



Zoning By-law Amendment

Emergency/Transition Shelters and Incentivized
Temporary Accommodations Program
Mike & Sandy Kloepfer

Planning Justification Report

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Introduction

G. Douglas Vallee Limited has been retained by Mike and Sandy Kloefer to make an application to amend the Norfolk County Zoning By-law related to the former Canadian Agricultural Research Station, established in 1933. The intent of the zoning by-law amendment is to permit the former Research Station buildings to be used as emergency/transition shelters and an incentivized temporary accommodations program for people with special needs, including refugees, immigrants and low-income families. Concurrently, the proponent seeks to increase the employment base for Titan Trailers and other businesses in Courtland and Delhi.

Mike and Sandy Kloefer have a vision to help people in need. It began with providing emergency/transition shelters to Ukrainian refugees, immigrants and low-income families. This vision became known as Schafer House, which has since been helping people in need and was further advanced through an incentive program coordinated with Titan Trailers. Their vision has not only benefited the families that find temporary accommodations at Schafer House, but also provided employment, education, skilled trades and income through an employer to not less than 1 member of every family who stay at Schafer House.

Sandy Kloefer says,

"[This form of housing] is needed very much to help many folks that would otherwise be left with no options. It gives them the opportunity to get a leg up and be self-sufficient. So far we have had 100% success with all the families we have assisted.

The other thing that helping our Ukrainian families has done for Titan is to totally eliminate our largest impediment to growth. For decades we struggled with finding enough local people to fuel that growth. Even though some Ukrainian families have moved on to other jobs throughout Canada that were better suited to the education and experience they brought with them from the Ukraine, we have kept a great workforce of hardworking people that are advancing nicely in their careers at Titan."

Titan Trailers is a growing manufacturing industry, trying to increase its employment base. Due in part to the current temporary use of the former Agricultural Research Facility on Schafer Side Road and through the incentive program, Titan has been able to realize meaningful impact and increase the local employment base. Special needs housing is described in the Norfolk County Official Plan and discussed further in this report. Staff and Council previously supported Temporary Use Zoning By-law 6-Z-2022 which permitted the existing special needs housing. This application is proposed to amend the zoning by-law to permit the long-standing use of emergency/transition shelters to ensure the incentive program remains successful with the potential to continue to provide symbiotic relationships with employers in Courtland and Delhi such as Titan Trailers. The temporary use has been proven successful and now is seeking to make permanent the significant financial investment in renovating the facilities, ensuring the long-term success of the program, and viability of surrounding employment generators such as Titan Trailers.

Incentive Program:

The temporary incentivized accommodations program implemented by Mike and Sandy Kloefer is intended for people who need emergency/transitional shelter for generally one to two (1 to 2) years. The current program details include:

- 40% reduction in rent and utilities and property taxes are covered;
- Vehicles are made available temporarily until family makes enough money to afford their own;
- One (1) member of the family must work for Titan Trailers.

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The goal of the program is to provide emergency/transition shelters and an incentivized temporary accommodations program as a means of helping people become self-sustaining, with the assistance of an employer to teach a skilled trade and increase the employment base of employers in the area. The program was established in concert with Titan Trailers and has led to other opportunities for other local and nearby employers. Titan Trailers continues to participate in the program as its need for employees continues to grow.

- 1) Now that the program has been successful, the Kloepfer's, in 2025, will renovate most of the greenhouses to We intend to revamp most of the greenhouses this year to grow lettuces, tomatoes, peppers, and herbs year round for the residents.

Sandy Kloepfer says,

"We do want to prioritize families in need with these units and support for their integration into Canadian society. We have one dedicated staff person at Titan to help new arrivals with all the challenges they face for their first 6 months in Canada. Access to language classes, health care, transportation (getting license), banking, job orientation, enrolling kids in school, groceries shopping etc.

The members of our existing families at Schafer House also work for other local businesses as well as Titan such as the Courtland Bake Shop, Cranberry Creek, and many work seasonally for Fernlea Flowers.

All of the residents in Schafer House came on a 3 year work permit. All have applied for permanent residency; some have received permanent residency but the process is slow with the government. In order to buy a home (get a mortgage) or rent their own apartment, they need their permanent residency finalized."

The current temporary use for 'emergency/transition shelter' or 'special needs housing' has been successful and it is the intention of this application to take this proven system and symbiotic relationship between industry, residential affordability, and education to a permanent use for the long-term.

As families become self-sufficient, they invest in the economy and communities through housing, shopping, work, social interaction, and becoming contributing permanent citizens of Canada.

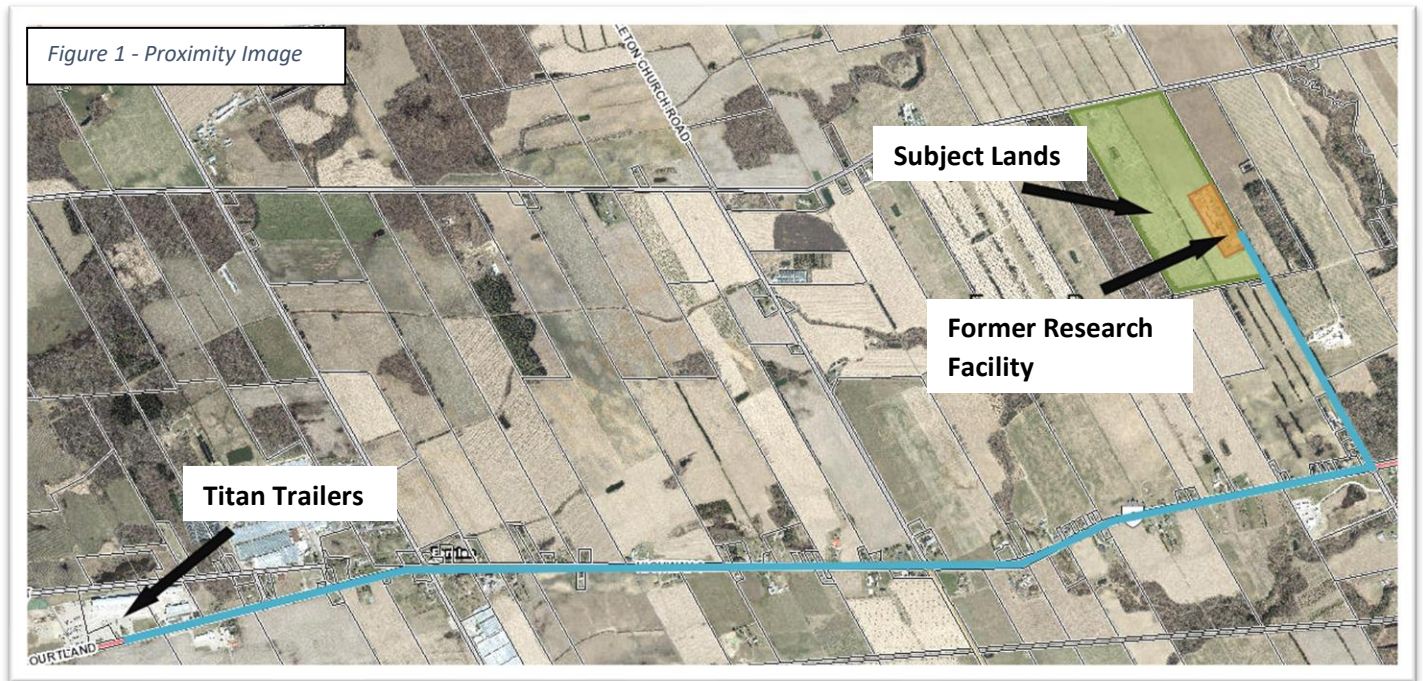
Addition to Incentive Program:

Recently, inspired by rising costs of produce and new tariffs, an additional investment into the existing greenhouses that form part of the area described in Map A, are being renovated to be able to operate on a year round basis. The purpose of these renovations is to grow produce including but not limited to tomatoes, cucumbers, lettuce, peppers, and herbs. Those families who reside in a shelter and wish to participate in the growing of produce and maintenance of the operation, will be given free produce year round. Extra produce will be donated to local food banks or to local fundraising initiatives.

Planning Observations

The lands fall within close proximity to Delhi and Courtland, where Titan Trailers is located (approximately seven (7) kilometres away). This is a growing industry which requires nearby accommodations to increase the local employment base. The subject lands are primarily Agricultural, with the exception of a small portion of land used for indoor storage and the former agricultural research station (see Figure 1).

There are no livestock operations in the area, few houses and few environmental features such as woodlots and watercourses. The woodland feature to the west is designated in the Official Plan as "Significant". The portion of the lands subject to the application are not in proximity to these features. There are no residential dwellings near the developed area of the property.



Studies

A Traffic Impact Brief prepared by F.R. Berry & Associates, dated November 30, 2021, supports the proposed amendment.

No additional studies are required, as the facility already exists. The proposed amendment does not change the existing land use; rather, it proposes to permit the use on a permanent basis.

Development Review Summary

- Implements Section 2 of the Planning Act.
- Is consistent with the intent of the Provincial Policy.
- Implements the Goals and Objectives of the Norfolk County Official Plan.
- Provides emergency/transition shelters and an incentivized temporary accommodations program to refugees, immigrants, and low-income families.
- Temporary incentivized accommodations program includes education, training, and employment with nearby employers such as Titan Trailers in Courtland.
- Traffic generation does not negatively impact the existing road network.
- Provides additional forms of housing encouraged by the Norfolk County Official Plan.
- Has no impact on surrounding land uses and complies with MDS.
- Previously supported by staff and Council.
- Represents good planning.

