

October 3, 2024

Provincial Land Use Plans Branch  
13th Floor, 777 Bay St  
Toronto, ON  
M7A 2J3

**Re: Consideration of transition of land use planning matters to facilitate the introduction of the Provincial Planning Statement issued under the Planning Act - ERO Number 019-9065**

This letter constitutes formal comments for ERO Number 019-9065, posted to the Environmental Registry of Ontario on August 20, 2024. It is the County's understanding that the Minister seeking feedback as to whether there are any specific planning matters in process that should be addressed through a transition regulation (under the *Planning Act*) to facilitate the implementation of the Provincial Planning Statement, taking effect on October 20, 2024.

Council and staff have reviewed the changes proposed within the Provincial Planning Statement and have considered the impacts of the policy changes on the established land-use policy framework that Perth County and our Lower Tier Municipal partners use to inform balanced and sustainable development across the County. As approximately ninety percent of the County's total land area is classified as having Class 1, 2, or 3 soil capability, agriculture has been, and will continue to be, the predominant land use activity in Perth County. Careful consideration has been made by the County to provide policies within the new draft Perth County Official Plan that balance the preservation of prime agricultural lands with the need for housing and jobs.

It is with this balanced perspective in mind that we respectfully provide the following comments for consideration:

1. Affordable Housing:

Within the 2024 PPS definition of "Affordable", "regional market area" has been removed and replaced with "municipality" and Planning Authorities are advised to work with Service Managers to determine the average purchase price of a home (as it

relates to the definition of “affordable”). This definition differs from the definition within the Development Charges Act, which uses the provincially-released housing bulletin to determine affordable home prices. In Perth County, housing numbers have historically been provided by United Way Perth Huron or CMHC. The United Way Perth Huron numbers include the City of Stratford and the Town of St. Mary’s, while the CMHC data only includes data for Stratford and North Perth. Without consistent information available across the entirety of Perth County, there is risk that including Stratford/St. Mary’s numbers or not including all of Perth County will skew the definition of “Affordable”. Where housing market data is non-existent or non-reliant, can the affordable housing numbers listed in the Provincial Housing Bulletin be used instead?

2. Recent Municipal Comprehensive Reviews

Where a recent Municipal Comprehensive Review (MCR) has been undertaken, identifying the land allocation needs required over the planning period, is there a requirement for Settlement Area expansions received following October 20, 2024 to consider the findings of the MCR?

3. Taxation for Dwellings Associated with Agricultural Operations

Section 4.3.2.4 states that a principal dwelling associated with an agricultural operation shall be permitted in prime agricultural areas as an agricultural use. Section 4.3.2.5 states that where a residential dwelling is permitted on a lot in a prime agricultural area, up to two additional residential units shall be permitted. Further, Section 4.3.2.6 states that farm worker housing is permitted as an agricultural use. What are the municipal taxation implications of identifying each of these 3 types of residential dwellings as agricultural?

The above-noted comments have been discussed by County Council and endorsed for submission to the Ministry for consideration regarding the important amendments proposed through ERO Number 019-9065.

Sincerely,



Rhonda Ehgoetz, Warden



Lori Wolfe, Chief Administrative Officer