



COMMITTEE OF THE WHOLE MINUTES

Tuesday, June 6th, 2023

6:00 p.m.

**Tay Valley Municipal Office – 217 Harper Road, Perth, Ontario
Council Chambers**

ATTENDANCE:

Members Present: Chair, Councillor Angela Pierman
Reeve Rob Rainer
Deputy Reeve Fred Dobbie
Councillor Andrew Kendrick
Councillor Korrine Jordan
Councillor Greg Hallam
Councillor Marilyn Thomas
Councillor Wayne Baker

Staff Present: Amanda Mabo, Chief Administrative Officer/Clerk
Olivia Trudel, Executive Assistant
Noelle Reeve, Planner (left at 7:14 p.m.)

Regrets: None

1. CALL TO ORDER

The meeting was called to order at 6:00 p.m.
A quorum was present.

2. AMENDMENTS/APPROVAL OF AGENDA

The agenda was adopted as presented.

3. DISCLOSURE OF PECUNIARY INTEREST AND/OR CONFLICT OF INTEREST AND GENERAL NATURE THEREOF

None at this time.

4. APPROVAL OF MINUTES OF PUBLIC MEETINGS

None at this time.

5. DELEGATIONS & PRESENTATIONS

None.

6. PRIORITY ISSUES

i) Report #CAO-2023-14 – Animal Pound Contract Update.

Recommendation to Council:

“**THAT**, Schedule “A” to the Animal Pound Services Agreement be amended as per Report #C-2023-14 – Animal Pound Contract Update;

AND THAT, the necessary by-law be brought forward to Council.”

ii) Report #CAO-2023-15 – Municipal Report Card.

Members were asked to send any feedback to the CAO/Clerk by email to be considered in next year’s report card.

Recommendation to Council:

“**THAT**, the Municipal Report Card be produced annually as outlined in Report #CAO-2023-15 – Municipal Report Card.”

iii) Integrity Commissioner Services Annual Report – 2022.

Recommendation to Council:

“**THAT**, the Integrity Commissioner Service Annual Report – 2022 be received for information.”

iv) Proposed 2023 Provincial Policy Statement – Comments Be Forwarded to Media.

The Planner circulated and outlined a “Revised for Submission” report – *attached, page 6*

The Planner informed the Committee that the deadline has been extended to August 4th. The Committee requested that the Township’s submission be made now, before the end of June and not wait for the August deadline.

The Committee suggested that a media release be prepared that includes an introduction paragraph with three main concerns with the draft Provincial Policy Statement and provide a link to the full revised report for further information that can be provided to the media.

Recommendation to Council:

“THAT, the Municipality’s response to the Environmental Registry of Ontario (ERO) regarding ERO Number 019-6813 Review of Proposed Policies Adapted from A Place to Grow and the Provincial Policy Statement to Form a New Provincial Planning Policy Instrument be forwarded to local media for information.”

- v) **Report #CBO-2023-06 – Building Department Report – January – May 2023.**

Recommendation to Council:

“THAT, Report #CBO-2023-05 – Building Department Report – January - May 2023 be received as information.”

- vi) **Appointment of Soccer Volunteer.**

Recommendation to Council:

“THAT, the Council of the Corporation of Tay Valley Township appoint the following volunteer for the Tay Valley Soccer Program, subject to the Criminal Records Check Policy:

- Kiefer McBride.”

7. CORRESPONDENCE

- i) **23-06-01 – Council Communication Package.**

The Committee agreed to bringing forward to Council a resolution of support regarding reducing municipal insurance costs to the June Council meeting.

Recommendation to Council:

“THAT, the 23-06-01 Council Communication Package, excluding items 11 to 14, be received for information.”

- ii) **Municipal Letter of Support for the Application of the Perth Family Health Organization to Become the Perth Family Health Team.**

Recommendation to Council:

“THAT, the Council of the Corporation of Tay Valley Township send a letter of support to Ontario Health in support of the application of the Perth Family Health Organization to become the Perth Family Health Team.”