Description

The subject lands are approximately 40 hectares (100 acres) in area and are located on the southwest corner of 1st Concession Road N Trail and Schafer Side Road, Norfolk. The property is actively farmed and contains several buildings clustered together, encompassing approximately 4 hectares (10 acres).

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As shown in Figure 2, surrounding uses include:

- North – Agriculture
- South – Agriculture
- East – Agriculture
- West – Significant Woodlands/Agriculture

The lands are currently serviced with private septic and potable water cisterns. Fire protection exists on the property in the form of a dry hydrant and underground cistern.

The buildings on-site consist of the following:

- Former Agricultural Research Station (now temporary use for special needs housing/emergency/transition shelter')
- Several underutilized buildings originally intended to serve the Agricultural Research Station and agricultural use of the property:
 - Former Weather Station
 - Storage Sheds/Buildings
 - Maintenance shop
 - Greenhouses

Appendices to this report include the following:

- Appendix A – Site Plan Concept
- Appendix B – Planning Act Section 2 Compliance Review
- Appendix C – Provincial Planning Statement 2024 (PPS) Compliance Review
- Appendix D – Norfolk County Official Plan Policy Review

This application was submitted to include the information and material required under Section 34 (10.1) of the *Planning Act* as part of a complete application.



Current Temporary Use Zoning By-law 6-Z-2022

The current temporary use by-law permits emergency/transitional shelter. The provision states:

1. That for the purpose of this By-Law, emergency/transitional shelter shall be defined as follows:

"a special needs housing form that contains one or more habitable rooms which may include common kitchen, bathroom or other living and amenity space that meets the Ontario Building Code intended for temporary, short-term usage. The housing accommodations must be related to or supported by a non-profit or community group, government agency or special needs circumstances for purposes such as refugee or new immigrant accommodation, homelessness and other transient/transitional needs. It shall not be geared to long-term (one-year or greater) leasing or purchasing of the habitable space and shall not include market-based short-term rentals."

2. That in addition to the uses permitted in the Agricultural A-Zone (Subsection 12), a special needs housing form including a temporary emergency/transitional shelter may be permitted, subject to the following:
 - a) Within the buildings existing as of the date of this amending By-law and the associated parking and amenity area thereto contained within the location outlined on Map A;
 - b) Provided that any supporting services from federal and/or provincial agencies or municipal housing authority regarding the emergency / transitional shelter / special housing for immigrants and refugees are in place and any approvals that may be necessary are in effect.
 - c) The building and parking existing as of the date of this amending By-law shall be deemed to conform to the provisions of the Zoning By-law for the temporary use.
 - d) The maximum occupants shall be limited to the available and approved on-site servicing infrastructure and parking along with the Ontario Building Code and Ontario Fire Code or any other applicable legislation and regulations.
 - e) For a temporary period of time commencing as of the date of the passing of this amending By-Law up to a maximum of three (3) years.

Comments

Part 1 of the temporary use by-law

The existing definition of 'emergency/transition shelter' and its specific definition remains generally appropriate; however, it should be noted that the description stipulates that,

"It shall not be geared to long-term (one-year or greater) leasing or purchasing of the habitable space and shall not include market-based short-term rentals."

It is recommended that this portion of the definition be re-worded to,

"It shall not be geared to long-term (approximately three-years or greater) leasing or purchasing of the habitable space and shall not include market-based short-term rentals."

This modification ensures that long-term leasing beyond three years is not permitted yet allows for the temporary incentivized accommodations program to remain effective. Increasing the permitted rental period to three years will allow more sufficient time for occupants to develop their employment skills, increase their income and savings, and to find other forms of housing including permanent ownership. Allowing flexibility in the rental period

better caters to different family dynamics. For example, one person in the incentive program employment opportunity may have more family members than another family to take care of, thus reducing the amount of money the family can save towards becoming self-sufficient. In this case, the incentive remains the same, but the period of time it applies to is longer to ensure that the family has a good start becoming self-sufficient. On the other hand, if two people in a family are able to participate in the program, then they can increase their income and savings much more quickly.

Part 2 of the temporary use by-law

It is recommended that:

- Part 2 a) be modified to clarify and ensure that buildings can be modified, changed, replaced provided they remain in the confined area of the original Map A of the by-law.
- Part 2 b) be removed as supporting services from federal and/or provincial agencies or a municipal housing authority are not required to administer the Kloefer's temporary incentivized accommodations program.
- Part 2 c) continue to be in effect, or that if the County is of the opinion that a parking ratio be implemented, then 1 space for every 4 units would be sufficient. There is ample parking on site to accommodate parking and is justified further in this report.
- Part 2 e) be removed as this application proposes a permitted use, not a temporary use.
- That the lands referenced in Map A of the existing by-law continue to be referenced in the future zoning by-law amendment.

Under application ZNPL2022014, staff report CD 22-023 was presented to Council which recommendation was as follows:

“THAT the application by MIKE AND SANDY KLOEPFER, File Number ZNPL2022014, affecting the lands described as Part Lot 181, Concession 1 NTR, Geographic Township of Middleton, to amend the Norfolk County Zoning By-Law 1-Z-2014 to add a temporary use provision to the existing Agricultural “A” Zoning, BE APPROVED for reasons set out in Report CD 22-023 as attached as Appendix F;

AND THAT all public input received for this application was considered as part of the decision, as outlined in staff report CD 22-023.”

This report demonstrates the alignment of the professional opinion provided by staff with the Provincial Policy Statement and the County Official Plan. The report represents a thoughtful analysis of the proposed use and the County's sole discretion when evaluating the use as a special housing form.

Under the analysis of Planning Comments:

“Special Needs (now Additional Needs Housing PPS 2024) is defined as “any housing, including dedicated facilities, in whole or in part, that is used by people who have specific needs beyond economic needs, including but not limited to, needs such as mobility requirements or support functions required for daily living. Examples of special needs housing may include, but are not limited to long-term care homes, adaptable and accessible housing, and housing for persons with disabilities such as physical, sensory or mental health disabilities, and housing for older persons.”

“In the case of the proposed, the housing opportunity is specifically tailored towards populations in the vulnerable position of being new to Canada. The initiative related to the proposed is intended to provide housing and employment opportunities to those who choose to come to the site, while also linking the residents with community services such as those provided by the London Cross Cultural Learner Centre and Community Employment Services. It is the opinion of staff that the proposed use meets the definition of special needs as per the PPS.”

Furthermore, in respect to Section 2.3.6.1 b) of the PPS 2020 (Now Section 4.3.5.1 b) which is identical to the previous PPS) the Planning Comments go on to include:

“Norfolk County does not currently have any specialty crop area designated and the proposed complies with MDS formulae. The proposed temporary land use is meant to provide a temporary solution to a gap within the community. While the need is not directly identified within the 25-year time horizon, the immediate need for refugees housing has been identified on a national scale. It is the opinion of planning staff that, given the time sensitivity of the issue, and the potential of the existing development to serve this innovative purpose, that the proposed is consistent in intent with the PPS.”

Comment:

The urgent nature to help refugees, immigrants and low income families is an increasing and real world issue which is progressively getting worse. War continues to occur and now a tariff war between the United States and Canada is expected to exacerbate the issues that were considered important during the initial review for the temporary use. Special needs continue to be a reality to which the proposed application contributes to helping people and families, as well as benefiting employment needs as discussed further in this report. It is important to recognize that a permanent solution is necessary in the community, and not a temporary one. The substantial investment into the shelters and the incentive program will be required for decades to help people with special needs, to offset the increasing costs of living, to help people become self-sufficient to survive with their families without assistance, and to help train, educate and increase the employment base of Titan Trailers and other local industry and businesses. The proposed amendment to permit the emergency/transitional shelters remains consistent with the intent of the PPS.

Proposed Zoning By-law Amendment

To rezone the portion of lands currently zoned Agricultural (Temporary Use for Special Needs Housing) to Agriculture (Special Provision for emergency/transition shelters) and to add special provisions, including:

A-14.xxx: (on zoning Schedule “A4”)

- a) To permit “emergency/transition shelter” including the following:
 - i. Temporary incentivized accommodations for immigrants, refugees, and low-income families

Subject to the following special provisions:

- a) Parking ratio: 1 space for every 4 units

Site Specific Definition of ‘emergency/transition shelter’: *“a special needs housing form that contains one or more habitable rooms which may include common kitchen, bathroom or other living and amenity space that meets the Ontario Building Code intended for temporary, short-term usage. The housing accommodations must be related to or supported by a non-profit or community group, government agency or special needs circumstances for purposes such as immigrants, refugees, and low-income families accommodation,*

homelessness and other transient/transitional needs. It shall not be geared to long-term (approximately three-years or greater) leasing or purchasing of the habitable space and shall not include market-based short-term rentals."

Planning Review

The proposed Zoning By-law amendment was prepared considering several planning documents including the *Planning Act*, Provincial Policy Statement, Norfolk County Official Plan, and the Norfolk County Zoning By-law 1-ZA-2014.

