



May 25, 2023

The Honourable Steve Clark, Minister
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON M7A 2J3

SENT VIA EMAIL: minister.mah@ontario.ca
Submitted via the Environmental Registry of Ontario
ERO: 019-6813

RE: Proposed Changes to the Provincial Policy Statement, 2023

The Honourable Minister Steve Clark:

At the May 15, 2023 Regular Council Meeting, the Council of the Township of North Huron discussed proposed changes to the Provincial Policy Statement, and offer the following comments:

1. Agricultural Lot Severances

The most significant change for Huron County proposed under the new PPS 2023 is the new policies for residential lot creation in prime agricultural areas.

Township of North Huron Council Comments:

Residential lot creation in prime agricultural areas has been discouraged since the Countryside Planning/Foodland Guidelines were issued by the Province of Ontario in the 1970s. The purpose of this provincial-wide planning document was to ensure the protection of prime agricultural land for food production.

Huron County is a prime agricultural area and agriculture is extremely important to the economy and the production of food. For over 50 years, Huron County has had strong Official Plan policies protecting this agricultural resource and directing non-agricultural related development to settlement areas. Staff and Council recognize the need for housing in the agricultural area and in response the first draft of the current North Huron Zoning By-law review proposes to allow for additional residential units in the AG1 and AG4 zones and expanded permissions for on-farm housing for farm labour. This allows for additional housing related to agriculture but does not

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fragment the land base. The Province's proposal to allow for scattered residential development through lot creation does not further the interests of the agricultural industry.

The opening up of scattered residential lot creation in the prime agricultural areas may:

- increase conflict with modern farming practices,
- increase MDS restrictions on the placement of new barns;
- reduce the number of units being built in settlement areas where municipalities have invested substantial funds on services (hard and soft),
- lost opportunities for infrastructure efficiency in settlement areas;
- increase the demand on municipalities to provide enhanced rural services (e.g. more frequent snow plowing, road maintenance, garbage collection, emergency services, etc.); and
- ring serviced settlement areas with unserviced residential development making it more difficult and costly for future settlement area expansions and extension of services.

It is requested that the Province provide clarification on the criteria in the policies for creating new residential lots (e.g. what is considered to be adjacent to a non-agricultural use and what are lower-priority agricultural lands). It is unclear if this is limited to adjacent to Settlement Areas, Recreational uses and Institutional uses, or if it opens it up for 3 new residential lots next to all existing residences including farm residences and those that have been severed as surplus. And further, does this also allow residential lot creation on any area that a farm considers lower priority or inconvenient to farm rather than just areas with lower capability soils. Clarification is also requested on the criteria that requires an existing access on a public road and whether that access must exist or can it be obtained as part of the process. This clarification would help to determine the number of new residential lots that could be eligible to be severed across Huron County and the effect of the policy on the agricultural industry.

If the Province's intention is to permit three (3) residential lots from every farm parcel, this has the potential to result in thousands of non-farm related lots in the agricultural areas across the County of Huron. The Province should reconsider this substantial policy direction change and the long term effects it will have on the protection of prime agricultural lands and maintaining the ability for farmers to farm. In addition, there may be other unintended consequences such as the effect of additional residences on the potential for future aggregate extraction.

The Huron County Planning Department, along with GIS staff, has completed an assessment of the impacts of the policy to determine the potential for new residential lot creation in the prime agricultural area in Huron County. The analysis included the number of properties zoned AG1, AG1-Special, AG2 or AG2-Special where a minimum of 25% of the property was zoned AG1. The analysis did not include parcels zoned AG3 or AG4. The results indicate that there are 8304 parcels within these agricultural zones and with the potential for three (3) new lots per parcel, the effect could be 24,912 new residential parcels in the prime agricultural area in Huron County. It is recognized that this estimate may vary due to the impacts of Minimum Distance Separation and access permits, but still give a sense of the potential impacts of the policy. The information is provided in the chart below (see following page).

