted strategy to accelerate the supply of affordable, sustainable, and diverse housing options.

Housing Accelerator Fund (HAF): Federal Support for Rapid Housing Expansion

In February 2024, the Government of Canada and the Town of Marathon announced a formal agreement under the Housing Accelerator Fund (HAF), securing nearly \$1.9 million to fast-track the delivery of at least 60 new homes over the next three years, with a longer-term target of 300 units over the next decade. Marathon was among the smallest municipalities in the country to secure HAF funding, underscoring the town's proactive leadership.

Marathon's HAF-supported Action Plan includes six local initiatives designed to:

- Enable a broader mix of housing types, including tiny homes, duplexes, townhouses, and multiplexes
- Release more municipally owned land for development
- Modernize permitting through software automation to reduce processing times
- Remove zoning barriers to medium-density and affordable housing
- Incentivize climate-resilient and low-carbon residential construction
- Integrate climate adaptation strategies into local planning frameworks

Together, these measures aim to streamline development, diversify the housing stock, and promote long-term sustainability. The first major initiative is a 20-unit tiny home subdivision, with homes estimated around 500–650 square feet and priced at approximately \$125,000. These units are expected to appeal to both first-time buyers and seniors looking to downsize. Site servicing for the subdivision is funded primarily through HAF, and the homes are expected to be delivered as early as fall 2025.

1 McLeod Drive: Provincial Investment in Indigenous Affordable Housing

In parallel, the Government of Ontario invested nearly \$1.7 million through the Social Services Relief Fund (SSRF) to support the construction of a 30-unit affordable apartment complex at 1 McLeod Drive in Marathon. The project, developed by Ontario Aboriginal Housing Services (OAHS) on land donated by the municipality, is a three-storey,

environmentally sustainable building that prioritizes access for Indigenous individuals facing homelessness or overcrowded living conditions.

This initiative reflects broader provincial efforts to address housing insecurity through targeted investments in Indigenous and supportive housing. OAHS's role in the project is supported by its allocation of over \$31 million in annual funding through Ontario's Indigenous Supportive Housing Program (ISHP).

Local Leadership and Multi-Level Collaboration

The Town of Marathon has demonstrated strong leadership by aligning local planning priorities with senior government funding opportunities. The municipality not only contributed land and servicing for both the McLeod Drive project and the planned tiny home subdivision but also embedded housing within its broader community development strategy.

The McLeod Drive site itself offers symbolic and practical value—located with a view of Lake Superior, the project provides high-quality, culturally responsive housing while achieving strong environmental performance. At the same time, Marathon is preparing for future growth with additional planning underway for Phase II of the Penn Lake Heights subdivision, which will introduce up to 105 lots with a mix of conventional and modular housing, varied lot sizes, and flexible price points.

A Model for Integrated Small-Town Housing Policy

Marathon's housing efforts represent a highly replicable example of rural housing transformation driven by:

- Integrated land use planning and infrastructure investment
- Creative use of federal and provincial funding tools (HAF, SSRF, ISHP)
- Strategic public land disposition
- Partnerships with Indigenous and non-profit housing providers
- Emphasis on affordability, sustainability, and process modernization

This case illustrates the potential for smaller municipalities to leverage available funding, local assets, and intergovernmental cooperation to deliver impactful and timely housing solutions that are responsive to community need and economic opportunity.

7.0 Consultation

7.1 Internal Staff Workshops

Internal workshops were conducted with municipal staff in Lucan Biddulph, North Middlesex, and Strathroy-Caradoc in May 2025. These sessions were designed to ground the CIP review process in local realities, drawing directly from the knowledge and experience of planning, building, and economic development staff. Each workshop followed a consistent format: participants were asked to reflect on current housing needs and market dynamics, identify barriers to housing development, evaluate the effectiveness of existing CIP tools, and suggest potential improvements or new program directions. Discussions were also framed around recent policy changes, infrastructure capacity, and the practicalities of implementing more affordable and climate-resilient housing forms. The insights gathered through these sessions have played a key role in shaping the tailored recommendations and program enhancements outlined throughout this report.

7.1.1 Lucan Biddulph – Internal Workshop Summary

Local Housing Needs & Market Conditions

Participants emphasized that while Lucan Biddulph offers a range of housing types, affordability remains a key concern. Apartment rentals are priced similarly to mortgage payments, and there is a growing gap in options for entry-level buyers and seniors not ready for long-term care. Senior apartments have been relatively successful, and their expansion was noted as a potential priority. Townhouses have emerged as a more attainable alternative, with unit prices dropping from \$700,000 to around \$499,000.

The community has seen a shift away from single-detached homes toward more apartment and townhouse development, driven by market forces. High-priced rentals—such as those at \$2,300/month—have proven difficult to fill, further underscoring the demand for more affordable options.

Barriers to Housing Development

Transportation was cited as a significant constraint, with limited transit coverage through Middlesex Connect making commuting difficult for lower-income earners. Sewer capacity in Lucan Biddulph is also near its limit, and no further subdivisions can proceed until the sewage treatment plant is expanded. Entry-level homes remain scarce due to high land prices driven by regional development pressure.

CIP Program Implementation & Feedback

This year (2025) marks the first time all CIP programs have been launched, and while it's too early to assess outcomes, early interest has been noted in the Additional Residential Unit (ARU) program. Staff acknowledged that current funding levels may be too modest to meaningfully influence housing affordability outcomes without additional tools/resources.

Opportunities & Strategic Actions

The redevelopment of some underutilized properties in Lucan Biddulph through partnerships was highlighted as a potential opportunity. Staff discussed reimagining certain sites in the core with affordable residential units and a ground-floor community

space. While challenges include organizational capacity and property restrictions, these types of projects are viewed as a key success indicator for the broader CIP update.

There is limited municipally owned land available for housing, though staff are open to exploring opportunities on private sites. Interest in climate-resilient construction remains low locally.

7.1.2 North Middlesex – Internal Workshop Summary

Local Housing Needs & Market Conditions

The discussion focused on the need for purpose-built rental, seniors housing, and more affordable homeownership opportunities. Staff noted a general lack of interest from developers, stemming from the perception that small-town projects offer limited financial return. Some residents also resist rental and higher-density housing, which further complicates delivery.

Existing opportunities include potential for upper-floor residential conversions in Parkhill and Ailsa Craig, and modest growth in ARU and mixed-use projects—especially where staff have been actively involved in supporting applicants.

Barriers to Housing Development

Infrastructure capacity in smaller hamlets, particularly around water and sewer servicing, was identified as a critical constraint. Current housing formats are also seen as poorly aligned with local demographics, especially for smaller households or aging residents. Staff emphasized the need for more flexible and context-sensitive development models.

CIP Program Implementation & Feedback

Overall, the CIP is considered clear and accessible; however, uptake across programs has remained modest. This is attributed to limited awareness and modest funding levels that do not align with actual development costs. Staff noted a need for more specific eligibility language, especially around ARUs and affordability definitions.

Suggestions included offering tiered grants based on affordability depth, introducing higher caps for larger projects, and pre-screening applicants to speed up processing.

Opportunities & Strategic Actions

There was some interest in introducing a pilot Tax Increment Grant (TIG), inspired by Strathroy-Caradoc’s model, to support multi-unit or affordable projects. Staff also expressed support for adding a “green bonus” to reward energy-efficient construction, and for updating CIP policies to better align with DC exemptions and income-based affordability definitions.

Few surplus municipal properties are available, but staff are open to working with Middlesex County on county-owned sites. Better marketing and pre-application guidance were suggested to build community awareness and participation.

7.1.3 Strathroy-Caradoc – Internal Workshop Summary

Local Housing Needs & Market Conditions

Strathroy-Caradoc has seen growing interest in stacked townhomes and ARUs, particularly in response to recent housing demand. Several applications have been received, suggesting momentum for mid-density forms. Staff noted that the core challenge remains balancing housing development with infrastructure capacity—especially in Mount Brydges—and overcoming constraints created by existing parking and zoning standards.

Barriers to Housing Development

Parking minimums were frequently cited as one of the biggest constraints to infill development. Zoning rules, especially for ARUs and small-scale intensification, also limit flexibility, though a comprehensive Zoning By-law update is in progress. Transit limitations were acknowledged but are viewed as a longer-term issue. Infrastructure is generally sufficient in Strathroy itself.

CIP Program Implementation & Feedback

Strathroy-Caradoc is unique in offering all CIP programs annually. Staff reported strong uptake in programs like ARUs and Urban Economic Development, with more limited interest in the Downtown Rental and Intensification programs due to boundary and brownfield restrictions.