Planning Act

Section 2	Lists matters of provincial interest to have regard to.
Section 3	Requires that, in exercising any authority that affects a planning matter, planning authorities "shall be consistent with the policy statements" issued under the Act and "shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be".
Section 34	Allows amendments to the Zoning By-law.

Provincial Interest

Section 2 of the *Planning Act* establishes matters of provincial interest. The Minister, the council of a municipality, a local board, a planning board, and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest. These matters are reviewed in Appendix B.

It is noted that these provincial interests are from the highest level of policy being the *Planning Act*; however, the intent of the owner's application meets these interests as demonstrated in this report.

Section 3 of the *Planning Act* requires that, in exercising any authority that affects a planning matter, planning authorities "shall be consistent with the policy statements" issued under the Act and "shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be". Section 34 of the *Planning Act* allows for the consideration of amendments to the Zoning By-law.

Provincial Planning Statement (2024)

The Provincial Planning Statement 2024 (PPS 2024) establishes the overarching policy framework for land use planning and development in Ontario. Issued under the Planning Act, its primary purpose is to guide decision-making on matters of provincial interest, ensuring that growth is managed sustainably while balancing environmental, economic, and social objectives. It provides municipalities with the tools to plan for complete, transit-supportive, and resilient communities, emphasizing the delivery of a diverse range of housing options to address the province's goal of 1.5 million new homes by 2031. The PPS 2024 also supports economic competitiveness, the protection of natural heritage, water, and agricultural resources, and the mitigation of risks to public health and safety through responsible land use planning.

The PPS 2024 reinforces the importance of collaboration across all levels of government, Indigenous communities, and stakeholders to ensure coordinated planning. It prioritizes climate resilience, the optimization of infrastructure investments, and the safeguarding of employment areas to drive economic growth. Municipalities are tasked with implementing the PPS 2024 through their official plans, zoning by-laws, and related planning instruments, aligning local decisions with provincial priorities while considering unique local contexts.

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By integrating long-term sustainability with provincial and municipal goals, the PPS lays a foundation for orderly, efficient, and equitable growth across Ontario.

The subject land is identified as being within a Prime Agricultural Area, according to the PPS 2024. Details describing the applicable provincial policies and how the application is consistent with the PPS 2024 are included in Appendix C.

The PPS states,

“The Provincial Planning Statement recognizes the diversity of Ontario and that local context is important. Policies are outcome-oriented, and some policies provide flexibility in their implementation provided that provincial interests are upheld.

While the Provincial Planning Statement is to be read as a whole, not all policies will be applicable to every site, feature or area. The Provincial Policy Statement applies at a range of geographic scales.

Some of the policies refer to specific areas or features and can only be applied where these features or areas exist. Other policies refer to planning objectives that need to be considered in the context of the municipality or planning area as a whole and are not necessarily applicable to a specific site or development proposal.”

The PPS recognizes that local context is important and that policy is outcome-oriented. Not all policies are applicable to every site in all situations. As demonstrated in Appendix C, the proposed application implements Provincial interests through several key policy objectives. It cannot consider unique opportunities that may not ‘fit’ exactly with the specific wording of each individual policy yet maintain the overall intent and objectives of the PPS 2024 as a whole.

Employers require people to grow their businesses. Courtland Bake Shop, Fernlea Flowers, Cranberry Creek in Lynedoch are examples of how the program has created symbiotic relationships. Scott Canada is located in Delhi. Titan Trailers is located in Courtland, and is an economic driver and major employer in Norfolk County. Recent decisions of Council are growing the industrial land base to attract a mix of industry, including large manufacturing businesses. One challenge with investing in a new location is to secure an employment base. For Titan Trailers, the existing operation and future growth of this industry is reliant on increasing its employment base. The creation of the temporary incentivized accommodations program, proximate to the industry, is a key component of ensuring the success of the industry. While the proposed zoning by-law amendment to permit emergency/transition shelter as a permitted use is very unique, it implements the overall intent of the Provincial Planning Statement as demonstrated in this report.

The temporary incentivized accommodations program exemplifies PPS 2024’s priorities for balancing community infrastructure, employment, and sustainability. By repurposing an underutilized former research facility, the program provides short-term accommodations and support services, aligning with Policy 2.2.1(a) by addressing the needs of individuals requiring temporary shelter and stability. The proximity to Titan Trailers ensures direct access to employment opportunities, reinforcing Policy 2.8.1 by strengthening the local workforce and contributing to the rural economy. Notably, Titan Trailers is a major manufacturer of transport vehicles used for agricultural hauling, directly supporting local farm operations and agribusinesses. This further aligns with Policy 4.3.5.1, which allows for limited non-agricultural uses in prime agricultural areas when they support the broader agricultural economy.

The proposed zoning by-law amendment aligns closely with PPS 2024 by addressing key objectives related to community infrastructure, economic resilience, and sustainable land use. Policy 2.2.1 emphasizes the

importance of accommodating diverse community needs, and the incentivized accommodations program achieves this by providing temporary, transitional accommodations for individuals seeking workforce integration and financial stability. These short-term accommodations are directly connected to local employment opportunities at Titan Trailers, reinforcing economic sustainability and social well-being. By repurposing an underutilized research facility into a hub for transitional accommodations and workforce participation, the proposal contributes to the broader goal of complete communities as outlined in Policy 2.1.6, enhancing accessibility, economic opportunity, and community resilience across the region.

The reuse of existing infrastructure and the strategic location of the program near employment areas further align the proposal with PPS 2024's emphasis on sustainability and efficient resource utilization. Policies under Chapter 4, such as 4.3.5.1, emphasize the preservation of prime agricultural land by restricting non-agricultural uses to those that do not hinder surrounding agricultural operations. The proposed use meets these criteria, as the adaptive reuse of the former research station does not encroach on the productive agricultural land base and, in part, supports the agricultural economy by addressing labour shortages in nearby industries. To understand this relationship, it is important to note that Titan Trailers plays a critical role in the agricultural sector by manufacturing transport vehicles essential for hauling products such as grain, corn, and other farm commodities. By supporting a workforce for industries and commercial businesses that serve the agricultural sector, this initiative strengthens both the local economy and farming operations. The amendment, therefore, not only adheres to PPS 2024 policies on land preservation but also reinforces the agricultural economy's long-term viability.

The policies of Section 6 collectively support the justification for a context-specific solution, such as the adaptive reuse of an existing structure for an emergency/transition shelter. The Minister's discretion (6.1.4), the requirement for PPS-aligned decision-making even when municipal plans are outdated (6.1.5 & 6.1.6), and the ability to adjust policies over time (6.1.12 & 6.1.13) provide a strong foundation for flexibility in implementation, allowing municipalities to approve site-specific solutions that address special accommodation and employment needs while remaining consistent with provincial planning objectives. As outlined in PPS 2024 Section 6.1, municipalities must make planning decisions that align with provincial interests, even if Official Plans or zoning by-laws have not yet been updated. The proposed amendment meets this requirement by implementing an outcome-based, site-specific approach that balances economic, social, and agricultural objectives while maintaining land use compatibility.

With consideration given to these unique circumstances and in light of achieving the intent of PPS 2024, a decision by Council to approve the Zoning By-law amendment will be consistent with provincial planning priorities. as the adaptive reuse of an existing structure for an emergency/transition shelter. The Minister's discretion (6.1.4), the requirement for PPS-aligned decision-making even when municipal plans are outdated (6.1.5 & 6.1.6), and the ability to adjust policies over time (6.1.12 & 6.1.13) provide a strong foundation for flexibility in implementation, allowing municipalities to approve site-specific solutions that address special accommodations, and employment needs while remaining consistent with provincial planning objectives.

With consideration given to these unique circumstances and in light of achieving the intent of the policies, a decision by Council to approve the Zoning By-law amendment will be consistent with PPS 2024.

Norfolk County Official Plan

The lands are designated Agricultural in accordance with the Norfolk County Official Plan. The proposed amendment meets all applicable Goals and Objectives in the Official Plan, including Strong and Diversified Economy; Protecting and Enhancing the Natural Environment; Maintaining and Enhancing the Rural and Small Town Character; Maintaining a High Quality of Life; and A Well Governed, Well Planned and Sustainable County.

In particular, the proposed amendment contributes to a Strong and Diversified Economy by permitting the existing emergency/transition shelters as short-term, structured accommodations, supported by the incentivized temporary accommodations program to educate, train, and employ people with special needs, with nearby employers such as Titan Trailers through the redevelopment of existing underutilized buildings. The property is proximate to industrial employment in Delhi and Courtland, and not only does it maintain and grow a major economic driver in Norfolk County, it also generates an income to sustain refugees, immigrants, and low-income families, creating a mutually beneficial business model. The incentive program ensures that individuals have temporary accommodations while they transition into stable employment and self-sufficiency.

The County promotes a planning framework that is flexible and adaptable to the economic environment and encourages investment and a broad range of employment opportunities. They promote new businesses and economic activities that are not currently available in the County to maximize employment opportunities through land use policies. The Council recently supported an increase in industrial lands in Courtland of approximately 93 hectares to create an industrial park. This demonstrates Council is fulfilling its Official Plan Goals and Objectives; however, the implementation of such a plan cannot simply occur by expanding the industrial lands available for development. The success of the initiative will require long-term planning, coordination of major utilities such as Hydro, and partnerships between landowners and Norfolk County. The creation of temporary incentivized accommodations program related to nearby employment opportunities will increase the potential for a successful industrial park and growing employment base. By leveraging underutilized buildings, this initiative fills a critical gap in workforce accommodations without affecting the County's agricultural land base.