- iii) **OPP Council Crimes Event Fundraiser.**

Councillor Thomas and Councillor Jordan volunteered to be “arrested” with Council in agreement that the charity would be the Perth & Smiths Falls District Hospital Foundation with funds being directed for the purchase of an MRI Machine. The goal will be to raise \$5000.00.

8. COMMITTEE, BOARD & EXTERNAL ORGANIZATION UPDATES

- i) **Bolingbroke Cemetery Board.**
Councillor Wayne Baker.

The Committee reviewed the minutes that were attached to the agenda.

- ii) **Committee of Adjustment** – *deferred to the next meeting.*

- iii) **Fire Board.** – *deferred to the next meeting.*
Councillor Wayne Baker, Councillor Greg Hallam, Councillor Marilyn Thomas

Councillors Baker, Hallam and Thomas gave a brief overview of the BBQ Fundraiser for the South Sherbrooke Firefighters Association.

- iv) **Library Board** – *deferred to the next meeting.*
Councillor Andrew Kendrick.

- v) **Pinehurst Cemetery Board** – *deferred to the next meeting.*
Councillor Fred Dobbie.

- vi) **Police Services Board.**
Reeve Rob Rainer.

The Committee reviewed the minutes that were attached to the agenda.

- vii) **Green Energy and Climate Change Working Group** – *deferred to the next meeting.*
Councillor Greg Hallam and Councillor Angela Pierman

- viii) **Municipal Drug Strategy Committee** – *deferred to the next meeting.*
Councillor Korrine Jordan.

- ix) **Mississippi Valley Conservation Authority Board** – *deferred to the next meeting.*
Councillor Andrew Kendrick.

- x) **Rideau Valley Conservation Authority Board.**
Councillor Angela Pierman

The Committee reviewed the minutes that were attached to the agenda.

- xi) **County of Lanark.**
Reeve Rob Rainer.

Reeve Rainer summarized topics that were discussed at the County Council meeting:

- AGM Lanark County Housing Corporation
- Auditor's Report
- \$1.6 million in surplus Lanark County Housing Corporation funds
- Housing and Homelessness Report
- Social Services Report
- Paramedics Report

The Planner left at 7:14 p.m.

9. CLOSED SESSION

i) **CONFIDENTIAL: Identifiable Individual – Staffing Update.**

The Committee moved “in camera” at 7:14 p.m. to address a matter pertaining to personal matters about an identifiable individual, including municipal or local board employees, regarding a Staffing Update and the Chief Administrative Officer/Clerk and Executive Assistant remained in the room.

The Committee returned to open session at 7:21 p.m.

The Chair Rose and reported that the Committee received a staffing update.

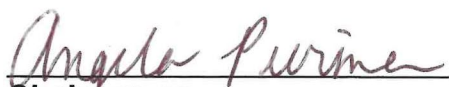
10. DEFERRED ITEMS

**The following items will be discussed at the next and/or future meeting:*

- ***See Township Action Plan – distributed separately to Council***

11. ADJOURNMENT

The Committee adjourned at 7:22 p.m.


Chairperson


Olivia Trudel, Executive Assistant

May 24th, 2023

Report #PD-2023-11
Noelle Reeve, Planner

COMMENTS ON DRAFT 2023 PROVINCIAL PLANNING STATEMENT

STAFF RECOMMENDATION

It is recommended:

“THAT, the Municipality’s response to the Environmental Registry of Ontario (ERO) regarding ERO Number 019-6813 Review of Proposed Policies Adapted from A Place to Grow and the Provincial Policy Statement to Form a New Provincial Planning Policy Instrument be submitted by the deadline of June 5, 2023;

AND THAT, the comments also be submitted to the Minister of Municipal Affairs and Housing, Steve Clark, the Minister of Natural Resources and Forestry, Graydon Smith, to the local MPP, John Jordan and to the Rural Ontario Municipal Association.”

BACKGROUND

On April 6, 2023 the province proposed a new *2023 Provincial Planning Statement* to replace the *2020 Provincial Policy Statement* by integrating it with *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. The province’s stated goal is to ensure the land use policy framework “is housing-supportive” and that it will help to “meet the target to construct 1.5 million homes by 2031”.

