



July 14, 2023

ERO number: 019-6813

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

Re: Comments on New Provincial Planning Policy (PPS) Instrument (to replace the Provincial Policy Statement and Growth Plan)

This letter addresses the proposed changes to the Provincial Policy Statement from the perspective of the County of Dufferin. The County of Dufferin supports increasing the supply of housing to accommodate the growing population, bolster economic growth, and improve housing affordability. We are however alarmed at several of the key changes which lack foresight, understanding of their long-term effects, and have irreversible negative consequences to rural prosperity.

The following are three themes related to the proposed changes, why these changes are problematic, and our recommendations:

Protect Prime Agriculture Land

Agricultural lands are integral to the future of a successful and prosperous Ontario. Increasing the housing supply cannot come at the expense of lost farmland. This land produces and supplies food, fibre, and fuel, among other things. Any proposals to increase housing must be done in careful consideration of the protection of agricultural lands.

We are encouraged to hear that rural lot creation policies included in the Draft PPS are to be clarified. Further we look forward to confirmation that the proposal to require municipalities to allow the creation of 3 additional lots to be eliminated. This proposal would result in significant and irreversible loss of agricultural land across Dufferin County and all of Ontario. The total agricultural land loss that could potentially result from the implementation of the proposed changes to the PPS would have a significant impact on the agricultural industry. Less than five per cent of Ontario's land base is prime agricultural lands (OMAFRA, 2016). According to Ontario Farmland Trust, Ontario is already losing 319 acres of farmland every day, as it is transitioned to other uses.

Dufferin County supports the proposal to recognize “additional residential units” (ARUs) as a permitted use in rural areas, including on a farm. This change is positive, as those units will serve to address and support the needs of farm families and operations with limited impacts on agriculture/agricultural operations. However, allowing for the severance of such units from a farm is not appropriate or supported, as it may inadvertently lead to additional residential lot creation and associated negative impacts on agriculture. An exception would be when an existing principal farm dwelling that is determined to be surplus to the farm operation in accordance with proposed policy 4.3.3.1 b.

The County of Dufferin supports PPS 2020 agriculture policies governing farmland and rural areas protecting the right to farm and the agricultural system in Ontario and supports the position of the OFA that those policies remain in place, particularly the lot creation policies.

We do understand the intent to support farmers, their families and agricultural workers by providing housing options that would let children taking over the farm or retiring parents live close by to assist with succession planning. To this end we would recommend the following:

- Policies that promote additional residential units (ARUs) subordinate to the principle dwelling on agricultural parcels.

Restrict Boundary Expansions

The current PPS 2020 requires that settlement boundary expansions are almost exclusively conducted as part of the Municipal Comprehensive Review (MCR) process. While the proposed PPS 2023 would require “Strategic Growth Areas” to be identified by municipalities, it would also allow landowners to apply to have their land included within a settlement area boundary without any real criteria or consideration of best possible use for that land (as is done through the MCR process).

Evaluating the merits of individual boundary expansion requests in isolation will challenge staff and Council’s ability to ensure decisions support fully planned and complete communities for future generations. This includes ensuring infrastructure will be in place to support higher density developments which will help keep housing prices down.

These policies will lead to significant urban sprawl, especially of low-density housing which over the long term drives up costs per capita of both hard and soft services for all levels of government. Low-density suburbs would have a limited impact on housing supply while doing nothing to limit the increase of prices. These policies will create an undebatable legacy

of high costs for services in Ontario and continue to threaten further unnecessary loss of farmland.

In addition, there is already a significant supply of undeveloped land within existing settlement boundaries across Ontario. If developers have limited choices on what land to develop, it would naturally lead them to focus on developing these lands and other areas within existing settlement boundaries.

If these policies must stay, we would recommend the following additions:

- New lands brought into a settlement boundary can only permit high density housing. This would avoid issues of low-density unaffordability for residents and governments while still giving Developers options for boundary expansions.
- Require the removal of land from settlement boundaries that goes undeveloped for a period of time. In essence it would encourage landowners holding onto land to “move it or lose it”, therefore keeping land prices competitive.

Incentivize Intensification Targets

The proposed PPS 2023 supports intensification in principle, but without targets it is ineffective and will lead to urban sprawl. The challenge with intensification targets has often been that municipalities do not play an active role in deciding what land developers’ want to redevelop within settlement boundaries. As such Municipalities’ ability to achieve greater intensification is limited without additional tools.

To achieve intensification, we recommend:

- Introduce a charge similar to the previous park-land dedication cash-in-lieu payment to be levies on developments which do not meet high density targets. Municipalities would then be required to redistribute those funds to developers’ whose redevelopments surpass intensification targets within core settlement areas.

Summary

The County of Dufferin strongly agrees with the Housing Affordability Task Force statement “that shortage of land isn’t the cause of the problem”. Enacting the PPS 2023 as-is would weaken the systematic approach to land use planning in Ontario and create a legacy of harmful long term and irreversible impacts on land, agriculture, and financial sustainability.



We have provided recommendations that would create a better balance while still working to achieve goals to create more housing for all Ontarians. In summary those recommendations are:

1. Policies that promote additional residential units (ARUs) subordinate to the principle dwelling on agricultural parcels.
2. Require new lands brought into a settlement boundary be for high-density developments.
3. Require the removal of lands from settlement boundaries that go undeveloped after a reasonable amount of time.
4. Require low density developments to fund high density and redevelopments in core settlement areas.

Further, Dufferin County requests that the Province release a revised draft following the close of this initial commenting period and that municipalities be provided an opportunity for additional consultation and review. Given the importance of the PPS to planning for complete and sustainable communities, protecting our farmland and natural resources, we believe it is important to that we work together to get this right.

Sincerely,

Warden Wade Mills
(Mayor, Town of Shelburne)

Councillor John Creelman
(Mayor, Town of Mono)

Councillor Guy Gardhouse
(Mayor, Township of East Garafraxa)

Councillor Chris Gerrits
(Mayor, Township of Amaranth)

Councillor Janet Horner
(Mayor, Township of Mulmur)

Councillor Lisa Post
(Mayor, Town of Orangeville)

Councillor Steve Soloman
(Mayor, Town of Grand Valley)

Councillor Darren White
(Mayor, Township of Melancthon)