The proposed amendment aligns with the County's economic and planning policies by ensuring that the existing agricultural character of the site remains protected. No farmland is being removed from production, and the adaptive reuse of the former Research Station maintains the integrity of the agricultural designation. The NCOP supports innovative approaches to economic development, and this proposal offers a site-specific use that facilitates a temporary accommodations model linked directly to education, training and workforce participation.

Furthermore, the adaptive reuse of existing buildings ensures that the development does not create land use conflicts, require additional municipal services, or compromise agricultural operations. The site remains self-contained, with no anticipated impacts on adjacent agricultural lands or infrastructure. The proposal is consistent with Policy 4.4 (Promoting Agriculture), as it does not remove land from production, and with Policy 5.3 (Ensuring a High Quality of Life) by providing a structured, short-term, temporary accommodation program that supports economic participation. The detailed analysis of the Norfolk Official Plan contained in Appendix D demonstrates that the use conforms to the policies of the Official Plan and is in keeping with the goals and objectives of the County.

In this instance, a decision by Council to approve the Zoning By-law amendment will be consistent with Norfolk County Official Plan.



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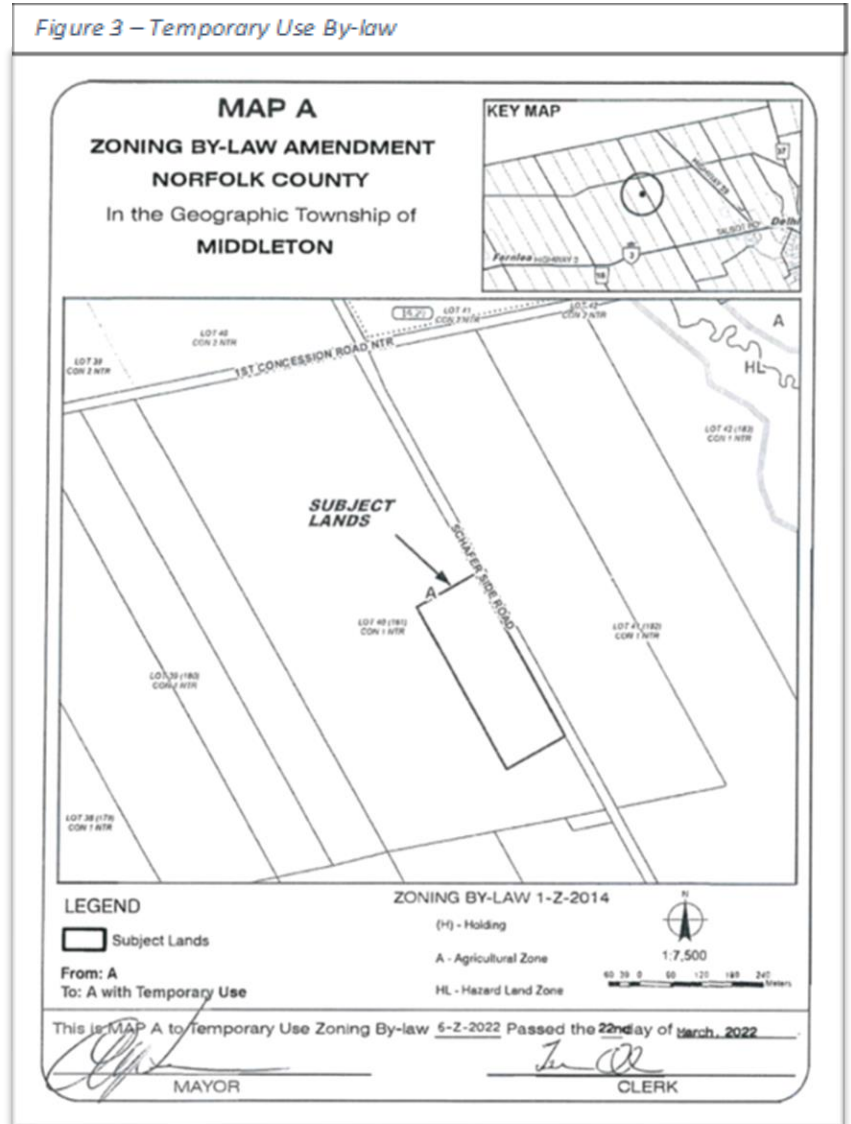
Norfolk County Zoning By-law

The lands are currently zoned Agricultural (A) with permissions through a temporary use by-law to allow for emergency/transitional shelters within the former Agricultural Research Station buildings. It is proposed to only re-zone the developed area of land property to permanently permit emergency/transitional shelters as a permitted use. The entirety of the cultivated portion of the property will remain in the Agricultural zone and will continue to be used for farming purposes. See Figure 3 which describes the existing area subject to the temporary use by-law. The current temporary use was established through By-law 6-Z-2022, permits emergency/transitional shelters to allow for temporary residential accommodation within the existing buildings for a period of up to one year or greater and to recognize parking as is.

The application proposes to reduce the parking requirements of the zoning by-law, as the temporary incentivized accommodations program provides carpool and bussing transportation to families in the program. The goal of the program is to help families achieve financial independence, earning the ability to rent or own a home and vehicle to support their own family. There is sufficient land to accommodate more parking if the need becomes necessary. However, the incentive program results in the minimal need for parking.

Furthermore, based on the success of the incentive program, world political uncertainty, the increase in costs of living and many other debilitating factors faced by our society today, the proposed modification of the definition to limit short-term accommodations to up to 3 years, ensures that the intent of the incentive program remains inclusive and attempts to avoid unintentional exclusion, inflexibility, or limit access for individuals or families who align with Norfolk County policy objectives and the applicants' commitment to supporting those in need.

Figure 3 – Temporary Use By-law



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The existing agricultural zone provisions include:

Provision	Required	Proposed
Minimum Lot Area	40 Ha	40 Ha (existing)
Residential Lot Surplus	2,000 sqm	N/A
Minimum Interior/Corner Lots	30 m	No change
Minimum Front Yard	13 m	No change
Minimum Exterior Side Yard	13 m	No change
Minimum Interior Side Yard	3 m	No change
Minimum Rear Yard	9 m	No change
Minimum Separation	30 m	No change
Maximum Building Height	11 m	No change
Parking: Apartment	1.5 parking spaces for each dwelling unit	1 parking space for every 4 dwelling units

MDS

It does not appear that there is a livestock facility within 2 kilometres of the subject lands. As such, the application complies with the Minimum Distance Separation requirements.

In this instance, the favourable consideration of the proposed zoning by-law amendment to permit emergency/transitional shelters with reduced parking requirements considering the Official Plan policies, the former staff report, and the current temporary use by-law, is considered good planning.

Traffic Impact Brief

On November 30, 2021, F.R. Berry & Associates submitted a traffic impact brief in support of the proposed temporary use by-law for up to 40 refugees in six apartment suites. The study indicates that, subject to the Ministry of Environment and Climate Change (MOECC)- now known as the Ministry of Environment, Conservation and Parks - and approval of site servicing, the occupancy could increase to 80 residents.

The report indicates that, based on surrounding businesses and uses in the area, average daily traffic volumes in this section of Schafer Side Road are likely to be less than 500 vehicles. Sight distances are not an issue as this portion of Schafer Sideroad is a flat and straight section. The incentivized employment program established under the current temporary use by-law is expected to turnover approximately 60 residents per year.

The report confirms that, initially, none of the residents are expected to own or operate a vehicle, as transportation would be provided. While the number of trips per day is difficult to estimate, it is not expected to generate more than 5 to 10 trips in either the morning or afternoon peak hours. Total daily trips will not be more than 50 to 100 in total.

As such, the report concludes that the capacity of the two-lane rural road is usually considered to be between 1,000 and 1,500 vehicles per day. The additional trips generated by the proposed use will result in a total well below the capacity limits and Schafer Side Road will continue to operate at a good level of service with a high

degree of safety. "Vehicle trips generated by the proposed residential facility will have no significant impact on traffic operation."

The proposed amendment does not change the status of the expectation of number of trips and the status of Schafer Side Road.

Conclusion

The proposed zoning by-law amendment represents a practical and sustainable land use solution that aligns with the Provincial Planning Statement, 2024 (PPS 2024) and Norfolk County's Official Plan. The adaptive reuse of an underutilized agricultural research facility provides a unique opportunity to address emergency/transitional needs while supporting local economic development. The incentivized temporary accommodations program integrates affordability, workforce training, economic and industrial growth, particularly through its partnership with Titan Trailers and other nearby employers.

The proposal ensures minimal environmental impact, avoids encroachment on prime agricultural land, and optimizes existing infrastructure, consistent with PPS directives for resource efficiency and agricultural protection. By mitigating labour shortages in the local manufacturing sector, it strengthens economic stability and workforce sustainability within the region. The proposed amendment supports broader provincial planning objectives, including the creation of complete and equitable communities.

The policies of Section 6 of PPS 2024 seem to imply a framework for flexible implementation, recognizing that land use decisions must consider local context and outcomes. These provisions support the adaptive reuse of existing structures and enable municipal decision-makers to approve site-specific solutions that advance provincial and municipal interests.