The current *Provincial Policy Statement* (PPS) is a high-level policy document that provides direction on matters of provincial interest as they relate to land use planning. The current PPS came into effect in 2020 and the PPS is ordinarily reviewed and updated every 5-10 years. Subsection 3(5) of the *Planning Act* provides that any municipal decision on a planning matter shall be consistent with the PPS currently in effect.

The 2020 PPS covers a wide range of land use planning topics including:

- Efficient use and management of land;
- Provision of a range of housing, including affordable housing;
- Protection of the environment, prime farmland and natural resources;
- Mitigation of climate change;
- Enabling economic development;
- Planning transportation corridors and other infrastructure; and
- Protection of people and property from natural and human made hazards.

The *2023 Provincial Planning Statement* proposes policies “grouped under five pillars”:

- Generate an appropriate housing supply;
- Make land available for development;
- Provide infrastructure to support development;
- Balance housing with resources;
- Implementation.”

The ERO posting states the proposed 2023 PPS would require municipalities to:

- Provide a range and mix of housing options;
- Designate and protect specialty crop areas and prime agricultural areas, eliminating the requirement to use the provincially-mapped Agricultural System;
- Permit more housing on farms, including residential lot creation, subject to criteria;
- Allow more residential development in rural settlements and multi-lot residential development on rural lands, including more servicing flexibility;
- Implement intensification policies;
- Allow Settlement Area boundary expansions and new Settlement Areas without the municipality demonstrating the need for expansion;
- Protect water resources and features and encourage watershed planning;
- Update cultural heritage policies to align with *Ontario Heritage Act* (OHA);
- Prepare for the impacts of a changing climate and develop approaches to reduce greenhouse gas emissions and improve air quality;
- Work with school boards to integrate planning for schools and growth;
- Undertake early engagement with Indigenous communities and coordinate with them on land use planning matters to support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights; and
- Affirm that efficient land-use patterns contribute to increased equitable access to housing, employment, parks and transportation, and encourage municipalities to apply an equity lens on planning matters and engage stakeholders early in the process.”

Finally, the ERO notice states, “As of April 6, 2023, natural heritage policies and related definitions remain under consideration by the government. Once proposed policies and definitions are ready for review and input, they will be made available through a separate posting on the Environmental Registry of Ontario”.

The commenting period for *ERO Number 019-6813 Review of Proposed Policies Adapted from A Place to Grow and the Provincial Policy Statement to Form a New Provincial Planning Policy Instrument* ends June 5, 2023.

DISCUSSION

Tay Valley Township supports a number of the proposals in the Draft 2023 Provincial Planning Statement:

- **Climate change mitigation and adaptation** are of great importance to Tay Valley Township. The Township has already experienced exacerbated flooding, as well as drought, and other devastating impacts such as the derecho, extreme heat, and increased disease carrying pathogens (Lyme disease, West Nile virus, etc.). Tay Valley has adopted a Climate Action Plan approved by the Federation of Canadian Municipalities and has a Green Energy and Climate Change Working Group;
- **Retention of natural hazards policies** related to flooding and slopes is welcome because the Township contains 32 lakes and 9 rivers and many steep slopes;
- **Low Impact Development** as it relates to stormwater management through green infrastructure (swales, permeable pavement, etc.) will help to maintain the Township's rural landscape and supports biodiversity and is usually cheaper than pipes and concrete to manage stormwater;
- **Watershed Planning** (undertaking planning at the scale of watersheds) provides better protection of the Township's many lakes and rivers than planning by artificial municipal boundaries;
- **Water Resource Systems** planning provides for better ecological and hydrological integrity for the Townships 32 lakes and 9 rivers; and
- **Retention of policies on human made hazards** is welcome as the Township contains some brownfields, etc.