Several applicants were ineligible due to starting construction before receiving formal CIP approval. Staff are exploring the potential to fund projects already underway to address this barrier. It was advised that this is not a standard practice for CIPs and may go against the spirit of the programming intent.

Opportunities & Strategic Actions

Staff proposed expanding CIP eligibility areas beyond downtown boundaries, possibly with a priority scoring system to protect core-area investment. Delegating approval authority to the CIP committee for lower-value applications was also suggested to reduce Council burden.

There is interest in updating program definitions—for example, clarifying that ARU grants cannot be used for primary dwellings—and enhancing application materials to prevent misinterpretation.

Funding & Public Land Considerations

The CIP reserve is healthy and rolls forward annually, but large industrial projects often consume most of the available funds. Two municipally owned parcels are being considered for affordable housing, and future development will include enforceable affordability terms, potentially secured through covenants or title restrictions.

7.2 Community Surveys

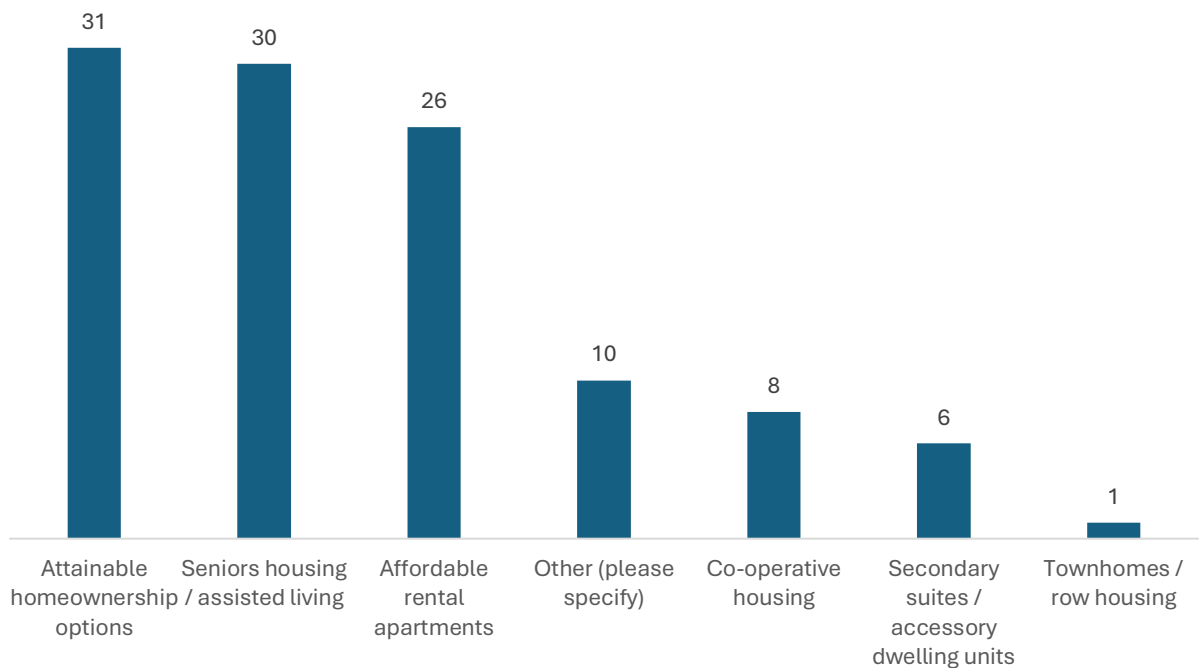
As part of each municipality’s effort to explore potential enhancements to its Community Improvement Plan (CIP), a public survey was conducted to gather feedback on housing needs, perceived barriers to development, program priorities, and climate-resilient housing initiatives. The survey was designed to inform local decision-making by ensuring that future CIP updates reflect both the lived experiences and preferences of residents, property owners, and interested parties. Participants were asked to identify priority housing types, assess the effectiveness and adequacy of existing CIP programs, and suggest new or improved incentives that could better support attainable and affordable housing. Input was also sought on sustainability-related improvements, including support for energy efficiency, green infrastructure, and resilient design. The following sections summarize the responses received in each community.

7.2.1 Lucan Biddulph Survey Results

A total of 52 responses were received for the Lucan Biddulph survey. The results are summarized below.

Housing Need in the Community

Respondents were asked to select the top three types of housing they feel is in greatest need in the community. The frequency of each housing type is summarized below. Several “other” responses were also provided, which are summarized after the table.

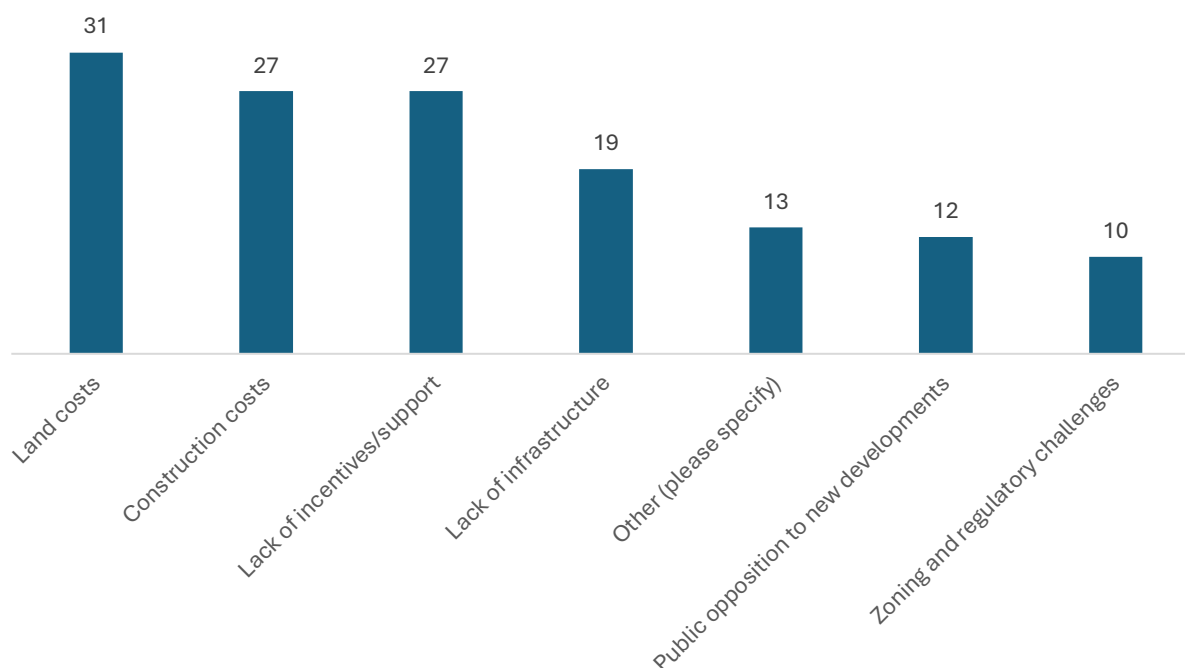


The results reflect a clear preference for: Attainable homeownership options (31 responses); Seniors housing / assisted living (30); and Affordable rental apartments (26). Other housing types, such as co-operative housing, secondary suites, and townhomes, received limited support. Notably, several “Other” comments called for geared-to-income

housing, more community living models, and homes with larger yards, alongside concerns about excessive traffic and existing vacant but unaffordable apartments. Some residents expressed fatigue with higher-density formats and questioned the desirability of additional apartment development in Lucan.

Barriers to Affordable Housing in the Community

Respondents were asked to identify the top three barriers facing the development of attainable/affordable housing in the community. The frequency of each barrier is summarized below. Several “other” responses were also provided, which are summarized after the table.



Respondents also highlighted key challenges facing affordable housing delivery in the “other” category:

- High rents and housing costs were widely cited, with many calling current pricing “ridiculous” and unaffordable to working residents.
- Distrust of developer motives was common, with frustration about profit-driven pricing and high costs for townhomes.
- Broader system-level concerns, including stagnant wages, limited government oversight, and a lack of meaningful affordability standards, were also expressed.
- Other barriers included infrastructure limitations, a lack of supportive local amenities, and skepticism toward municipal leadership and decision-making processes.
- Some respondents framed affordability as a national issue beyond the Township’s control, while others stressed the need to retain youth and seniors through income-sensitive housing options.