By balancing accommodations for emergency/transitional needs, employment, and agricultural protection, the proposed amendment reflects good planning principles and aligns with PPS 2024's outcome-oriented approach. It responds directly to Norfolk County's unique social and economic conditions, demonstrating a responsible and strategic land use decision.

This application, previously supported by Council and staff through a temporary use, represents a practical, forward-thinking approach to planning. It supports provincial and municipal goals for housing, economic development, and sustainable land use, ensuring that Norfolk County remains resilient, inclusive, and economically competitive. Approval of this amendment is consistent with provincial policy, the Norfolk County Official Plan, and represents good planning.

Report prepared by:



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Consulting Engineers, Architects & Planners

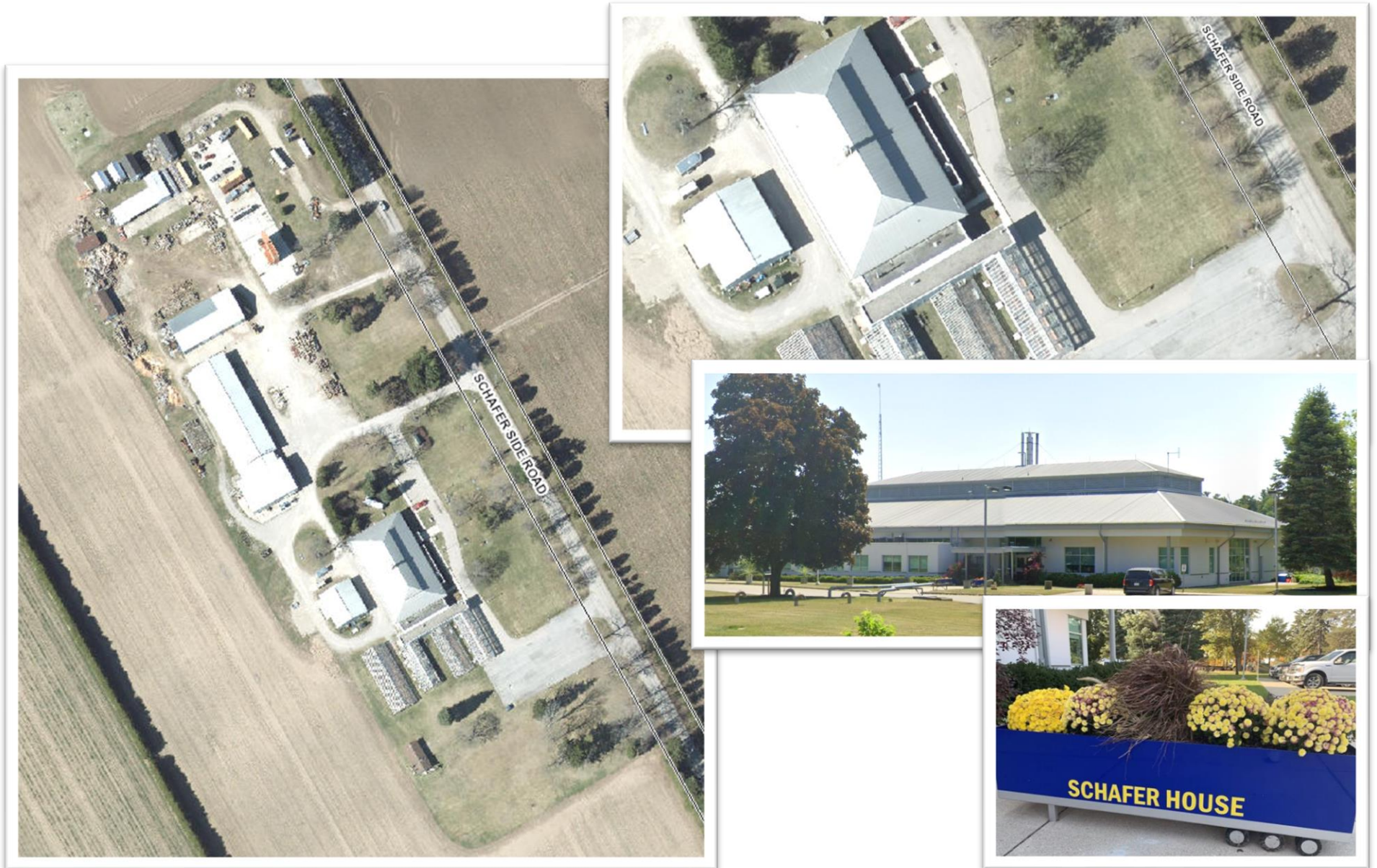
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Appendices



Appendix A to Planning Justification Report – Site Plan
Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment



Appendix B to Planning Justification Report – Section 2 Planning Act – Provincial Interest
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

Section 2 Planning Act – Provincial Interest - Compliance Table

This appendix demonstrates how the proposed application is consistent with Section 2 of the Planning Act.

Matter	Comments	
a) the protection of ecological systems, including natural areas, features, and functions;	The proposed development is located in an actively farmed agricultural area. The lands do not contain natural features and protected vegetative species. The development does not cause negative impacts the environment.	✓
b) the protection of the agricultural resources of the Province;	Yes. The development represents an adaptive reuse of existing buildings that do not occupy agricultural production lands.	✓
c) the conservation and management of natural resources and the mineral resource base;	The development does not impact natural resources or the mineral resource base.	✓
d) the conservation of features of significant architectural, cultural, historical, archaeological, or scientific interest;	There are no such features on the subject property or in the general area. The former research facility has been preserved, yet renovated, internally for the temporary accommodations of families.	✓
e) the supply, efficient use, and conservation of energy and water;	The lands are privately serviced.	✓
f) the adequate provision and efficient use of communication, transportation, sewage and water services, and waste management systems;	Yes. All these services have been provided or are available. The lands are located within a reasonable commute (vehicle 5 min, or bicycle 20 min) to the Courtland Employment area. The proposed use is provided with carpool transportation and bussing opportunities. The buildings are supported by private water and sanitary services.	✓
g) the minimization of waste;	Yes. Waste generated on-site will be minimal.	✓
h) the orderly development of safe and healthy communities; (h.1) the accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	Yes. The development represents an adaptive reuse of existing buildings that do not require the extension of municipal services. Renovations occur to meet current codes and standards. The proposed development is an adaptive reuse of existing buildings for emergency/transition shelters, providing a temporary incentivized accommodations program that brings employees to	✓

Appendix B to Planning Justification Report – Section 2 Planning Act – Provincial Interest
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

	employers such as Titan Trailers through the transportation, training, education, and employment of not less than one (1) member of a family unit, which greatly contributes to Titan’s industrial employment base, contributing to a healthy community in Courtland.	
i) the adequate provision and distribution of educational, health, social, cultural, and recreational facilities;	The incentive program trains and educates those members of a family for employment. This program has been implemented successfully with Titan Trailers located in Courtland.	✓
j) the adequate provision of a full range of housing, including affordable housing;	Yes. The use provides temporary and incentivized accommodations to families who are immigrants, refugees, and earn low incomes. <ul style="list-style-type: none"> • 40% reduced rent • Utilities and property taxes covered • Vehicles made available temporarily until family makes enough money to afford their own vehicle. 	✓
k) the adequate provision of employment opportunities;	Yes. The incentive program is directly linked with providing employment opportunities with nearby employers such as Titan Trailers in Courtland.	✓
l) the protection of the financial and economic well-being of the Province and its municipalities;	The application helps achieve this intent. The program improves the industrial education, training, and employment for employers such as Titan Trailers, helping to sustain and grow the facility and operations. The application will contribution to the financial and economic well-being of the Province and County.	✓
m) the co-ordination of planning activities of public bodies;	The applications will be circulated to all applicable public bodies and agencies for comments as determined by the requirements of the Planning Act and Norfolk County.	✓
n) the resolution of planning conflicts involving public and private interests;	This will be achieved through the planning approvals process. None are anticipated.	✓
o) the protection of public health and safety;	The subject lands are not located within an area of natural hazard.	✓
p) the appropriate location of growth and development;	Yes. While this is not ‘growth’, rather it is an adaptive reuse of existing buildings for emergency/transition shelters, in an	✓

Appendix B to Planning Justification Report – Section 2 Planning Act – Provincial Interest
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

	appropriate location, considering the proximity to the employment base.	
q) the promotion of development that is designed to be sustainable, to support public transit, and to be oriented to pedestrians;	The proposed use does not rely on public transit; however, transit is provided temporarily through the incentivized accommodations program to Titan Trailers and local needs.	✓
r) the promotion of built form that, (i) is well-designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant;	Yes. This is an adaptive reuse of existing buildings. Amenity areas are provided.	✓
s) the mitigation of greenhouse gas emissions and adaptation to a changing climate.	Not applicable to this development.	✓

Section 3 of the *Planning Act* requires that, in exercising any authority that affects a planning matter, planning authorities “shall be consistent with the policy statements” issued under the Act and “shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be”. A review and conformity analysis is provided in this report.

Provincial Planning Statement 2024 – Policy Compliance Table

This appendix demonstrates how the proposed application is consistent with those applicable policies of the Provincial Planning Statement.