Tay Valley Township also has strong concerns about a number of proposals in the Draft 2023 Provincial Planning Statement:

- **Loss of local control.** The *2020 Provincial Policy Statement* (PPS) states that, "Municipal Official Plans are the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning". The 2023 Draft Provincial Planning Statement removed that statement and added section 4.3.3.2 which states that Official Plans and Zoning By-laws, "shall not contain provisions that are more restrictive than policy 4.3.3.2 except to address health or safety concerns". Tay Valley Township objects to this major curtailment of its ability to manage land uses throughout its geography.

The Draft 2023 PPS gives the Minister of Municipal Affairs and Housing the power to override municipal decisions (e.g., Official Plan, Minister's Zoning Orders) and impose

the development of large carbon-footprint housing that is more profitable for developers to build instead of supplying affordable housing.

- **Loss of rural landscape.** The 2023 PPS removed wording from the 2020 PPS that stated “rural settlement areas shall be the focus of growth and development” and that sought “compatibility with the rural landscape”. Tay Valley Township has eight Hamlets. The remainder of its geography is largely rural (approximately 70%) or agricultural land (approximately 30%). With the removal in the Draft PPS 2023 of the requirement for a comprehensive review to justify settlement area expansion, Tay Valley Township’s landscape will face pressure to allow low density inefficient development that is the hallmark of sprawl (as defined by the Ontario Professional Planners Institute, the American Planning Association, and the American Farmland Trust).

Sprawl style land use has been shown repeatedly to cost municipalities more money in inefficient infrastructure costs than clustered development (e.g., in studies by Hemson, Smart Prosperity Institute, Bloomberg, and Strong Towns, etc.).

- The Township would like to see language included in the Draft 2023 PPS requiring new settlement area designation and settlement expansion to demonstrate financial sustainability of infrastructure costs, avoid leapfrog development, and protect other provincial interests (e.g., mitigate climate change, protect biodiversity, provide a range of housing types, etc).
- The removal of the requirement for consideration of “cross-jurisdictional issues” makes it unclear whether sprawl style development could occur on the borders of the Township without its input.
- **Loss of agricultural land.** Agricultural lots makes up 27% of all lands in Tay Valley Township. The multiple dwellings and multiple severances proposed for the first time in prime agricultural land represent a seismic change in Ontario’s land use policies. The impact of allowing three residential units on prime agricultural land and allowing for the severance of up to three lots in prime agricultural land would affect lots in two of the three geographic townships in Tay Valley Township (Bathurst and North Burgess) that have not seen their land use pattern change in decades.

Permitting these severances and additional dwellings reduces Tay Valley residents’ **food security** by allowing sprawl on the Township’s most productive farmland.

- **Reversal of affordable housing.** The housing stock in Tay Valley Township is currently 98% single family dwellings. The Draft 2023 PPS proposes to remove the 2020 PPS definition of “affordable” for both rental units and home ownership based on the Canada Mortgage and Housing Corporation’s (CMHC) definition of “affordable” as a household paying no more than 1/3 of their income for shelter. This definition continues to be the standard for housing providers. Changing wording to encourage a range of housing options is a step backward in achieving affordable housing.

A recent study by WSP for Lanark County indicated that less than half of the residents in Lanark County could afford to purchase a house in 2022. To provide a greater range of housing options, the province should support the County of Frontenac's proposal for it to provide a public utility for communal septic services so that multi-unit dwellings could be offered in Tay Valley Township's eight Hamlets.

- **Removal of Natural Heritage Systems.** The natural heritage features of Tay Valley Township are unique. Tay Valley Township lies at the southernmost point of northern Ontario ecosystems and the northernmost point of southern Ontario ecosystems. It is the easternmost point of the biosphere known as The Land Between (headwaters for most of southern Ontario) and the westernmost point of the Frontenac Arch Biosphere.

The Draft 2023 PPS removes the entire section of the 2020 PPS covering the protection of Natural Heritage (including significant wetlands, woodlands and wildlife habitat). Instead a box with the statement that "natural heritage policies remain under consideration by the government" was all that was offered. The Township believes that it is premature of the province to present a document designed to guide land use across the province without a section on natural heritage.

