

MUNICIPALITY OF MORRIS-TURNBERRY

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Provincial Land Use Plans Branch
13th Floor, 777 Bay Street
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Submitted online via the Environmental Registry of Ontario

RE: Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.
ERO Number 019-6813

To Whom It May Concern,

At their meeting on May 16th, 2023, the Council of the Municipality of Morris-Turnberry received a staff report outlining the proposed changes in the new Provincial Policy Statement and Bill 97. Council was supportive of proposed changes to the requirements for considering a settlement area boundary expansions, but expressed great concern regarding the proposed changes that would allow for additional lot creation in agricultural areas. Below is a summary of the concerns identified by Council for your consideration.

1. Agricultural Lot Severances

Proposed Changes

The most significant change for the Municipality of Morris-Turnberry proposed under the new PPS 2023 is new policies for residential lot creation in prime agricultural areas. The current PPS discourages residential lot creation in prime agricultural areas, with the exception of surplus farm residence severances. The changes would allow additional permanent residences and the severance of the additional residences, and the creation of new residential lots in the agricultural area (4.3.2.5 and 4.3.3.1).

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. Despite this, it is estimated by the Federation of Agriculture of Ontario that approximately 319 acres of farmland are lost to development and taken out of production in Ontario every day. Our agricultural lands are not only a finite resource, but also the foundation of the livelihoods of many families and family run agribusiness.

The Municipality of Morris-Turnberry is a prime agricultural area and agriculture is extremely important to the economy and the production of food for the province. For decades, the Municipality has had strong Official Plan policies protecting this agricultural resource and directing non-agricultural related development to settlement areas. Staff and Council do recognize the need for housing in the agricultural area and in response

have updated Zoning By-laws 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 fragment the land base. With current policies, Council is regularly asked to make decisions regarding conflicting land uses and considers many Minor Variance applications to regulate either agricultural operation expansion or residential development that doesn't conform to MDS restrictions. The Province's proposal to allow for scattered residential development through lot creation will harm existing operations and threaten the sustainability and growth potential of the existing 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;
- and increase the demand on municipalities to provide enhanced rural services e.g. more frequent snow plowing, road maintenance, garbage collection, emergency services, etc.
- 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, including 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 areas adjacent to Settlement Areas, Recreational uses and Institutional uses, or if it introduces the potential for 3 new residential lots next to all existing residences including farm residences and those that have been severed as surplus. 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 the Municipality and the effect of the policy on the agricultural industry.

If the Province's intention is to permit the creation of 3 residential lots from every farm parcel, this has the potential to result in thousands of non-farm related lots in the agricultural area across the Municipality. 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.

2. Settlement Area Expansions

Proposed Changes

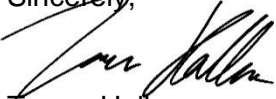
The requirement for a Comprehensive Review to identify a new settlement area or expand a settlement area boundary has been removed in the proposed 2023 PPS. With no requirement for municipal comprehensive reviews, municipalities could consider settlement area expansions at any time.

Staff Comments

Municipal staff and Council are supportive of the change to streamline the process for expanding settlement areas based on logical extensions, while taking agricultural impacts into account. 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.

Thank you for your consideration.

Sincerely,



Trevor Hallam
CAO/Clerk
Municipality of Morris-Turnberry