Section	Policy	Comments	
Chapter 2: Building Homes, Sustainable Strong and Competitive Communities			
2.1	<p>Planning for People and Homes Summary: Section 2.1 outlines the planning framework for population and employment growth in Ontario, emphasizing that municipalities must base forecasts on provincial projections while ensuring adequate land availability for diverse housing and land use needs over a 20- to 30-year horizon. It promotes the creation of complete communities by supporting varied land uses, improving accessibility, and enhancing social equity to meet the needs of all residents.</p>		
2.1.1	As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.		
2.1.2	Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.		
2.1.3	<p>At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.</p> <p>Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.</p>		
2.1.4	To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:		
a)	maintain at all times the ability to accommodate residential growth for a minimum of 15 years	The proposed amendment will allow for the continuation of temporary accommodations for people in need where the incentive/employment program will help families establish themselves financially and to afford permanent accommodations.	✓
b)	Maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply	The development is proposed on lands that are on private services and does not impact municipal infrastructure.	✓

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

2.1.5	Where planning is conducted by an upper-tier municipality, the land and unit supply maintained by the lower-tier municipality identified in policy 2.1.4 shall be based on and reflect the allocation of population and units by the upper-tier municipality.		
2.1.6	Planning authorities should support the achievement of complete communities by:		
a)	accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses	Not applicable	✓
b)	improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and	Not applicable	✓
c)	improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.	The proposed application facilitates a program to assist people and families of various ages, abilities and helps to create income for those who are in need.	✓

Section	Policy	Comments	
Chapter 2: Building Homes, Sustainable Strong and Competitive Communities			
2.2	Housing Summary: Section 2.2 outlines guidelines for planning authorities to ensure a diverse range of housing options and densities that meet the projected needs of current and future residents. This includes setting minimum targets for affordable housing, facilitating various housing types to support community well-being, promoting land-efficient densities, and prioritizing transit-oriented development near transit corridors and stations.		
2.2.1	Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:		
a)	establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households	While the temporary accommodations and incentivized employment program are not related to setting minimum targets for the provision of low and moderate income housing, it assists those people and families with getting a 'good start' to achieving the outcome of this policy. It provides transitional opportunities	✓

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

		for vulnerable populations such as refugees and low-income families to achieve temporary accommodations security.	
b)	<p>permitting and facilitating:</p> <ol style="list-style-type: none"> 1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents 2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3; 	<p>The proposed zoning by-law amendment provides for a unique housing program that may not exist in the municipality. The program has a direct impact on improving the social, health and wellbeing of families in need.</p> <p>The proposed application facilitates the permanent redevelopment of the former agricultural research facility which have a direct impact on supplying people employment, education and training with nearby existing employment uses.</p>	✓
c)	<p>promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and</p>	<p>The adaptive reuse of the former research station facility is an efficient use of lands that has no impacts on the surrounding area.</p>	✓
d)	<p>requiring transit-supportive development and prioritizing intensification</p>	<p>Not applicable.</p>	✓

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

Section	Policy	Comments	
Chapter 2.8: Employment			
2.8.1	<p>Supporting a Modern Economy</p> <p>Summary: Section 2.8.1 promotes economic development by encouraging a diverse mix of employment and institutional uses. Planning authorities should maintain suitable employment sites, identify strategic investment areas, and support compact, mixed-use development. Industrial and small-scale warehousing are encouraged near transit in strategic growth areas, while development within 300 meters of employment areas must minimize impacts on their viability. Major office and institutional developments should be directed to major transit stations or strategic growth areas.</p>		
2.8.1.1	Planning authorities shall promote economic development and competitiveness by:		
a)	providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;	The County is in the process of increasing employment lands in Courtland. There are existing employment uses with some undeveloped designated lands for additional employment uses. The proposed applications facilitate the ability to increase employment within the existing facilities and future new employment opportunities through expansions and new employment uses. The incentivized temporary accommodations program provides for the education, training and employment at the Titan Trailers facility which helps address the local labour demand and contributes to the regional economy.	✓
b)	providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses	The County supported boundary expansions to include a future industrial park in Courtland.	✓
c)	identifying strategic sites for investment	See b) above.	✓
d)	encouraging intensification of employment uses and compatible, compact, mixed-use development	See a) above. The incentivized temporary accommodations program encourages intensification of employment uses.	✓

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 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

Section	Policy	Comments	
Chapter 3: Infrastructure and Facilities			
3.6	<p>Sewage, Water, and Stormwater</p> <p>Summary: Section 3.6 outlines planning requirements for sewage, water, and stormwater services. It prioritizes timely growth accommodation and optimization of existing municipal services, with municipal systems favored for settlement areas. Private communal services are alternatives when municipal options are unavailable, while individual on-site services are permitted under suitable conditions. Partial services may be allowed to address specific failures. For stormwater management, planning must minimize volumes and contaminants, promote green infrastructure, and align with comprehensive municipal plans.</p>		
3.6.2	Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas	Noted. The lands are not within a settlement area.	✓
3.6.3	Where municipal services are not available, planned or feasible, private communal sewage services and private communal water services are the preferred form of servicing for multi-unit/lot development	See 3.6.4	✓
3.6.4	<p>Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual onsite sewage services and individual on-site water services may be used</p> <p>At the time of the official plan review or update, planning authorities should assess the long-term impacts of individual on-site sewage services and individual on-site water services</p>	The portion of lands that is occupied by the current emergency/transition shelters are privately serviced by water and sewage, achieving Ministry approval.	✓
3.6.8	Planning for stormwater management shall:		

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 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

a)	be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;	The lands are not being altered. All private services and stormwater management will be left as existing.	✓
b)	minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;	The lands will remain in their existing state.	✓
c)	minimize erosion and changes in water balance through the use of green infrastructure;	Existing	✓
d)	Mitigate risks to human health, safety, property and the environment	Existing	✓
e)	Maximize the extent and function of vegetative and previous surfaces	Existing	✓
f)	promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and	Existing.	✓
g)	align with any comprehensive municipal plans for stormwater management	Not applicable.	

Section	Policy	Comments	
Chapter 4: Wise Use and Management of Resources			
4.3	Agriculture Summary: Section 4.3.1 and 4.3.2 policies are a safeguard to Ontario's agricultural lands for long-term productivity and economic prosperity by designating and protecting prime agricultural areas, including specialty crop lands, and prioritizing their use for agriculture. They ensure a geographically continuous agricultural land base, promote		

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

	compatible agriculture-related and on-farm diversified uses, and provide clear protection hierarchies to preserve the highest-quality lands. This approach supports the sustainability of the agri-food network and balances land use planning with the need to protect vital agricultural resources for future generations.		
4.3.1	Planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.	Noted.	✓
4.3.2	As part of the agricultural land base, prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture.	Noted. No impacts are created by recognizing the existing emergency/transition shelters.	✓
4.3.3	Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, and 3 lands, and any associated Class 4 through 7 lands within the prime agricultural area, in this order of priority.	Noted.	✓
4.3.2.1	<p>Permitted Uses</p> <p>In prime agricultural areas, permitted uses and activities are: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance.</p> <p>Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on provincial guidance or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.</p>	<p>See 4.3.2.3.</p> <p>Greenhouses are being renovated for year round production of produce. Those who reside in emergency shelters and wish to assist with the greenhouse operation will be provided with free produce. This advances the incentive program to help reduce costs of living. It also brings a charitable initiative to the local community.</p>	✓

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

4.3.2.2	In prime agricultural areas, all types, sizes and intensities of agricultural uses and normal farm practices shall be promoted and protected in accordance with provincial standards.	The existing agricultural activities are not affected by the recognition of the existing temporary accommodations facility.	✓
4.3.2.3	New land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.	The proposed zoning by-law amendment recognizes the established emergency/transition shelters and temporary accommodations program which was a result of the adaptive reuse of the former research facility. There are no livestock facilities in the area that would impact the use. This test was complied with through the original planning approvals achieved.	✓
4.3.2.4	A principal dwelling associated with an agricultural operation shall be permitted in prime agricultural areas as an agricultural use, in accordance with provincial guidance, except where prohibited in accordance with policy 4.3.3.1.c).	Not applicable.	