- **Increased environmental impacts.** Changes presented in the Draft 2023 PPS that allow more scattered low-density housing, reduce the previous 2020 PPS focus on waste management, and are silent on protecting biodiversity will undermine the ability of the Township to achieve the objectives in its Climate Action Plan.
- **Lack of Indigenous consultation.** The Township sits on unceded Algonquin Territory. The province has not communicated with local indigenous communities about increasing sprawl within their traditional territories. In addition, the Draft 2023 PPS requires municipalities to undertake early engagement with Indigenous communities and coordinate with them on land use planning matters to facilitate knowledge-sharing, support consideration of Indigenous interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights. However, without providing funding, the province is promoting a superficial approach to engagement.
- **Economic Impacts to the Township.** The Draft 2023 PPS will result in increased costs to Township for undertaking liaison with the County Housing Manager, consulting with Indigenous interests; watershed planning; promotion of inefficient land use, and increased costs for infrastructure.

OPTIONS TO BE CONSIDERED

Option #1 (Recommended) – The Planning Department submit the Municipality's response to the Environmental Registry of Ontario for the *Proposed 2023 Provincial Planning Statement* as well as to Minister of Municipal Affairs and Housing Steve Clark, Minister of Natural Resources and Forestry, Graydon Smith, local MPP John Jordan, and to the Rural Ontario Municipal Association.

Option #2 – Council receives the report for information.

FINANCIAL CONSIDERATIONS

If the Draft 2023 Provincial Planning Statement passes in its entirety, the burden on the Planning Department will increase considerably, with the need to hire consultants or extra staff to coordinate with Housing Service Managers, define agricultural areas, etc., These costs will either be passed through to applicants or paid for by the Township's residents.

STRATEGIC PLAN LINK

Environment: Tay Valley continues to be known for its environmental policies and practices. Our residents have access to clean lakes and a healthy, sustainable environment.

Housing: Residents have access to a wide range of affordable and healthy housing options.

Development: Development is increasingly 'clustered', and our hamlets are thriving.

Food and Farming: The Township has a flourishing farming community. Farmers are able to earn sustainable incomes. Residents have access to healthy local food and products.

CLIMATE CONSIDERATIONS

Poor land use decisions (allowing multiple severances and additional dwelling units on farmland, promoting low density housing, etc.) will threaten food security, increase fossil fuel use, reduce carbon sequestration and, therefore, will impede the Township's work to achieve its Climate Action Plan mitigation and adaptation goals.

CONCLUSIONS

The Planner concludes that the Township should comment on the Environmental Registry of Ontario proposal so that the province hears the specific impacts of proposed 2023 Provincial Planning Statement on our rural area. In the end, it appears housing approvals may be slower due to new demands placed on the Planning Department while agricultural land and biodiversity will be severely impacted by the sprawl-promoting policies of the Draft 2023 Provincial Planning Statement.

ATTACHMENTS

- 1) Specific comments on the ERO questions
- 2) Ontario Farmers Association Comments
- 3) Lot Creation Illustration from Dr Wayne Caldwell

Prepared and Submitted By:

Approved for Submission By:

**Noelle Reeve,
Planner**

**Amanda Mabo,
Chief Administrative Office/Clerk**

Attachment 1 Specific comment on the ERO questions

1. What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?

The Township is opposed to many of the proposed policies because they are a huge step backward in community and land use planning and the harm the policies will do does not even seem necessary. (See attachment 1.)

Reports by The Alliance for a Liveable Ontario, the Regional Planning Commissioners of Ontario (RPCO) and others have concluded that there is more than enough land within existing urban boundaries across the Greater Golden Horseshoe to accommodate and exceed the housing target set by the province. In fact, the RPCO concluded that Ontario has more than 1.25 million permits approved to build, but because there is no set timeline by which a developer must build the home they are not being built.