Thoughts on Existing CIP Programming

When asked whether current CIP programs support housing needs in Lucan Biddulph, opinions were divided:

- Several respondents saw the programs as a positive step but questioned their scale and impact.
- A consistent theme was the need for stronger oversight and affordability enforcement, with some expressing concern that benefits may not reach renters or low-income residents.
- Others were skeptical that existing programs are adequate for the local context, citing limited uptake, insufficient financial incentives, and a mismatch between programs and actual community needs.
- Suggestions included expanding support for tiny homes, senior-friendly units, and disability-accessible housing.

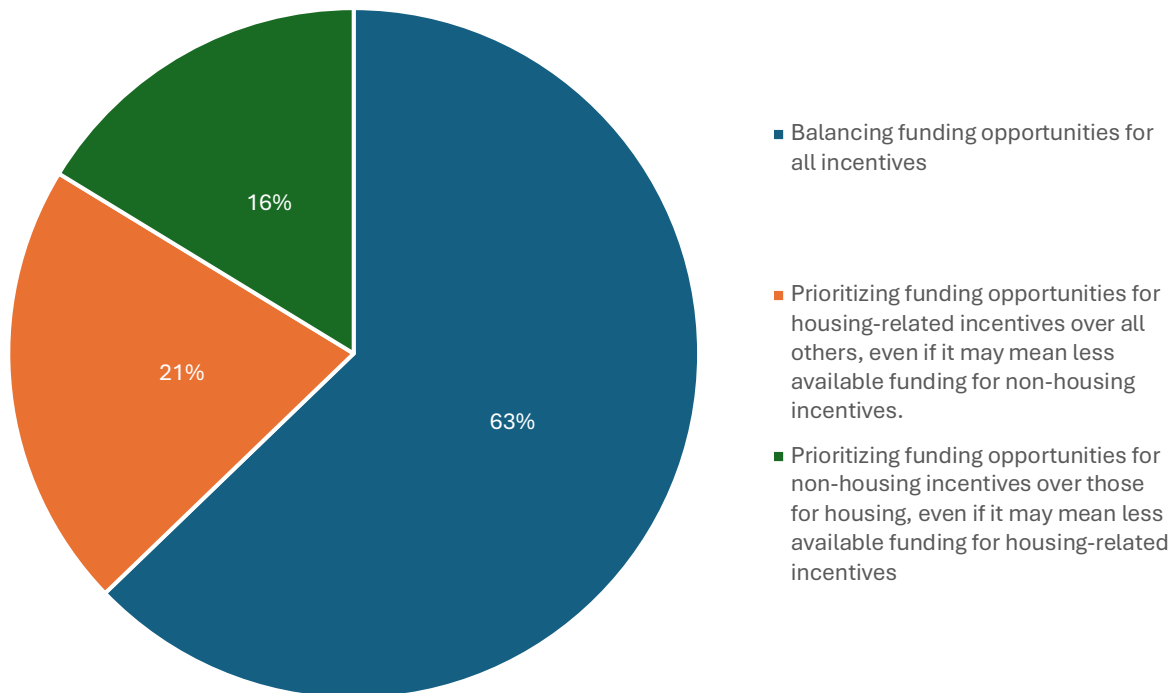
A minority of respondents rejected public support for private development altogether, while others called for better communications, clearer zoning/by-law information, and a stronger focus on housing for residents, not developers.

CIP Funding Amounts

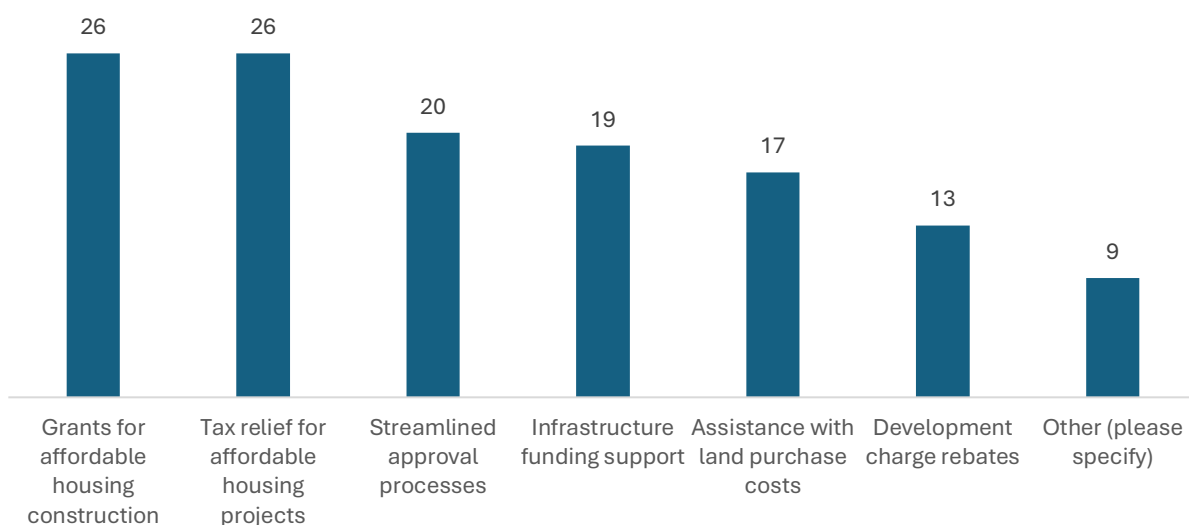
Respondents were asked whether they felt that existing housing incentives in the CIP were sufficient, and if not, what their ideas were for changes. Only 28% of respondents believed that current incentive funding levels are sufficient. The majority indicated that either: funding amounts are inadequate relative to actual costs; programs should target residents or homeowners rather than developers; and/or incentives alone are not enough—additional actions like lower development charges, better permitting processes, or even direct support for landlords were proposed. Some residents emphasized reallocating funding toward broader community services, such as childcare or infrastructure, over additional housing incentives.

CIP Funding Priority

Respondents were then asked their preference for three CIP funding scenarios to help gauge support for increased, decreased, or balanced housing incentive funding. As shown below, responses favoured a balanced approach.



What types of Incentives do you think would best support attainable housing development?

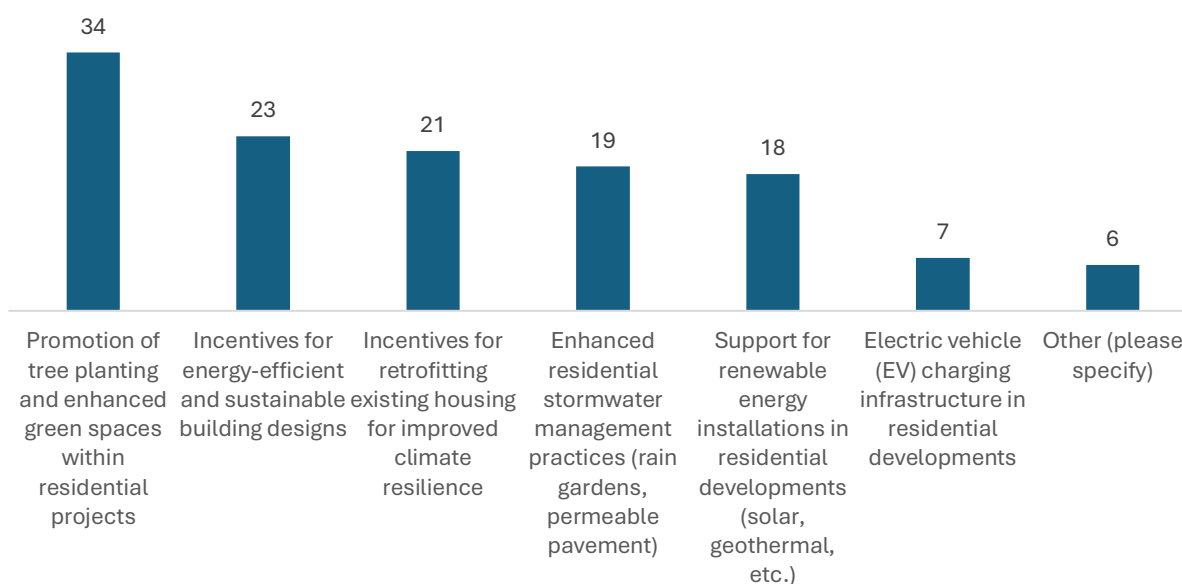


The most frequently selected incentive types were grants for affordable housing construction and tax relief for affordable housing projects, each selected by 26 respondents. These were followed by interest in streamlined approval processes and infrastructure support.

