



Norfolk County Office of the Mayor

April 15, 2025

The Honourable Nathaniel Erskine-Smith
Minister of Housing, Infrastructure and Communities
House of Commons
Ottawa, ON K1A 0A6

Dear Minister Erskine-Smith,

**Re: Canada Housing Infrastructure Fund – Four Units As-of-Right Eligibility
Criterion Considerations**

On behalf of Norfolk County Council, I would like to express our appreciation for the launch of the Canada Housing Infrastructure Fund (CHIF). As a single-tier rural municipality with both urban and agricultural areas, Norfolk County fully supports the federal government's commitment to increasing housing supply and accelerating critical infrastructure projects. We look forward to continued collaboration to help achieve these shared priorities.

Norfolk County has submitted an application under the Direct Delivery Stream of CHIF for the Port Dover Northwest Booster Station — a vital project that will enable 449 new homes in a growing lakeside community by improving water pressure and fire flow capacity. It is a direct example of how municipal infrastructure can unlock housing development, and we believe our submission reflects the goals of CHIF.

We are, however, writing to express concern about the eligibility requirement for municipalities with populations over 30,000 to implement four units as-of-right zoning by Spring 2025. While we understand and support the broader intent to facilitate gentle density, the reality is that Norfolk's aging rural infrastructure was not designed to support widespread intensification without major capital investment.

We have already made progress by adopting three units as-of-right through a public planning process. And we are actively working on additional options for accommodating density — including exploring four-unit permissions — as part of a comprehensive review that includes technical studies and public consultation. This work is ongoing and demonstrates our clear commitment to supporting growth responsibly.

In parallel, our Council has gone on record in support of other key housing solutions — such as encouraging higher density within new subdivisions and enabling additional



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farm severances — as part of a balanced, locally appropriate strategy to grow our housing supply.

However, it is critical to emphasize that we cannot support this growth on our own. Norfolk County is currently facing over **\$500 million** in required water and wastewater infrastructure investments to support new housing. We believe growth is necessary to help fund these long-term infrastructure needs, but the financial burden of making these upfront investments cannot fall solely on municipalities.

We respectfully request that your office consider offering greater flexibility in applying the four-unit criterion — particularly for rural municipalities where infrastructure limitations and the need for responsible planning must be factored in. We would welcome the opportunity to discuss alternative approaches that support housing delivery while maintaining public trust and planning integrity.

Thank you for your continued leadership. Norfolk County is eager to be part of the housing solution, and we look forward to working together to build strong, sustainable communities.

Sincerely,

A handwritten signature in black ink that reads "Amy Martin".

Mayor Amy Martin
Norfolk County