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August 4, 2023

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
17th Floor,  
777 Bay Street  
Toronto, Ontario,  
M7A 2J3

Sent via email to: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca) and [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca) and submitted online through the Environmental Registry of Ontario

Dear Minister Clark,

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

The HCFA proudly represents our membership of over 2000 farm families in Huron County. Huron County is the most agricultural productive county in Ontario, and we strive to ensure that sustainable, vibrant, and profitable farms succeed in our area. The HCFA's mission includes the protection of farmland as it is a critical component for a sustainable future in agriculture.

The Huron County Federation of Agriculture welcomes the opportunity to comment on the proposed Provincial Policy Statement. HCFA understands that the ministry continues to review emerging information regarding land use planning, however we were disappointed that this strategy did not focus on responsible land-use planning that prevents unnecessary farmland loss nor a strategy that supports communities reaching intensification targets.

The HCFA understands that the 3-lot severance portion of the original document is not being pursued. We are pleased with this update as this lot creation strategy would hinder the ability of sustainable agriculture in Ontario. The HCFA feels that the protection of Ontario's agricultural areas is a major concern.

In the Proposed Provincial Policy Statement (PPS) one concern is the removal of the requirement to use the provincially mapped agricultural system. The removal of this requirement would allow

for inconsistent classification of agricultural lands between municipalities. The current provincially mapped agricultural system is necessary to maintain consistency between different regions of the province. The Canada Land Inventory (CLI) identifies Class 1 to 3 soils plus specialty crop areas as Prime Agricultural land. All agricultural land deserves protection as different areas can support different types of agricultural activities.

The HCFA supports fixed permanent urban boundaries to limit the loss of agricultural land and future urban development should be concentrated within existing boundaries. This will strengthen the urban areas as a center of activity. The loss of agricultural land needs to be justified and expansion of urban areas into agricultural lands should only occur after the use of underutilized areas within the existing urban limits.

The portions in the Proposed PPS that remove the ability of municipalities to vary from the provincial policy is very concerning. Municipalities in the province vary considerably with regards to size, terrain, lands use, climate, priorities, tax base, staffing and numerous other characteristics. The PPS should be used as a baseline. The removal of flexibility would force the municipalities to make decisions that are not appropriate for their area. Municipalities should be permitted to be more restrictive within the local policy provided it is in accordance with provincial policies.

The agriculture community currently uses Minimum Distance of Separation (MDS) calculations to reduce neighbouring land use complaints. The MDS has ensured that livestock buildings and manure storages are separated from other land use. The utilization of MDS ensures that there is minimal odour concerns. We feel that the MDS should continue to be used and that future development take into consideration MDS and the setback requirements that are necessary.

The HCFA is a supporter of responsible development but certainly not projects that jeopardize the future of sustainable agriculture.

Sincerely,



Murray Workman, President HCFA

Cc Huron Bruce MPP and Minister of Agriculture [lisa.thompsonco@pc.ola.org](mailto:lisa.thompsonco@pc.ola.org)