Several respondents provided written comments in the “other” category. Written responses reflected a broad mix of opinions on how incentives should be structured—and whether they should be provided at all. Several respondents called for more direct benefits to individual homeowners, such as refunds for adding living quarters to their property, or support for single-family dwellings, not just multi-unit developments. Others were more skeptical of incentives altogether, with comments like “no more development thanks” and “lower taxes, stay out of housing.”

A common concern was the need for stronger affordability enforcement, with one respondent suggesting that developers should only receive assistance if they agree to capped profit margins or provide rent-geared-to-income units. There was a clear desire for greater accountability and for funding to be tied to affordability guarantees. Overall, while some supported strategic use of incentives, others were hesitant to use public funds without stronger assurances of outcomes.

What climate-resilient housing initiatives would you most like to see supported through the CIP?



As shown above, options like energy-efficient retrofits, green building standards, and tree planting and landscaping received notable support. Several respondents also provided some written feedback, which included some mixed reactions to climate-resilient initiatives. Some respondents were supportive of low-cost, high-impact solutions like tree planting programs and rainwater collection, suggesting that small-scale improvements could help with stormwater management and neighbourhood aesthetics.

Others were more critical, voicing strong resistance to climate-related spending. Several respondents objected to the idea of public investment in EV infrastructure or green building upgrades, which they felt only added cost to already expensive projects. Affordability remained the top priority for many, with suggestions that climate initiatives be considered only when they do not increase housing costs.

Additional Thoughts

Respondents were asked to share any additional feedback, ideas, or suggestions that they want to be considered as part of the CIP review and update. Respondents provided a wide range of additional comments that reflected both frustration and constructive suggestions. Several emphasized the importance of housing affordability for younger generations and first-time buyers, urging the Township to ensure future development supports residents already rooted in the community.

Others advocated for community-oriented improvements, including trees in new subdivisions, better bylaw access, improved permit processes, and more amenities for families, like parks and recreational facilities. The design and location of new development also drew criticism, with one respondent describing some new higher density development as “out of character for our town”.

At the same time, some respondents expressed a strong preference for less municipal involvement in housing, suggesting that the private market should lead and that public funds be used for infrastructure or services instead. There were also calls for more clear and accessible information about planning policies, including garden suites and building allowances.

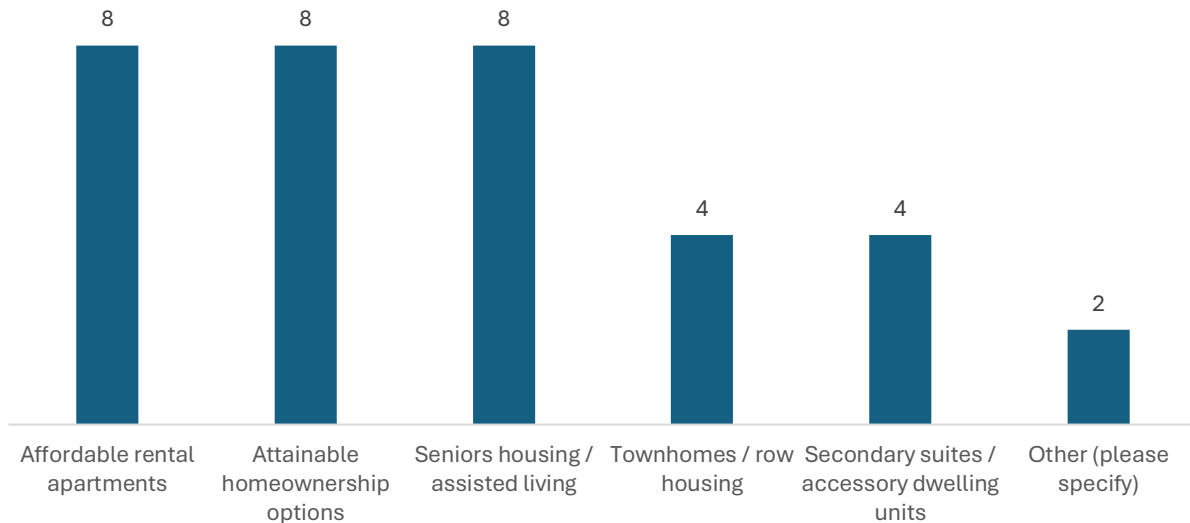
A recurring theme was the belief that CIP funding should go further—either by being better targeted or tied to long-term affordability and community benefit.

7.2.2 North Middlesex Survey Results

A total of 14 responses were received for the North Middlesex survey. The results are summarized below.

Housing Need in the Community

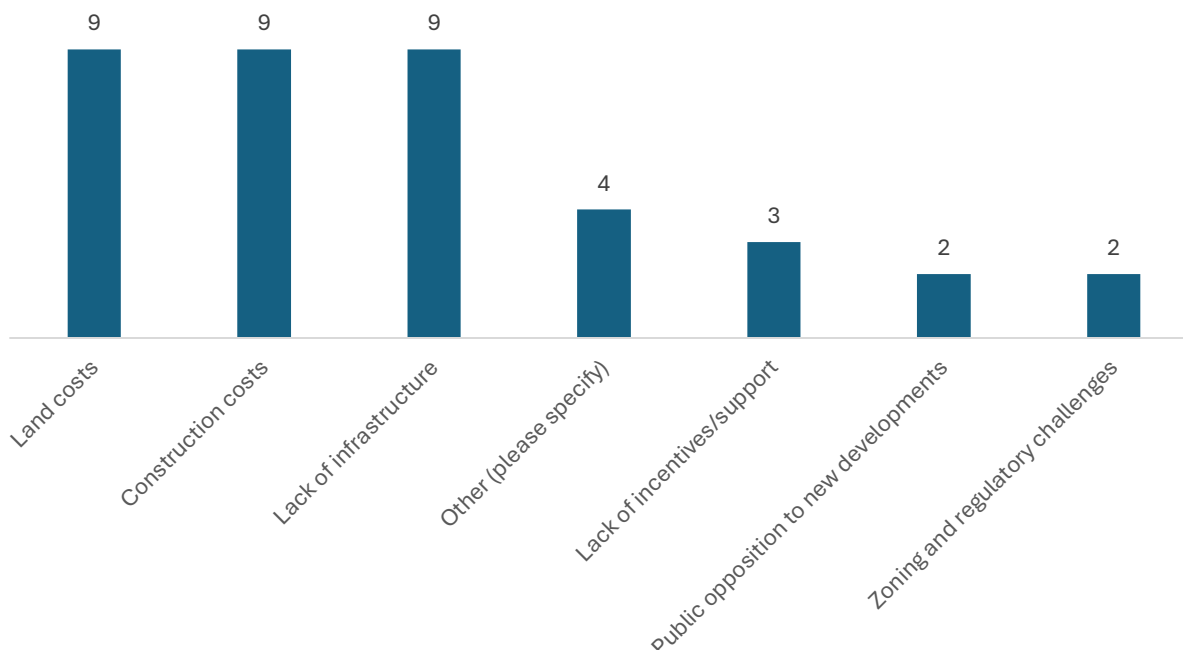
Respondents were asked to select the top three types of housing they feel is in greatest need in the community. The frequency of each housing type is summarized below. Several “other” responses were also provided, which are summarized after the table.



Respondents showed equal interest in affordable rental apartments, attainable homeownership options, and seniors housing/assisted living, with each receiving 8 mentions. Secondary suites and townhomes received modest support, while “Other” was selected by 2 respondents. There were two respondents who emphasized the need for larger lots and single family homes.

Barriers to Affordable Housing in the Community

Respondents were asked to identify the top three barriers facing the development of attainable/affordable housing in the community. The frequency of each barrier is summarized below. Several “other” responses were also provided, which are summarized after the table.



Barriers related to land and construction costs, as well as insufficient infrastructure were the most common hits amongst respondents. Several respondents provided further comments, raising concerns about a mix of local cost burdens (including property taxes and utilities), high down payments, and the distance to amenities, especially for low-income residents. One comment reflected a broader planning concern: that poorly managed development could erode the town's character and overburden local services. Another respondent noted the lack of housing oversight and called for better municipal planning, warning against short-sighted approvals.

Thoughts on Existing CIP Programming

Respondents were asked if they believed the existing housing-focused programs in the CIP effectively target projects that address the community's housing needs. Responses were mixed, reflecting both support and deep concern. Several respondents agreed that the programs—particularly those supporting conversions, secondary units, and affordable rental housing—were a good starting point. Others, however, questioned their practical impact, arguing that maximum funding levels are too low to meaningfully offset costs.

