

May 9, 2024

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

Re: Proposed Provincial Planning Statement - ERO Number 019-8462

This letter constitutes formal comments for the proposed Provincial Planning Statement 2024, posted to the Environmental Registry of Ontario on April 12th, 2024.

Council and staff have considered the changes proposed in the Provincial Planning Statement 2024. Some of the draft policies are welcome changes and would provide a more flexible policy environment. Others are extremely concerning and threaten the balanced land-use policy framework that Perth County and our Lower Tier Municipal partners have established to inform sustainable development in our communities.

The County of Perth has been diligently working towards a streamlined and supportive environment for responsible development of the needed residential and employment lands in our community. Careful consideration has been made to provide designated lands and policies in the new draft Perth County Official Plan to balance the need for housing, jobs and the preservation of the prime agricultural lands.

We respectfully provide the following comments for consideration:

Lot Creation in Prime Agricultural Areas

The proposed Provincial Planning Statement will allow up to 2 additional residential units where a residential dwelling is permitted on a lot in a prime agricultural area in accordance with provincial guidance, provided that specified criteria are met. The Province's stated intent of this policy is to permit more housing on farms for farmers, farm families and farm workers without creating lots.

The following section in the PPS suggests either intentionally or inadvertently that additional residential units established through the above-noted policies could be severed in accordance with specified criteria, meaning up to 3 lots may be created.

Whereas Council and planning staff are supportive of additional residential units in prime agricultural areas, the creation of up to 3 lots per agricultural parcel is concerning. The implications of increased lot creation in agricultural areas could lead to significant agricultural land loss and impact normal practices of farming operations. As such, it is recommended that the PPS policies supporting the creation of up to 3 additional lots, be removed.

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 the Provincial Planning Statement 2024.

Sincerely,



Rhonda Ehgoetz, Warden



Lori Wolfe, Chief Administrative Officer