The Township is opposed to the policies that promote sprawl development by:

- removing the previous requirement that planning authorities establish and implement minimum targets for **intensification** and **redevelopment** within built-up areas,
- allowing Settlement Area boundary expansion or creation of a new Settlement Area without a comprehensive review or the requirement to demonstrate the need for expansion,
- allowing 3 severances on Agricultural land plus 2 additional dwelling units for the primary dwelling
- reducing density targets from 80 units/ha to 50 units/ha in 29 large and fast-growing municipalities.

Sprawl development has many negative consequences that planners have worked hard to prevent over the past 50 years in Ontario. Sprawl consumes farmland. Sprawl consumes nature whose features (plants, streams, insects, fish and animals) provide biodiversity.

This sprawl development is low density development (one home per lot) so it does not provide a wide enough range of housing types to produce affordable housing.

These sprawl policies do not provide enough density outside of Large and Fast-Growing Municipalities to support transit. Lack of access to transit means whole groups of residents cannot live in sprawl subdivisions which increases inequity. More cars and no transit means sprawl promotes a decrease in air quality.

The policy proposals for lowered density that increase sprawl also increase greenhouse gas emissions due to the need to travel by car to get to work or stores. The policy proposals related to sprawl increase greenhouse gases in the atmosphere because the carbon sequestration provided by the plants is lost when they are built on for housing and roads. These policy proposals accelerate climate disruption and make it harder for Tay Valley Township to meet its Climate Action Plan goals for mitigation.

The policy proposals related to encouraging housing on farmland threaten food security which makes it harder for Tay Valley to meet its Climate Action Plan goals for adaptation to climate disruption.

The proposed wording change in Section 2.1.4 of “complete communities” rather than the previous reference to “healthy, livable and safe communities” focuses on combining uses (housing, stores, schools) which is a good thing. But it leaves out any focus on promoting health and wellness, connection, programming for arts and recreation, etc.

The Township supports the retention of the policies on natural hazards, human made hazards and climate change.

The Township supports the added definition of Low Impact Development as it relates to stormwater management through green infrastructure (swales, permeable pavement, etc.).

The Township supports the added definition of Watershed Planning as undertaking planning at the scale of watersheds provides better protection of natural resources than planning by municipal boundaries.

The Township also supports the added definition of Water Resource Systems because recognizing that nature is best described through a systems perspective, rather than as discrete segments provides for better ecological and hydrological integrity.

2. What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?

Although the Township is not one of the 29 large and fast-growing communities, the impacts from the sprawl development that will occur from their reduced density targets will affect Tay Valley residents through increased air pollution, increased greenhouse gas emissions, and greater food insecurity.

3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?

The Township is concerned that Proposed Policy 2.2.1(a) removes the former definition and requirement that planning authorities establish and implement minimum targets for the provision of housing which is affordable to **low- and moderate-income households**. Instead, planning authorities would be required to co-ordinate land use planning and planning for housing with Service Managers to address the full range of housing options, including “housing affordability needs.”

The Township is concerned that the 2023 Proposed Provincial Planning Statement removes the requirement for compatibility with the rural landscape.

The Township would welcome funding to undertake the province’s requirement for “early engagement with Indigenous communities and to coordinate with them on land use planning matters to facilitate knowledge-sharing, support consideration of Indigenous

interests in land use decision-making and support the identification of potential impacts of decisions on the exercise of Aboriginal or treaty rights". Without funding for Indigenous communities to undertake studies, it will be difficult to have meaningful discussions.

4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?

The Township believes it is a dereliction of responsibility by the province that a new Provincial Planning Statement would be presented without any description of Natural Heritage Policies.

The Township shares the serious concerns of the Ontario Federation of Agriculture, Dr. Wayne Caldwell, Guelph University and the Ontario Farmland Trust that the proposed changes to agricultural policies will make it easier to establish more housing within prime agricultural lands (see attachments 2 and 3).

The Township is concerned that Draft policy 4.3.2.4 would permit a principal dwelling associated with an agricultural operation "to be located in prime agricultural areas as an agricultural use".