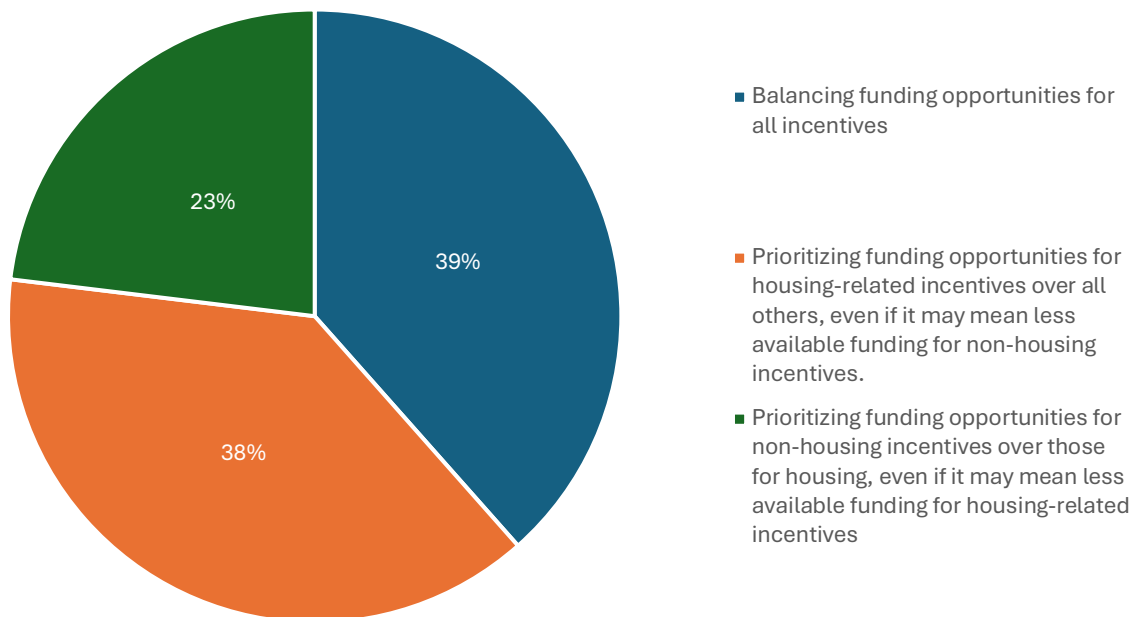
A recurring theme was the mismatch between incentives and real-world conditions, with some voicing concern that new housing may bring unintended consequences without corresponding investment in infrastructure, policing, or social supports. One respondent expressed frustration that essential upgrades (roads, waterlines, etc.) are being overlooked, which may undermine the viability of new development. Another emphasized that rising costs of construction outpace available grant amounts, making the programs uncompetitive.

CIP Funding Amounts

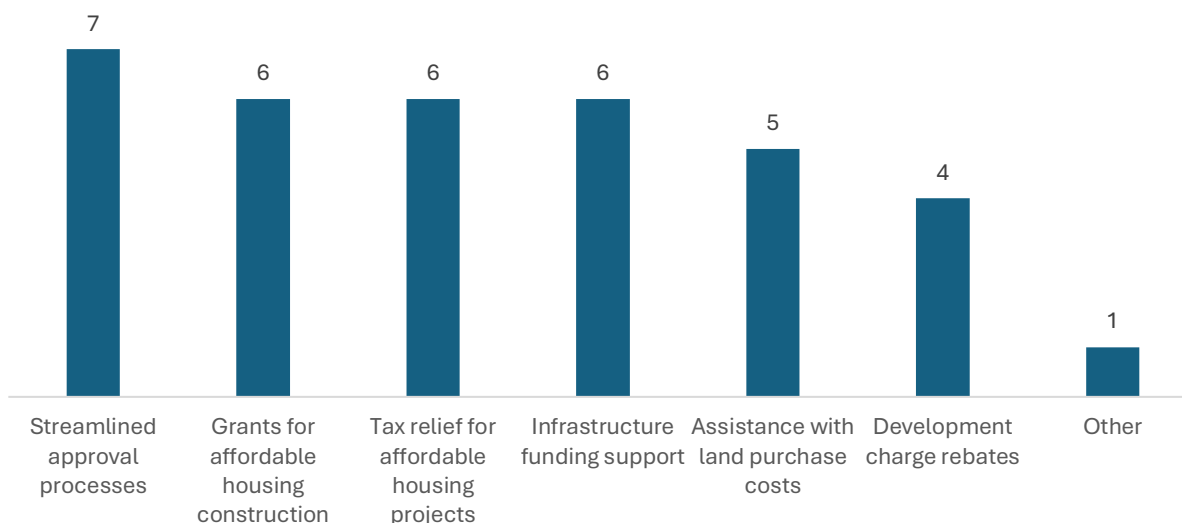
Respondents were asked whether they felt that existing housing incentives in the CIP were sufficient, and if not, what their ideas were for changes. Responses were split 50/50 as to whether people felt funding amounts were sufficient or not enough. Three of the respondents suggested a bump in the amount of money matched through the grants to 75%

CIP Funding Priority

Respondents were asked their preference for three CIP funding scenarios to help gauge support for increased, decreased, or balanced housing incentive funding.

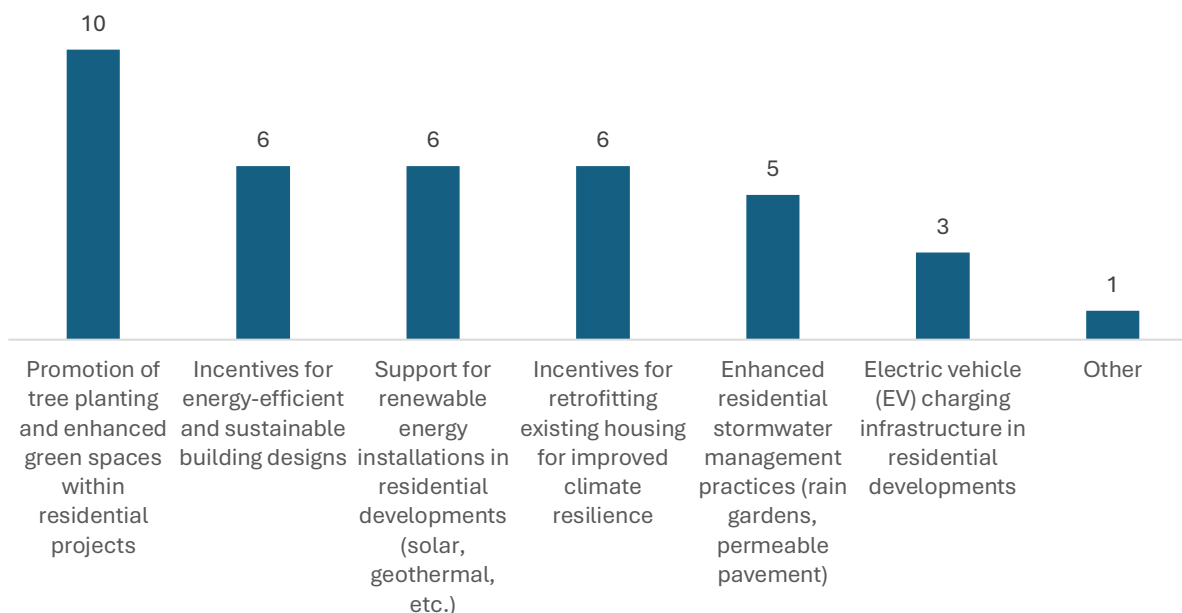


What types of Incentives do you think would best support attainable housing development?



Respondents most frequently selected grants, tax relief, and streamlined approval processes as the most helpful supports. The single “other” response suggested that the Municipality focus on infrastructure upgrades and maintenance (i.e. water lines).

What climate-resilient housing initiatives would you most like to see supported through the CIP?



Promotion of tree planting and enhanced green spaces within residential projects attained the most support, with a general mix of support for the remaining initiatives suggested. The single “other” response provided by someone suggested that the Municipality consider programs to allow for backyard chickens.

Additional Thoughts

Respondents were asked to share any additional feedback, ideas, or suggestions that they want to be considered as part of the CIP review and update. Respondents offered a cautionary tone in their closing remarks. Some encouraged the Municipality to prioritize infrastructure renewal for existing homes and businesses before focusing on new development. Others emphasized the importance of thoughtful planning and community fit, suggesting that North Middlesex should avoid the pitfalls seen in larger cities by fostering slow, deliberate, and locally grounded growth.