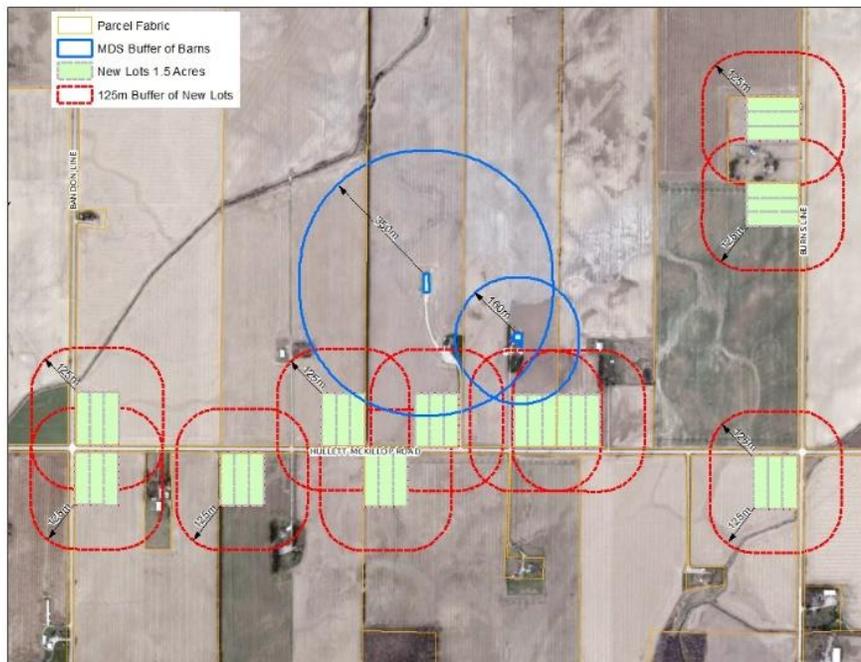
Chart 1: Assessing the Impact of Proposed PPS Lot Creation Policy in Prime Agricultural Areas within Huron County

Local Municipality	Number of Parcels zoned AG1 and AG1-Special	Number of Parcels zoned AG2 and AG2-Special	Total Number of Eligible Agricultural Parcels	Potential New Lots if 3 per parcel is possible
Ashfield-Colborne-Wawanosh	1367	0	1367	4101
Bluewater	1027	0	1027	3081
Central Huron	1105	45	1150	3450
Howick	622	44	666	1998
Huron East	1593	111	1704	5112
Morris-Turnberry	852	55	907	2721
North Huron	340	26	366	1098
South Huron	1026	91	1117	3351
County of Huron	7932	372	8304	24,912

Note: Due to the impacts of Minimum Distance Separation and access permits, it may be such that three (3) residential lots are not possible from every identified parcel.

To provide a visual context, an example was mapped using one Concession Block in Huron County, including the number of potential residential lots and the increased area that would no longer be eligible for the construction of a livestock barn due to Minimum Distance Separation setback requirements to these new lots (see image below).

Image 1: Example of Potential Impact of Proposed PPS Lot Creation Policy on Rural Concession



As discussed in the next item of the report, the Province is proposing to permit Settlement boundary expansions without the requirement for a Comprehensive Review. Understanding that some agricultural land may be needed to address the demand for housing, staff are supportive of eliminating this requirement for expansions and directing development to settlement areas which is a more efficient use of agricultural land than scattered residential development throughout the countryside.

Rather than the creation on non-farm related residential lots to increase the potential for housing in the agricultural area, the Province could consider amending the policy for surplus farm residence severances that requires the retained farmlands to be rezoned to prohibit a residence. The current limitation on the retained land could be removed, allowing a residence on these farm parcels where the severance was completed a certain number of years ago (e.g. 10 - 15 years or longer to avoid speculation). This would allow for additional housing related to agriculture and would not result in additional severances.

2. Settlement Area Expansions

The requirement for a Comprehensive Review to identify a new settlement area or expand a settlement area boundary has been removed in the proposed 2023 PPS.

Township of North Huron Council Comments:

As indicated above, staff are supportive of the change to streamline the process for expanding settlement areas where required based on adequate servicing (provided priority is given to expansion in fully serviced areas), logical extensions and addressing agricultural impacts. This is a more efficient use of land than scattered residential lots in the prime agricultural areas. The Province only encourages municipalities to set density targets for these expanded areas, but should give consideration to stronger language to ensure efficient use of these additional development lands.

3. Employment Areas and Employment Land Conversions

The definition of 'employment areas' is proposed to be changed in both the Planning Act and the new PPS to only include areas with heavy industry, manufacturing, and large-scale warehousing. It does not include commercial, institutional, retail or office not accessory to heavier industry.

Township of North Huron Council Comments:

No concerns with this proposed change as the North Huron Official Plan already excluded commercial, institutional and retail uses from being considered as employment areas.

4. Growth Targets

When updating official plans, municipalities will be required to have enough land designated for at least 25 years (a change from up to 25 years), with planning expressly allowed to extend beyond this horizon for infrastructure and employment areas.

Township of North Huron Council Comments:

No concerns with this proposed change. The County of Huron's updated population and housing needs projections (included in 2023 approved budget) will assist in establishing minimum density policies.

Should you have any questions or require additional information concerning this matter, please do not hesitate to contact me at the email address listed below.

Regards,



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cc. Ministry of Agriculture, Food and Rural Affairs minister.omafra@ontario.ca
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