The Township is concerned that following from 4.3.2.4, Draft policy 4.3.2.5 would permit, "subordinate to the principal dwelling, up to two additional residential units in prime agricultural areas, provided certain conditions are met, including compliance with the minimum distance separation formulae and the appropriate provision of sewage and water services (among other requirements)".

While the Township supports additional residential units, it does not support those units then being able to be severed as is proposed by policy 4.3.3.1, meaning up to three lots may be created, potentially conflicting with the concept that they are subordinate to the principal dwelling.

With the estimated increase in number of houses that could be built on Agricultural land provided by Dr. Caldwell, the Township believes serious questions about groundwater supply, nitrate dilution capacity, and the ability of livestock operations to expand need to be answered before these policies are adopted.

Dr. Caldwell also questions whether these new lots will even increase affordable housing supply. "Will most farmers take the opportunities quickly to sever and then sit on these lots for their children or for a rainy day?"

The Township strongly objects to this form of development being proposed because it typifies sprawl with all its negative impacts.

The Township believes the province's policy on aggregates should be revised as, again, the amount of aggregate extraction approved is well over the amount needed well into the future.

The Township only has one designated heritage building and that is privately owned so the requirements for maintenance are not of particular significance.

5. What are your thoughts on the proposed policies regarding planning for employment?

The Township does not have a concern with the changes to employment lands as it contains very little land with that designation. The Township does wonder if by scoping the test for employment conversion, some residential developments may be negatively impacted by being built beside industrial uses in employment lands.

6. Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?

Perhaps the province should consider a lapsing date for development approvals if housing is not built since research by the Regional Planning Commissioners of Ontario reported that over 1.2 million units of housing have received development approvals but builders are not building these approved units.

The province should contribute funds to create co-operatives as they are one of the most effective ways to provide long term affordable housing.

The province should also require all new housing to meet Net Zero standards these standards produce lower heating and cooling bills thereby making housing more affordable.

The province should identify its land holdings that could be set aside to create affordable housing (using the Canada Mortgage and Housing Association definition).

Attachment 2

OFA submission to the Ontario Ministry of Municipal Affairs and Housing regarding the review of A Place to Grow (APTG) and Provincial Policy Statement (PPS)

<https://ofa.on.ca/resources/ofa-submission-to-the-ontario-ministry-of-municipal-affairs-and-housing-regarding-the-review-of-a-place-to-grow-aptg-and-provincial-policy-statement-pps/>

OFA submitted comments on the review of A Place to Grow (APTG) and Provincial Policy Statement (PPS) as the Ministry of Municipal Affairs and Housing (MMAH) seeks input on how to create a streamlined province-wide land use planning policy framework that enables municipalities to approve housing faster and increase housing supply. OFA sees that a merging of APTG and the PPS must demonstrate that provincial direction is explicitly satisfied to ensure all provincial interests are protected and balanced across Ontario. We are not against development but want to see provincial policies and legislation that meet the goals of all these provincial interests, without undermining Ontario's agricultural resources. We emphasize that many components of the current PPS are working well to achieve both goals of building houses and protecting farmland, and requests the provincial government recognize this and retain these beneficial policies.

OFA sees that APTG policies on urban intensification and densification must be included within the PPS for every municipality across Ontario to ensure the strength of the growth management framework provided by APTG is not lost. OFA supports fixed, permanent urban boundaries to limit the loss of agricultural land, thereby focusing future urban growth within existing urban boundaries. We further believe that in urban areas, higher density development should be mandated province-wide to take full advantage of existing infrastructure. OFA supports urban intensification/densification to protect agricultural land and create complete communities.

OFA wants to see PPS policies in Section 1.1.3.8 (Settlement Area Boundary Expansions) remain as is. Keeping these policies intact is critical for meeting joint goals of balancing farmland protection with urban development. Further, OFA wants to see Agricultural Impact Assessment (AIA) policies from APTG incorporated directly into the PPS policies on settlement area boundary expansions (APTG Policy 2.2.8.3 h). OFA asks that the Ontario government should designate all farmlands in Ontario that are outside of current settlement area boundaries as Greenbelt and afford them permanent protections from the threat of urban development.