Section	Policy	Comments	
Chapter 4: Wise Use and Management of Resources			
4.3.5	Non-Agricultural Uses in Prime Agricultural Areas Summary: Section 4.3.5 addresses non-agricultural uses in prime agricultural areas, emphasizing that such uses are generally discouraged but may be permitted in limited circumstances. Essentially, impacts on the agricultural system must be avoided or, where avoidance is not possible, minimized and mitigated through an agricultural impact assessment or equivalent analysis. It is intended that non-agricultural uses do not compromise the viability and sustainability of agricultural lands.		
4.3.5.1	Planning authorities may only permit non-agricultural uses in prime agricultural areas for:		
a)	extraction of minerals, petroleum resources and mineral aggregate resources; or	Not applicable.	✓
b)	limited non-residential uses, provided that all of the following are demonstrated:		
	1. the land does not comprise a specialty crop area;	The lands subject to the application are not farmed as the proposed application is to recognize and permit the emergency/transition shelters use and temporary	✓

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

		incentivized accommodations program created from the adaptive re-use of the former research facilities.	
	2. the proposed use complies with the minimum distance separation formulae;	Yes. There are no livestock operations in the area. This test would have been met for the previous planning application.	✓
	3. there is an identified need within the planning horizon identified in the official plan as provided for in policy 2.1.3 for additional land to accommodate the proposed use; and	The intent of this policy remains sufficiently addressed as the application is to establish the permanent emergency/transition shelter use and temporary incentivized accommodations program within an existing building currently being used for such purposes. Section 2.1.3 makes provision for and encourages a range and mix of land uses within the 20 year planning horizon. The proposed application aligns with the intent of this policy.	✓
	4. alternative locations have been evaluated, and i. there are no reasonable alternative locations which avoid prime agricultural areas; and ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.	As mentioned above, the intent of this policy is maintained. The location is particularly important as the emergency/transition shelter and incentive program is located in close proximity to the Titan Trailers manufacturing facility where people are transported between locations for employment and training purposes. Longer distances increase costs and the property was selected strategically for these purposes and that the former agricultural research facilities operation was not being re-established or other agricultural type uses were not viable.	✓
4.3.5.2	Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.	The portion of the property that is not used for agricultural purposes was previously analysed by previous planning consultants and the municipality. The adaptive re-use of the buildings do not have an impact on any existing agricultural operations.	✓

Section	Policy	Comments	
Chapter 6: Implementation and Interpretation			
6.1	<p>General Policies for Implementation and Interpretation</p> <p>Summary: Section 6.1 of the Provincial Planning Statement, 2024 (PPS 2024) establishes the framework for implementing and interpreting provincial planning policies to ensure a comprehensive, policy-led approach. All planning decisions must be consistent with the PPS, even if municipal Official Plans or Zoning By-laws have not been updated to reflect the latest policies. This section affirms that provincial interests, such as housing, economic development, infrastructure, and environmental protection, must be upheld while allowing flexibility in balancing planning priorities. It emphasizes the importance of coordinated, cross-jurisdictional planning efforts and integration with other legislative frameworks, including the Ontario Human Rights Code, the Canadian Charter of Rights and Freedoms, and Indigenous treaty rights under Section 35 of the Constitution Act, 1982. Additionally, it encourages monitoring and reporting on the implementation of PPS policies to ensure effective, sustainable, and equitable land use planning.</p>		
6.1.1	The Provincial Planning Statement shall be read in its entirety and all relevant policies are to be applied to each situation.	This subsection states that the PPS must be read in its entirety, and all relevant policies must be applied to each situation. This allows for a balanced approach to decision-making, where policies can be interpreted in a way that responds to the specific context of a proposal while still being consistent with the overall objectives of the PPS.	✓
6.1.4	When implementing the Provincial Planning Statement, the Minister of Municipal Affairs and Housing may make decisions that take into account other considerations to balance government priorities.	This subsection grants the Minister of Municipal Affairs and Housing the ability to balance planning priorities when making decisions, recognizing that different planning considerations may need to be weighed against one another. This provides a mechanism for flexibility in cases where economic, housing, and social needs require context-specific solutions that may not fit neatly within standard interpretations of the PPS. While this application does not require the Minister’s decision, it reinforces the municipality’s authority to make decisions similarly.	✓

Appendix C to Planning Justification Report – Provincial Planning Statement 2024
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

<p>6.1.5</p>	<p>Official plans shall identify provincial interests and set out appropriate land use designations and policies. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas.</p> <p>In order to protect provincial interests, planning authorities shall keep their official plans up-to date with the Provincial Planning Statement. The policies of the Provincial Planning Statement continue to apply after adoption and approval of an official plan.</p>	<p>Section 6.1.5 and 6.1.6 clarify that planning authorities must keep their Official Plans and zoning by-laws up to date, but decisions must still be consistent with the PPS even if municipal plans have not yet been updated. This ensures that planning authorities can apply PPS policies in a way that reflects current local needs and permits transitional solutions, such as adaptive reuse projects or site-specific zoning amendments, even if broader policy frameworks are still evolving.</p>	<p>✓</p>
<p>6.1.6</p>	<p>Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and the Provincial Planning Statement by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development.</p>		<p>✓</p>
<p>6.1.12</p>	<p>Density targets represent minimum standards and planning authorities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of the Provincial Planning Statement or any other provincial plan.</p>	<p>While these sections are geared towards density and are not directly applicable to the proposed application, they reinforce the idea that planning policies should adapt over time to reflect evolving local conditions and growth management objectives. Council has already taken steps to grow the Courtland industrial area and recognize the importance of providing housing. The Official Plan encourages addressing special needs such as the proposed emergency/transition shelter supported by the incentive program and aligns with the general concept of adapting to evolving conditions and growth over time.</p>	<p>✓</p>
<p>6.1.13</p>	<p>Minimum density targets will be revisited at the time of each official plan update to ensure the target is appropriate.</p>		<p>✓</p>

Appendix D to Planning Justification Report – Official Plan Compliance
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

Norfolk County Official Plan – Policy Compliance Table

This appendix demonstrates how the proposed application is consistent with applicable policies of the Norfolk County Official Plan.

Section	Policy	Comments	
Section 2.2 Goals & Objectives			
2.2	This section of the Official Plan sets out six “Goals and Objectives” to which the following five are applicable to the proposed residential development:		
2.2.1	Strong and Diversified Economy	The proposed application uniquely contributes to a strong and diversified economy by offering emergency/transition shelters and an incentivized temporary accommodations program through the adaptive reuse of underutilized buildings. This program has demonstrated success through the education, training, and employment of people in the program at Titan Trailers. The property's proximity to key employment areas not only supports and expands a major economic driver in Norfolk County but also generates income to sustain refugees, immigrants, and low-income families, creating a mutually beneficial business model. Additionally, the program can be extended to other employers in Courtland, Delhi, and the surrounding agricultural areas.	✓
2.2.2	Protecting and Enhancing the Natural Environment	The lands are not subject to environmental constraints.	✓
2.2.3	Maintaining and Enhancing the Rural and Small Town Character	The exterior of the former research station is being preserved, which captures the history and cultural heritage of the building, and revitalizes the use of lands and buildings. No negative impacts are anticipated, thus maintaining the rural character of this area.	✓
2.2.4	Maintaining a High Quality of Life	The proposed development implements the objectives of this policy by providing emergency/transition shelters and an incentivized temporary accommodations program for employment in close proximity to people through the redevelopment of the existing building.	✓
2.2.5	Upgrading and Expanding Infrastructure	The proposed application is not subject to Section 2.2.4.	N/A
2.2.6	A Well Governed, Well Planned and Sustainable County	The proposed application will help improve financial stability of those families in need through the provision of the adaptive	✓

Appendix D to Planning Justification Report – Official Plan Compliance
 Emergency/transition Shelter and Temporary Incentivized Accommodations – Zoning By-law Amendment

		reuse of the former research station. While this is a private initiative, the goal of this policy implies support from the County.	
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Section	Policy	Comments	
Section 4.0 Ensuring Economic Vitality			
4.1	The County encourages economic development across the County in a manner that balances social, cultural, natural environment, and other initiatives. This Plan recognizes the pre-eminence of agriculture as the principal economic activity in the County. This Section of the Plan addresses broad areas and influences of economic activity, including agriculture, tourism, natural resources and resource-related activities, employment activities, and the redevelopment of potentially contaminated sites.		
4.4	<p>Promoting Agriculture</p> <p>Agriculture is the dominant use of land in the County... It is important to protect prime agricultural land which is the resource base upon which the local agricultural economy depends.</p> <p>It is the policy of this Plan to promote the further development of Norfolk County's agricultural industry and to provide support to local farmers. To support this policy, the County may undertake the following measures:</p>	The proposed application is an adaptive reuse of an existing former research station building. Agriculture remains unaffected by the use, which currently has temporary permission to permit housing accommodation.	✓
	a) Protect the agricultural land base and discourage or prohibit those uses that unnecessarily take agricultural land out of production or which may conflict with farm operations;	The application does not take lands out of agricultural production and does not impact local farm operations.	✓

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Section	Policy	Comments	
Section 4.7 Employment Activity			
4.7	Employment and industrial activities play a significant role in the economic vitality of Norfolk County. The County shall maintain an appropriate employment land supply and shall use the planning policy framework of this Plan to encourage and support new industrial technologies, new employment sector development, and local employment initiatives.		
4.7	b) The County shall promote the reuse of vacant industrial and other underutilized sites within the County.	The lands are not vacant industrial lands but would otherwise be underutilized if the research station were to not have a purpose. This application seeks to permit emergency/transition shelters as a permitted use to the zone through an incentivized accommodations program to help refugees, immigrants and low-income housing.	✓

