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Ministry of Municipal Affairs and Housing
Ministry of Agriculture, Food and Rura Affairs

To whom it may concern,

Thank you for the opportunity to comment on the proposed Provincial Planning Statement.

The Township of Mulmur is generally supportive of increasing the supply and improvements to housing affordability. However, the Township is concerned with some of the proposed changes to the Provincial Policy Statement and Growth Plan contained in Bill 97. The Township is also unclear on certain proposed policies/amendments introduced through the new Provincial Planning Statement.

The Township is supportive of the general move to combine the two Provincial planning documents into a single document and the streamlining of the planning framework.

The Township is concerned with the impacts that the ERO posted proposed policy may have on the agricultural land base, including the fragmentation of agricultural land and increased non-agricultural uses into the agricultural areas. Mulmur values its agricultural heritage and contributions to the food chain and understands the importance of having a protected prime-agricultural area. The Township has received correspondence from Minister Clark regarding the removal of the proposed severance policy and is hopeful that a revised policy statement will address the Township's concerns regarding fragmenting farmland. The Township supports the concept of allowing more residential units on a current farm site, but favours a clustered approach on existing lots over the creation of additional non-farm parcels.

The Township is concerned that the strong policies of the growth plan, directing the majority of residential growth to fully serviced urban areas is being weakened and replaced with rural settlements and unsustainable sprawl.

The Township has had an opportunity to review the recent Natural Heritage policies and note a decreased level of protection within the definitions. The Township is happy to see that there is no policy proposed to prevent the Township from applying a greater level of protection than what is proposed in the PPS.

After reviewing the proposed policy, the Township is seeking the following:

- Clarification regarding additional study requirements/plans for watershed, natural heritage identification, stormwater, energy/climate, etc.
- Clarification required whether surplus dwelling severance are in addition or within the permitted three lots to be considered from agricultural properties. Additional consideration on how this may impact rural lot creation is warranted.
- Clarification on whether municipalities could set minimum parcel size for farms or utilize other tools to ensure that prime agricultural soils and future livestock farming is protected.
- Clarification on revised terminology of “parcel of urban land” to be replaced with “parcel of land” (related to additional dwelling units being permitted through draft policy 4.3.2), and further clarification related to farm help dwelling policies.
- Clarification is required on whether additional lot creation policies would apply to previously sterilized lands.

The Township of Mulmur supports the movement towards housing affordability but feels very strongly that maintaining a strong agricultural sector and local food supply is very important and should not be sacrificed if opportunities exist in urban areas and northern climates. The proposed Provincial Planning Statement should be reviewed with a long-term priority of a stable food chain and intensified urban areas.

Respectfully submitted,

Tracey Atkinson

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CAO/Clerk/Planner

TOWNSHIP OF MULMUR