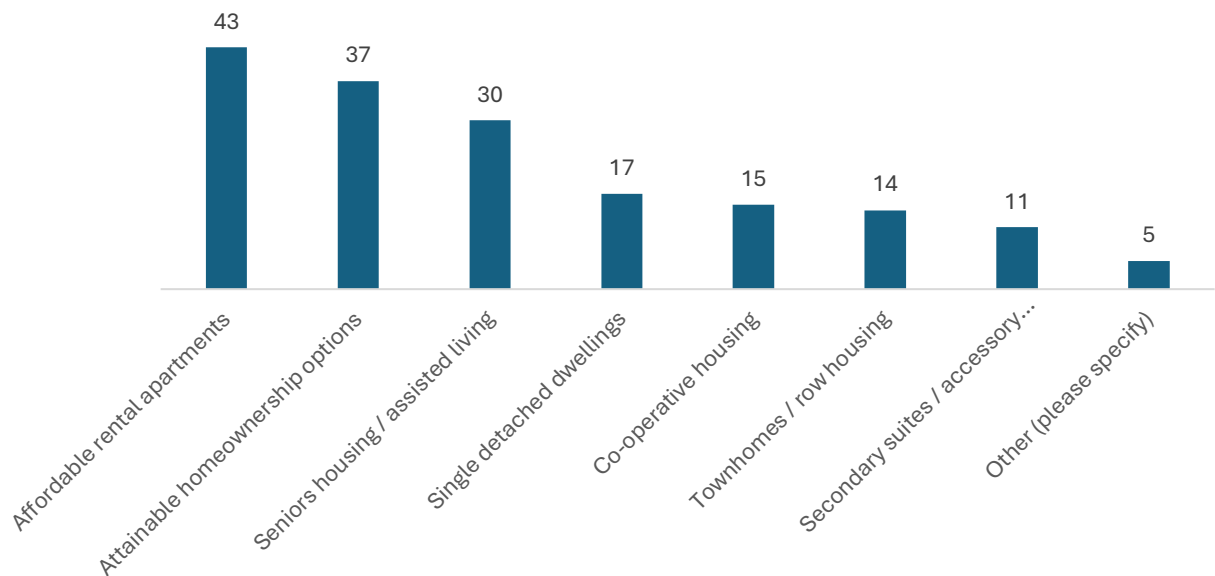
There was a strong preference for attracting small business owners and long-term residents, rather than developers or speculative landlords. The comments reflect a protective attitude toward the township's character, paired with a desire for smart growth that enhances, rather than disrupts, the existing fabric of the community.

7.2.3 Strathroy-Caradoc Survey Results

A total of 65 responses were received for the Strathroy-Caradoc survey. The results are summarized below.

Housing Need in the Community

Respondents were asked to select the top three types of housing they feel is in greatest need in the community. The frequency of each housing type is summarized below. Several “other” responses were also provided, which are summarized after the table.

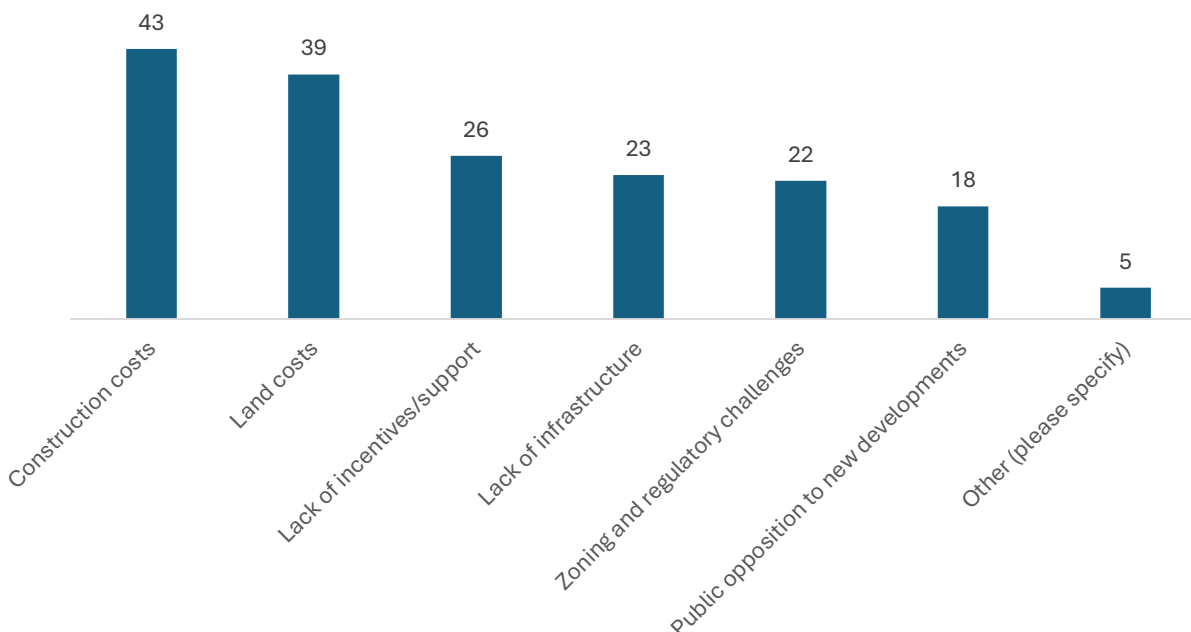


Affordable rental apartments, attainable homeownership options, and seniors housing were identified as the top three housing types needed in the community. These results suggest a strong desire for more accessible and diverse housing supply, particularly rental stock and housing for individuals on fixed incomes or entering the housing market.

Written feedback in the “other” category emphasized the need for high-density and mixed-use development formats, including apartment towers, multi-use buildings with commercial units on the ground floor, and intensification near downtown cores. Some respondents expressed frustration with current development models, especially where municipal involvement or partnerships were perceived to be ineffective or politicized. Others voiced strong support for preserving farmland and green spaces around the municipality, suggesting that development should not come at the expense of natural assets.

Barriers to Affordable Housing in the Community

Respondents were asked to identify the top three barriers facing the development of attainable/affordable housing in the community. The frequency of each barrier is summarized below. Several “other” responses were also provided, which are summarized after the table.



Construction and land costs were the two most identified barriers to affordable housing development, with other more moderately selected barriers being lack of incentives, infrastructure, and regulatory challenges.

Several written responses in the “other” category emphasized broader systemic concerns and local planning decisions. Comments highlighted dissatisfaction with the recent conversion of certain commercial lands to residential uses, which was perceived as a short-sighted loss of economic space. Some respondents argued that government incentives to developers may undermine market affordability and instead advocated for public-led housing construction. Additional barriers included inefficient development patterns, increased fees and development charges, and the perception that municipal leadership prioritizes developers’ interests over those of residents.

Thoughts on Existing CIP Programming

Respondents were asked if they believed the existing housing-focused programs in the CIP effectively target projects that address the community’s housing needs. Responses to this question were highly diverse. Several respondents expressed support for the programs, particularly grant-based incentives and planning for downtown intensification. Others suggested that the programs are a good starting point but lack the scale, accessibility, or oversight to ensure effectiveness. Infrastructure readiness and service delivery (e.g., lighting, safe crossings, water/wastewater systems) were noted as essential prerequisites for successful housing expansion.

Many respondents voiced scepticism about developer motivations, questioning whether funding ultimately benefits renters or low-income buyers. Some recommended refining eligibility criteria and enforcement mechanisms to ensure outcomes align with affordability goals. Others proposed improvements to CIP processes—such as year-round application windows, simplified permitting, and more flexible funding disbursement—to increase uptake among small-scale builders.