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Section	Policy	Comments	
Section 5.3 Housing			
5.3	<p>The provision of housing is an essential part of planning in Norfolk County. It is desirable to have close cooperation between all levels of government and the private sector in order to provide for sufficient and affordable housing, and a stable residential housing market. The County shall ensure that a full range of housing types are provided to meet the anticipated demand and demographic change...</p> <p>The County shall ensure that a full range of housing types and densities are provided to meet the anticipated demand and demographic change. All forms of housing required to meet the social, health, and well-being of current and future residents, including those with special needs, shall be encouraged.</p>		
5.3.2	<p>Special Needs Housing</p> <p>Special needs housing includes housing for the physically and developmentally challenged and disabled, chronically mentally ill, youth and children with emotional difficulties, seniors, those requiring emergency shelter, assisted housing accommodating individuals, and households with low to moderate incomes. The County intends to improve access to housing for those people with special needs, including assisted housing for low-income people, seniors housing, as well as various forms of supportive housing, including group homes and emergency/transitional housing, subject to the policies of this Plan.</p> <p>The following shall be the policy of the County:</p>		
	<p>a) The County shall work with other agencies and local groups to assess the extent of the need of these forms of housing.</p>	<p>Through war and tribulation, Canada is being sought out for refuge. There is a great need for accommodations that are geared to assisting others find safe shelter, education, and employment. The accommodations proposed achieve this function. Furthermore, the incentivized housing program provided by Mike and Sandy Kloepfer, currently linked to Titan Trailers, allows for refugees, immigrants, and low-income families to have temporary accommodations and employment, along with temporary provision of transportation to and from the Titan facility, 7 kilometres away.</p>	✓
	<p>b) The County shall support community agencies interested in pursuing additional funding from the Provincial government to address identified needs for special needs housing.</p>	<p>The owners are not seeking funding; however, should the County successfully pursue additional funding, the owners would be willing to consider additional investment in the provision of such housing.</p>	✓

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	c) The County shall support the distribution of special needs housing provided by community groups.	Currently, refugees from Ukraine are taking shelter in the existing facility on the subject lands. They are their own community group being supported by the Kloepfer's incentivized housing program. Families with low incomes, immigrants and refugees have the opportunity for temporary accommodations and employment in Courtland, Delhi and the agricultural area, such as the successes achieved at the nearby Titan Trailers industrial facility.	✓
	d) When reviewing any proposal for the purposes of establishing, through new construction or conversion of existing structures, a group home, hostel, temporary shelter, emergency shelter or other similar form of special needs shelter, the County shall be satisfied that:		
	i) the traffic generated from the facility can be adequately accommodated by the road network and will not have a significant impact on adjacent land uses, particularly residential uses;	There is minimal traffic generated as there are 13 units on-site. Transportation is temporarily provided as a carpool, through a vehicle provided by Titan Trailers. The traffic study confirms that the use will not impact the road network.	✓
	ii) the facility is of a design which maintains the scale, density, appearance, character, and continuity of existing land uses in the surrounding area and immediate neighbourhood;	The facility has existed since 1933. It has been renovated for emergency/transitional shelters. The facility is in good structural standing and compliments the area aesthetically. No impacts are generated from or on nearby uses.	✓
	iii) the land, buildings, and structures for the proposed facility conform to the provisions of the Zoning By-law, including those related to parking requirements, ensuring that on-site parking is sufficient to meet the needs of residents, support staff, and visitors; and	The property is significant in size. The disturbed area is sufficient to provide parking for all 13 units; however, the ride share program provided by the Kloepfer's program allows for an underutilization of available parking.	✓
	iv) where appropriate, that a license has been granted by the licensing Provincial or Federal agency.	Not required.	✓

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Section	Policy	Comments	
Section 6.7 Rural Area			
6.7	The Rural Area includes all land outside of the Urban Areas, Hamlet Areas, and Resort Areas. The Rural Area includes lands designated for Agricultural....		
6.7.1	<p>Agricultural Land</p> <p>One of the primary components of the County's economy and heritage is the extensive area of productive agricultural land, which covers most of the County. The County will preserve and foster, as one of its primary objectives, a thriving agricultural industry and the associated rural lifestyle. The land base dedicated to agricultural production must, therefore, be protected and the use of the land must be predominantly agriculturally oriented [...]</p> <p>The main threat to the preservation of the rural character lies in the potential influx of large numbers of incompatible uses into the agricultural areas. Although a certain degree of rural non-farm growth provides benefits to the community, the extent of such development should be limited.</p> <p>The following shall be the policy of the County:</p>	<p>The lands will remain predominantly agricultural. No agricultural land will be taken out of production, nor any impacts generated by the proposed adaptive reuse of the former building.</p> <p>The County does not have an influx of incompatible uses in the agricultural area, and policies exist to control incompatibilities.</p>	✓
	a) The County is committed to the protection of prime agricultural land. The County recognizes, however, that where growth and development occur, it is likely that land with significant agricultural productivity will need to be utilized. Priority shall be given to less productive agricultural land for non-	No agricultural land is being taken out of production.	✓

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	agricultural development, where it is feasible and practical to do so.		
a)	Unless otherwise designated, use of prime agricultural land shall be subject to the policies of Section 7.2 (Agricultural Designation) of this Plan. New non-agriculturally related uses on prime agricultural land shall not be permitted, unless otherwise specifically permitted by this Plan.	The policy does not consider the adaptive reuse of existing former buildings for purposes that are encouraged by other policies of the Official Plan. In this instance, the existing temporary use for emergency/transition shelters is not new. There is a demonstrated need for such a use. The re-use of existing buildings does not involve prime agricultural lands, does not create incompatibilities, and does not create impacts on the agricultural land base.	✓

Section	Policy	Comments	
Section 7.0 Managing Land Use			
7.2	<p>Agriculture</p> <p>The Agricultural Designation is intended to strengthen the agricultural community in the County. The policies are designed to protect agriculture from the intrusion of incompatible uses, such as non-farm related residential dwellings and other uses that are sensitive to agricultural practices. The policies of the Agricultural Designation are also intended to provide the opportunity for businesses that support agricultural operations to locate on farms or in close proximity to farms. The policies support the agricultural community by providing opportunities for farm operators to engage in secondary business activities that supplement farm incomes.</p>	The adaptive reuse of the former building on-site does not offend the intent of this policy. Limited non-agricultural uses are permitted by the Official Plan policy 6.7.1. Agricultural production lands are not impacted by the proposed accommodations. The provision of emergency/transition shelters and an incentivized temporary accommodations program in conjunction with the local employers such as Titan Trailers, is of benefit to those with low incomes, a need for employment, and transportation to a from their place of employment and other areas to obtain items of essential need.	✓
7.2.1	<p>Permitted Uses</p> <p>a) The primary use of land shall be for the growing of crops, including biomass, nursery and horticultural crops, the raising of livestock, the raising of other animals for food, fur and fibre, including poultry and fish, aquaculture, apiaries and maple syrup production, and agro-forestry.</p>	Yes. The primary use of land is for active farming practices, including growing of crops.	✓

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7.2.2	<p>Land Use Policies</p> <p>j) Limited non-agricultural uses may be permitted in the Agricultural Designation, provided that all of the following policies are met. An amendment to this Plan shall be considered on the basis of the following criteria:</p>	<p>No amendment required. The policy permits limited non-agricultural uses, avoiding natural features, compatible with the surrounding agricultural community, and satisfies a direct need to supply incentivized housing for refugees, immigrants, and low-income families, directly related to employment, education, and training at nearby employment establishments such as the Titan Trailers industrial facility.</p>	✓
	<p>i) the land is characterized by rolling topography, forest cover, and rivers and streams. Such lands will be given preference for the establishment of outdoor recreation uses, subject to the policies of Section 3 (Sustainable Natural Heritage);</p>	<p>Not applicable.</p>	
	<p>ii) the use shall not be permitted in Provincially Significant Wetlands, Hazard Lands, or any Natural Resource Areas, where the resource has not yet been extracted, identified on Schedules “B” or “J” to this Plan;</p>	<p>The existing buildings are not located in Provincially Significant Wetlands, Hazard Lands or any Natural Resource Area.</p>	✓
	<p>iii) the proposed use shall not be permitted in or on adjacent land to the Natural Heritage Features identified on Schedule “C” and/or Tables 1 and 2 or on Schedule “G” and Table 6 of the Lakeshore Special Policy Area Secondary Plan, unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions, in accordance with the policies of Section 3.5 (Natural Heritage Systems) and Section 11 (Lakeshore Special Policy Area Secondary Plan) of this Plan;</p>	<p>The existing buildings are not located on or adjacent to Natural Heritage Features.</p>	✓
	<p>iv) there is a demonstrated need within the planning horizon of this Plan for the proposed use;</p>	<p>Emergency/transition shelters and an incentivized temporary accommodations program catering to special needs and low incomes are of great need and is encouraged by the Official Plan.</p>	✓

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	v) the use shall be located on lower priority agricultural land unless it has been demonstrated that there are no reasonable alternative locations that avoid the use of prime agricultural lands;	The adaptive reuse of the existing buildings does not impact agricultural lands nor their productivity.	✓
	vi) the use shall comply with the minimum distance separation formulae;	There does not appear to be a livestock facility within 2 kilometres of the subject property.	✓
	vii) the use will be compatible with existing or planned uses in the vicinity; and	The lands are surrounded by agriculture production lands. There are no incompatibilities created by the adaptive reuse of the existing buildings.	✓
	viii) impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands are to be mitigated to the extent feasible.	Not applicable.	
	p) To avoid land use conflicts within the Agricultural Designation, it is the policy of this Plan that the Minimum Distance Separation (MDS) Formulae be used to establish appropriate standards for separating incompatible uses from existing, new or expanding livestock facilities. These standards will also apply to circumstances where new residential lots or other non-agricultural land uses are proposed in proximity to existing livestock facilities. [...] The Zoning By-law shall establish separation distances between livestock operations (to be defined within the By-law) and non-agricultural land uses, in accordance with Minimum Distance Separation Formulae.	The are no livestock operations in the area.	✓