PPS (2020) Policies 2.3.1 and 2.3.2 outline policies for the protection of *prime agricultural areas*, the designation of *prime agricultural areas* and *specialty crop areas* by planning authorities. OFA wants these policies to remain intact.

OFA sees that APTG (2020) Section 4.2.6 Agricultural System policies must be retained in the review of APTG-PPS. OFA wants to see the Agricultural System mapped, and its policies applied, protected, and enabled province wide. OFA supports the provincial mapping of the Agricultural Land Base, including identification of Candidate Areas for inclusion in the Agricultural Land Base. OFA requests that the government continue to review and update mapping upon a municipal request, as not all municipalities will have the capacity to undertake this work.

OFA sees Minimum Distance Separation (MDS) as an essential component of responsible land use planning that must continue to be in the revised APTG-PPS instrument. OFA maintains that both PPS (2020) Policy 2.3.3.3, requiring new land uses in prime agricultural areas, and Policy 1.1.5.8 requiring new land uses in rural areas, including the creation of lots and new or expanding livestock facilities, must continue to comply with MDS Formulae.

OFA wants to see an additional policy added to Section 2.3 Permitted Uses in the PPS. We request the following be added to clarify that on-farm accommodations for labour be permitted as an agricultural use, in accordance with PPS (2020) definitions and provincial guidance.

OFA supports the current lot creation policies under Section 2.3.4.1 of the PPS (2020) as is. OFA is utterly opposed to any re-introduction of lot creation policies in the agricultural area that may resemble policies in previous versions of the PPS. We desire to work with the Ontario government to increase density and housing in rural Ontario in ways that do not sacrifice farmland. Anywhere low-density housing already exists presents critical opportunities to advance “gentle density” that addresses the provincial housing supply, preserves farmland, and builds complete communities characterized by smart growth principles in land use planning.

OFA believes that in prime agricultural areas, the only permitted uses should be *agricultural uses*, *agriculture-related uses*, and *on-farm diversified uses*. OFA sees that the definition of *development* should be expanded to include a clause stating that “the full range of agricultural uses (as defined in the 2020 Provincial Policy Statement) do not constitute as *development*.”

When comparing Natural Heritage policies between APTG (2020) and the PPS (2020), OFA prefers Natural Heritage policies under Section 2.1 in the PPS (2020). Natural Heritage System (NHS) policies in APTG (2020) have introduced red tape for our members with the requirement for costly environmental impact studies and the requirement to retain buffers from features, which further push development onto farmland and contribute to farmland loss and inefficient use of land for farming. We further believe that PPS Policy 2.1.9 succinctly speaks to the relationship between natural heritage features and areas and agricultural lands; “nothing in policy 2.1 [Natural Heritage] is intended to limit the ability of agricultural uses to continue”, and we expect this policy to be universally applied and complied with. OFA cannot underestimate the importance of ground-truthing as a mandatory requirement in the identification and designation of natural heritage features. OFA believes municipalities and relevant ministries should be required to notify landowners and tenants that an evaluation is being undertaken on their property.

Lastly, OFA sees that the “Analysis of Regulatory Impact” provided in the consultation does not accurately reflect the ability to achieve these core proposed principles in the new APTG-PPS instrument in a short timeframe. We understand the government is looking to ‘reduce red tape’ to get more homes built faster. However, we urge the government to recognize that frequent provincial reviews and changes to plans and policies are a barrier to new housing development. Municipal capacity is limited and lags when adopting changes to provincial plans. OFA asks the Ontario government provides a period of policy stability in land use planning once upcoming changes are in place.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the review of A Place to Grow and Provincial Policy Statement. We must ensure that any future changes to Ontario's land use planning policy framework protect our agricultural land base and support our agri-food sector as an economic powerhouse.

Attachment 3 Illustrations from Dr. W. Caldwell's Power Point on Lot Creation Policies and the Future of Agriculture in Ontario



An image
from 1976
(Countryside
Planning)

Diagram 3. Scattered vs Clustered Non-farm Residential Development.