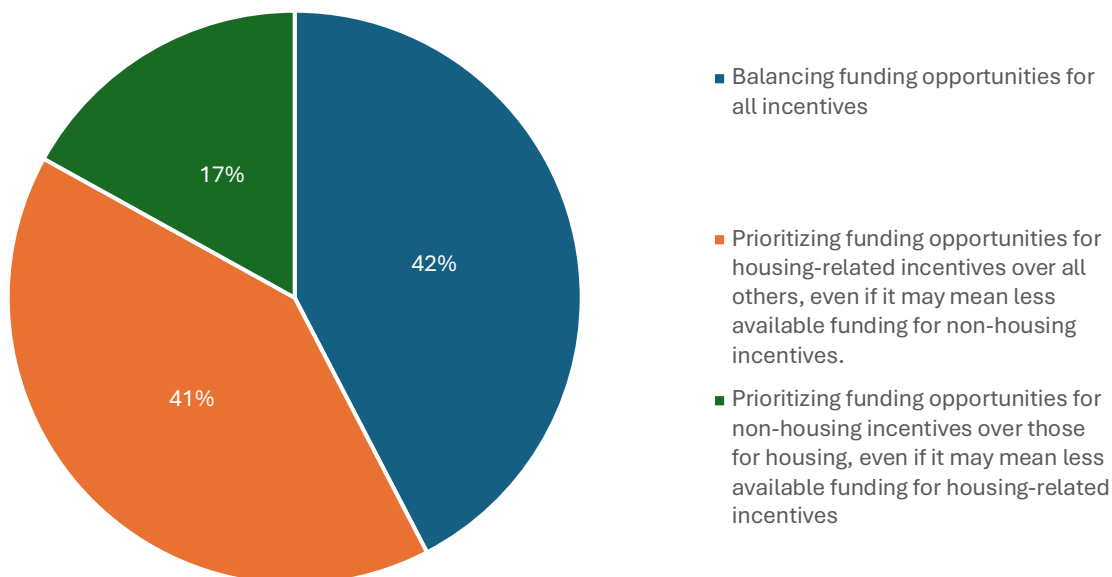
Critical comments noted the limited supply and high cost of rental housing in Strathroy-Caradoc, particularly in Mt. Brydges. Several respondents also argued that existing programs support larger developers at the expense of individual homeowners or community-led solutions.

CIP Funding Amounts

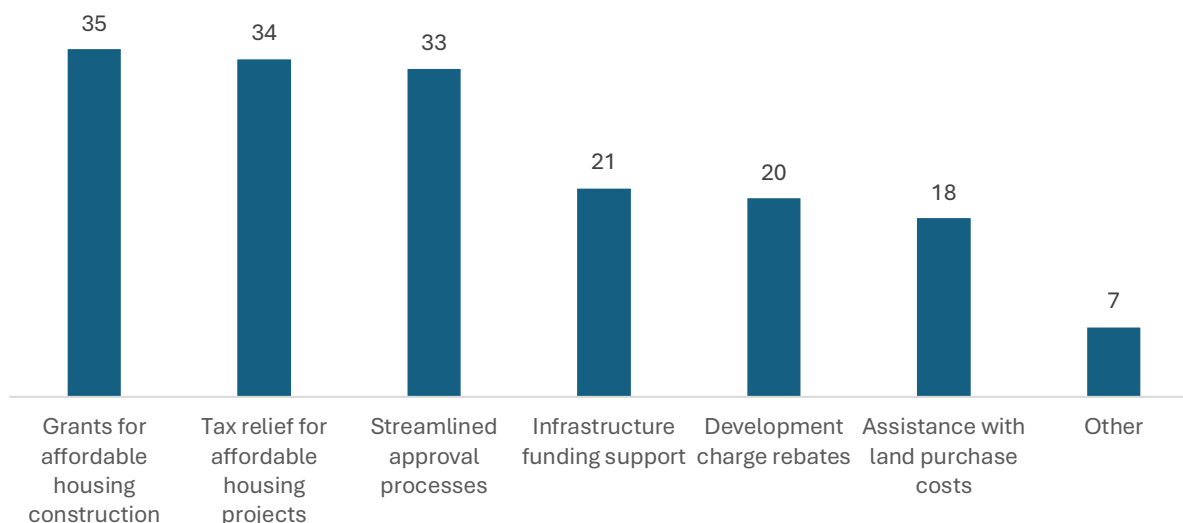
Respondents were asked whether they felt that existing housing incentives in the CIP were sufficient, and if not, what their ideas were for changes. Responses were generally split, with 54% indicating that funding amounts were enough, and 46% indicating that they were insufficient. Several respondents elaborated on their responses, with several expressing concerns about the rising cost of construction, labour, and materials outpacing grant maximums. Recommendations included doubling current incentive levels, introducing substantial tax reductions, and ensuring that funding for attainable housing and accessory dwelling units matches or exceeds redevelopment supports. Others noted that no amount of funding would be impactful without addressing underlying issues such as Strathroy's sewer capacity or the local wage-to-housing cost disparity.

CIP Funding Priority

Respondents were asked their preference for three CIP funding scenarios to help gauge support for increased, decreased, or balanced housing incentive funding.

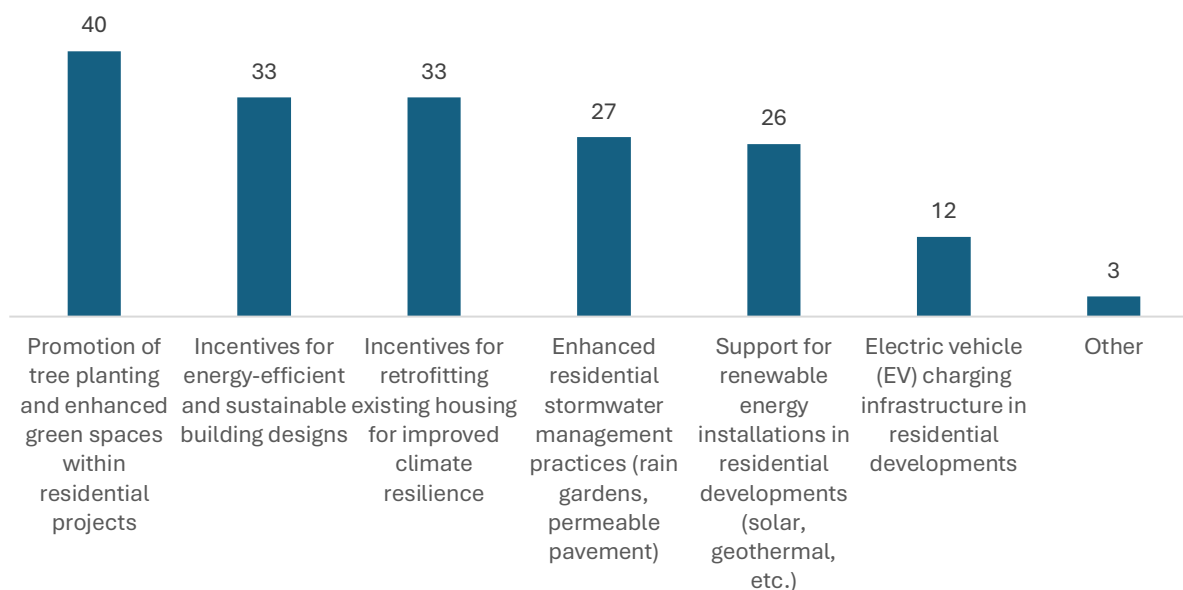


What types of Incentives do you think would best support attainable housing development?



As shown above, there was stronger support for initiatives involving construction cost and tax relief grants, as well as more streamlined approval processes for affordable housing projects. Additional comments in the “other” category reflected varying perspectives. Some respondents favoured limiting incentives to medium- and high-density development, while others advocated for funding to support multi-unit renovations or emphasized more clear communication about what programs are available. A subset of respondents believed that governments should directly build housing rather than offering incentives at all.

What climate-resilient housing initiatives would you most like to see supported through the CIP?



Based on the above, tree planting and energy efficiency retrofits were among the more prominent initiatives selected. Based on the written responses to the “other” category,

some respondents felt that upper-tier governments already provide sufficient support in this area, and called for the CIP to focus instead on core municipal responsibilities. A few emphasized the importance of protecting green space and surrounding agricultural lands. Others proposed simpler environmental measures, such as municipal composting programs or preserving natural buffers around new developments.

Additional Thoughts

Respondents were asked to share any additional feedback, ideas, or suggestions that they want to be considered as part of the CIP review and update. A broad range of feedback was received under this section, including both housing-specific suggestions and broader community planning concerns. Key themes included:

- A desire for more support for homeowners and small-scale projects, rather than developer-driven initiatives.
- Infrastructure concerns—especially in Mt. Brydges—were cited repeatedly, with calls to address sewer capacity, road quality, traffic safety, and pedestrian crossings before expanding housing.
- Some residents voiced discomfort with the increasing prominence of rental housing, associating it with reduced community quality.
- Others envisioned opportunities for Strathroy-Caradoc to position itself as a leader in sustainable, community-oriented design. This included support for affordable housing tied to walkability, green space, and modular construction, as well as accessible transportation (e.g., bike lanes, VIA Rail, public transit).
- Several respondents raised questions about program transparency, evaluation metrics, and the need for more participatory and localized consultation efforts.

