



Township of  
**Leeds** and the  
**Thousand Islands**

## **Planning and Development Department**

1233 Prince Street, P.O. Box 280

Lansdowne, ON K0E 1L0

Tel: 613-659-2415, 1-866-220-2327

ext. 226

Fax: 613-659-3619

Email: [director\\_planning@townshipleeds.on.ca](mailto:director_planning@townshipleeds.on.ca)

May 12, 2023

### **Delivered via the ERO website under ERO Number 019-6813**

Provincial Land Use Plans Branch

13<sup>th</sup> Floor, 777 Bay Street

Toronto, ON M7A 2J3

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

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At its meeting on May 8, 2023, the City Council of the Corporation of the Township of Leeds and the Thousand Islands passed the following resolution:

***THAT*** Council direct staff to prepare and submit a letter to the Government of Ontario through the Environmental Registry of Ontario's website indicating its concerns with being requested to comment on proposed PPS changes by June 6, 2023, in the absence of the any information on the proposed policy amendments to the natural heritage resource protection and noting concerns with respect to the potential negative impacts as a result of the proposed lot creation policies on prime agricultural lands.

Planning and Development Department staff of the Township have completed a review of the proposed changes to the PPS (2020). On behalf of City Council, we are submitting the following comments for the Province's review and consideration.

A significant portion of the lands within the Township are designated Agriculture, and there is an abundance of lands and waterbodies containing significant natural heritage resources. With respect to the proposed policies that would permit a maximum of three (3) lots created from a lot or parcel of land as it existed on January 1, 2023, staff have concerns that this will have negative impacts, resulting in fragmentation of prime agricultural designated lands within the Township. Opportunities for farming operations

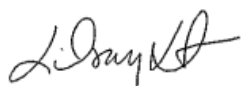
to expand in the future are likely to be harmed through the implementation of these policies. As Prime Agricultural lands are a resource of provincial significance, staff and the Council of our Township have significant concerns with the targeting of such lands with the proposed permissive lot creation policies to increase provincial housing supply.

The current and proposed PPS state that “when more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together, and that there is no implied priority in the order in which the policies appear.” It is not possible to provide comprehensive comments on the proposed provincial planning statement in the absence of a complete policy framework including the proposed policies pertaining to natural heritage resource protection.

We trust that these comments will be considered and are hopeful that further revisions will be made to the proposed PPS to address our comments with respect to lot creation on lands designated Prime Agriculture. Once the Natural Heritage policies are issued for comment, we request that the entirety of the draft PPS be issued for an additional round of review and comment. This would facilitate municipalities, relevant agencies and interested members of the public having an opportunity to undertake a holistic review.

If you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsay Lambert".

Lindsay Lambert, M.Pl. MCIP RPP  
Senior Planner  
Planning and Development Department