8.0 Conclusions, Recommendations, & Next Steps

This joint background report provides a comprehensive foundation for updating the Community Improvement Plans (CIP) in Lucan Biddulph, North Middlesex, and Strathroy-Caradoc through the Housing Accelerator Fund (HAF) initiative. Through detailed policy analysis, market assessment, CIP program review, and targeted consultation, a series of clear themes and opportunities have emerged. These findings will directly inform the next phase of work, which focuses on the design, refinement, and implementation of enhanced housing-related incentive programs in each municipality.

8.1 Summary Conclusions

The research conducted for this report identifies several foundational considerations that have the potential to directly impact the development of housing-related community improvement programming.

While the Planning Act provides municipalities with wide discretion to establish and implement CIP, their historical use in Middlesex has largely centred on commercial revitalization, public realm improvements, and economic development. Housing-focused incentives, while they exist in all three subject CIP, have been a secondary focus of the CIP and focused on small-scale unit creation (i.e. creation of additional dwelling units or ADUs, or the renovation of existing residential units in main street commercial buildings). This focus on small-scale unit creation or improvement limits the ability of local municipalities to respond effectively, and at scale, to the current housing crisis.

The background report also identified a supportive policy framework for the implementation of incentive programming for housing, particularly for residential intensification, diverse housing types, and affordability. However, these policy directions have not yet translated into widespread or systematic use of community improvement planning to incentivize housing development. The absence of more housing focused programs presents a strategic opportunity, and a gap that should be addressed, if municipalities hope to make full use of HAF funding.

With respect to each individual CIP the following is noted from the background research:

- **Strong Program Foundations:** Each municipality has an existing CIP with solid structural elements and at least three housing-related incentives in place. The frameworks are well-aligned with the goals of HAF and the Middlesex Attainable Housing Review. Additionally, many of the programming offered is aligned with best practices observed in other jurisdictions.
- **Need for Targeting and Scale:** While the types of programs offered are appropriate, the scale of funding—especially per-unit grant amounts—limits their effectiveness in catalyzing meaningful housing outcomes. There is widespread recognition that existing incentives need to be re-calibrated to current construction costs and development realities.
- **Affordability Definitions and DC Exemptions:** All municipalities would benefit from updated, consistent definitions of affordability tied to Area Median Income (AMI) or CMHC market thresholds. Similarly, recent changes to the Development Charges

Act suggest a need to refocus DC relief only where it adds local value and is not redundant with provincial exemptions.

- **Growing Interest in Infill and ARUs:** Across all communities, there is increasing activity around additional residential units (ARUs), small-scale infill, and conversions—particularly as a path to gentle density. These housing forms are prime candidates for enhanced support and procedural facilitation.

While there is a strong policy and legislative framework to expand the scope of CIP tools to support housing, there is currently limited alignment across the subject municipalities in terms of eligibility criteria, priority areas, or program design. The background analysis suggests that there is potential value in establishing common guidelines, shared templates, or even a regional framework for CIP modernization that includes housing-supportive elements.

The jurisdictional scan conducted as part of the background report demonstrates a clear shift in practice among Ontario municipalities seeking to stimulate housing construction, particularly affordable, rental, and mixed-use typologies, using CIPs. Programs in municipalities like London, Kitchener, and Kingston provide tangible models for how grants, tax increment equivalent grants (TIEGs), and fee exemptions/reductions can be configured to advance housing goals. These examples also highlight how CIPs are often most effective when embedded within broader housing strategies or capital plans, rather than functioning as stand-alone programs.

Finally, the analysis notes that the effectiveness of CIPs in supporting housing depends not only on the range of eligible incentives but also on administrative capacity, political commitment, and partnerships with housing providers. In the Middlesex context, many local municipalities may require support to develop or update CIP policies, evaluate financial feasibility, and assist with implementation.

8.2 Recommendations

The analysis conducted in this report identifies a significant opportunity for the subject municipalities to leverage their CIPs more deliberately in support of housing affordability, supply, and diversity. The following recommendations are intended to guide municipal actions toward that goal, while also aligning with the eligibility criteria and intent of the federal Housing Accelerator Fund.

1. Broaden CIP Objectives to Explicitly Support Housing – The CIPs analysed are primarily focused on economic and community development (i.e. main street revitalization, rural economic development, etc.) with some limited programming directed to housing. To that end, the subject municipalities should consider expanding their CIP objectives to include more explicit support for:

- The creation of affordable housing and rental housing at scale;
- Development of residential intensification and infill housing; and,
- Mixed-use residential development in strategic growth areas.

Updating the stated objectives in existing CIPs, or adopting new, housing-specific CIPs, would create a policy foundation for offering a broader suite of incentives and aligning with HAF priorities.

2. Increase resourcing and funding of Housing-Supportive Incentives – Municipalities should assess their capacity to increase CIP funding for housing at scale. This evaluation should be rooted in a clear understanding of available financial resources, administrative capacity, and local housing needs. Municipalities should prioritize high-impact, scalable incentive types. Consideration should also be given to expanding or introducing Tax Increment Grants (TIGs) to support larger or more complex projects, particularly those that include long-term affordability, accessibility, or environmental performance commitments.

3. Develop a Consistent Framework for Housing-Supportive Incentives – While respecting local autonomy, there is value in establishing a common approach to housing-related CIP tools across the County. This framework could outline:

- Eligible housing types (e.g. purpose-built rental, affordable homeownership, missing middle forms)
- Eligible incentives (e.g. development charge rebates, tax increment equivalent grants, fee waivers, grants for accessibility or energy efficiency upgrades)
- Minimum affordability or tenure requirements
- Application, reporting, and accountability processes

Consistency can assist with streamlining administration, support inter-municipal collaboration, and assists private and nonprofit actors who may seek to develop similar projects in multiple municipal jurisdictions. Consistency can also assist in marketing incentive programming region-wide.

4. Integrate CIPs Within Broader Municipal Housing Strategies – To maximize impact, CIPs should not be treated as stand-alone tools but rather integrated into each municipality's broader housing policy framework. This includes ensuring alignment with:

- Official Plan policies and land use designations;
- Housing Needs Assessments, Action Plans, or Strategies;
- Infrastructure and servicing capacity; and,
- Capital budgeting and asset management planning.

Strategic integration can assist in ensuring that CIPs complement other efforts to expand the housing supply, rather than operating in isolation.

5. Build Local Capacity for CIP Implementation & Evaluation – Successfully expanding CIPs to support housing will require staff capacity for program administration, financial modelling, and interdepartmental coordination. Capacity-building is particularly important for municipalities that may lack, or have limited, in-house planning or financial expertise. To that end, the County and local municipalities should explore:

- Identifying joint training or resource needs and the pooling of resources where appropriate;
- Explore shared services or administrative support models; and / or,
- Consider enabling policies to allow for joint review committees for CIP evaluation or the design / implementation of programming.

8.3 Next Steps

To operationalize the recommendations and support the implementation of housing-supportive Community Improvement Plans (CIPs), the following next steps are proposed. These steps reflect a logical progression from research and policy review to the design, testing, and formal adoption of new or expanded CIP programming:

1. Develop Draft Incentives Based on Background Findings – Building on the analysis presented in this report, municipalities should prepare a set of draft CIP incentives targeted at advancing housing supply, affordability, and diversity. The design of these incentives should respond directly to the policy gaps and jurisdictional best practices identified in the background report, while remaining sensitive to each municipality's financial and administrative context.

2. Engage Stakeholders & the Public to Test Draft Programming – Before finalizing any program changes, undertake meaningful engagement with developers, nonprofit housing providers, community stakeholders, and the public to test the proposed incentives. This step is critical to assess feasibility, relevance, and potential uptake. It will also help identify refinements needed to ensure the programs are both implementable and impactful.

3. Prepare Statutory CIP Amendments – Following public consultation, municipalities should prepare formal amendments to their existing CIPs. These amendments must comply with the procedural and content requirements of Section 28 of the Planning Act, including designation or modification of Community Improvement Project Areas (CIPAs), updated program objectives, and detailed descriptions of the new or revised incentives. Where feasible, municipalities may coordinate this step regionally to ensure consistency in policy language, evaluation frameworks, and administrative procedures.

4. Adopt Updated CIPs Through Statutory Planning Processes – Once CIP amendments are finalized, municipalities must complete the statutory adoption process, including public notice, consultation, and Council approval. Aligning adoption timelines with Housing Accelerator Fund (HAF) commitments and reporting obligations will be critical to accessing federal resources.

