

**ITEMS OF INFORMATION**  
**COUNCIL AGENDA – June 26, 2023**

<b>Communications</b>	<b>Page</b>
1. Haldimand County Provincial Offences Act Ticket Issuance Statistics	1
2. Resolution from Clearview Re: Declaring Intimate Partner Violence an Epidemic	3
3. Resolution from the Town of Bradford Re: The Right-to-Repair movement	5
4. Correspondence from Western Ontario Wardens Caucus Re: Proposed Provincial Planning Statement	8
5. Correspondence from Western Ontario Wardens Caucus Re: Submission to Environmental Registry of Ontario Posting 019-6813	10

## Haldimand County Provincial Offences Act Ticket Issuance Statistics

Year	2015	2016	2017	2018	2019	2020	2021	2022	2023
JANUARY	279	217	149	151	209	104	157	142	93
FEBRUARY	201	205	184	186	330	81	169	74	197
MARCH	273	248	364	213	283	84	229	173	77
APRIL	566	211	181	295	370	81	371	400	282
MAY	422	202	197	337	262	270	372	266	188
JUNE	398	197	214	271	238	140	160	135	
JULY	567	171	146	345	349	216	269	203	
AUGUST	336	272	203	303	325	122	131	162	
SEPTEMBER	238	173	117	184	298	190	163	155	
OCTOBER	242	258	143	212	236	154	139	212	
NOVEMBER	302	153	164	248	108	113	122	139	
DECEMBER	200	102	127	276	71	160	69	132	
<b>Total</b>	<b>4024</b>	<b>2409</b>	<b>2189</b>	<b>3021</b>	<b>3079</b>	<b>1715</b>	<b>2351</b>	<b>2193</b>	<b>837</b>

The above figures reflect tickets issued in Haldimand County from all sources including Haldimand County By-law Enforcement, the O.P.P., and various provincial ministries. They do not include Part II (Parking) issued offences.

## Comprehensive POA Stats - 2023

Legislation / By-law Reference	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
<b>Summary of Charges Laid by OPP</b>												
Highway Traffic Act (Part I - ticket)	69	121	60	228	163							
Highway Traffic Act (Part III - information)	16	19	11	54	19							
Parking By-laws (Part II)	By-law 307/02											
	By-law 302/02 (snow)											
	By-law 1534-15 Parks											
Discharge Firearms	By-law 41-74											
	By-law 38-74											
	By-law 11-79											
Noise	By-law 1435/14											
Open Air Fires	By-law 1662/16											
EMCPA	7.0.11(2)(a)											
Late Filed Part 1 Tickets	these #'s not included in total											
<b>Total of all Charges Laid</b>	<b>85</b>	<b>140</b>	<b>71</b>	<b>282</b>	<b>182</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
											<b>OPP Total: 760</b>	
<b>Summary of Charges Laid by County Staff</b>												
Discharge Firearms	By-law 41-74											
	By-law 38-74											
	By-law 11-79											
Noise	By-law 1435/14											
Property Standards	By-law 730/06			2								
Ontario Building Code Act, 1992	Section 8(1) No Permit											
	Section 12(2) Fail to Comply to Order											
Open Air Fires	1662/16				1							
Planning Act	562(67)(1)	1										
Haldimand-Norfolk Tree By-law	By-law 15-00				3							
Fire Protection	By-law 28(1)											
Parking By-laws (Part II)	By-law 307/02	18		104	16	132						
	By-law 302/02 (snow)	1		5								
Parks	By-law 1534/15			3	6							
Site Alteration By-law	By-law 1664/16											
<b>Total of all Charges Laid</b>	<b>20</b>	<b>0</b>	<b>114</b>	<b>16</b>	<b>142</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
											<b>Staff Total: 292</b>	
<b>Summary of Charges Laid by Other Enforcement Agencies</b>												
Ministry of Natural Resources and Forestry												
Welland & District Society for the Prevention of Cruelty to Animals (SPCA)	1		4		1							
Ministry of Finance	6											
Ministry of Revenue												
Ministry of Transportation												
Ministry of Environment		57										
Ministry of Labour												
Ministry of Housing												
Ministry of Agriculture, Food & Rural Affairs												
Ontario College of Trades												
Health Protection Act					1							
<b>Total of all Charges Laid</b>	<b>7</b>	<b>57</b>	<b>4</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
											<b>Other Enforcement Agency Total: 70</b>	
<p><b>*Note: Total Charges (Excluding Parking) reflects what is recorded and reported regularly to Council (through the Council Information Package) and PSB for year-by-year historical trends. The historical trends spreadsheet does not capture parking tickets.</b></p>											<b>*Total Charges (Excluding Parking) 837</b>	
											OPP Issued Parking Charges 0	
											Staff Issued Parking Charges 285	
											<b>Total Parking Charges Issued 285</b>	
											<b>Total of All 2022 Charges 1122</b>	



CLEARVIEW

May 31, 2023

C00.2023

Premier of Ontario  
Legislative Building  
Queens Park  
Toronto, ON, M7A 1A4

**Re: Declaring Intimate Partner Violence an Epidemic**

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Please be advised that Council of the Township of Clearview, at its meeting held on May 29, 2023, passed a resolution supporting the correspondence/resolution from Prince Edward County regarding declaring intimate partner violence an epidemic:

Moved by Councillor Broderick, Seconded by Councillor Dineen, Whereas the jury that adjudicated the Carol Culleton, Anastasia Kuzyk and Nathalie Warmerdam Inquest (The Renfrew Inquest) issued 86 recommendations to the Province of Ontario on Intimate Partner Violence; and

Whereas recommendation #1 of the Inquest is for the Province of Ontario to declare Intimate Partner Violence an epidemic; and

Whereas every six days in Canada a woman is killed by her intimate partner, and rural areas see an increased risk of Intimate Partner Violence; and

Whereas this past year in Ontario, 52 women or one every week, were victims of femicide, and in Prince Edward County, 233 domestic violence investigations in 2022 were led by the OPP, and service provision by Alternatives for Women was provided to over 100 women and their children per year in the community; and

Whereas violence against women costs the national justice system, health care systems, social service agencies, and municipalities billions of dollars per year; and municipalities are on the front lines in addressing gender-based violence; and

Whereas the Council of the Corporation of the County of Prince Edward has recognized that issues of violence against women in rural communities are of local importance to the health and wellness of our residents, and has demonstrated this by including it as a pillar in our Community Safety and Well-Being Plan;

Therefore Be It Resolved that the Council of the Corporation of the Township of Clearview recognizes that:



## CLEARVIEW

- the Renfrew Inquest is important to all rural communities;
- Council is committed to engaging with community partners to educate and support our residents about the seriousness and long-term consequences of gender-based violence in our community; and,

That the Council of the Corporation of the Township of Clearview declares, in accordance with Recommendation #1 of the Renfrew Inquest, that Intimate Partner Violence and Violence Against Women are epidemic; and

Be It Further Resolved That this resolution be circulated to all 444 municipalities of Ontario, The Hon. Doug Ford, Premier of Ontario, The Hon. Charmaine A. Williams, Associate Minister of Women's Social and Economic Opportunity, Simcoe Grey MPP, Brian Saunderson, the Association of Municipalities of Ontario and the Federation of Canadian Municipalities. Motion Carried.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Regards,

A handwritten signature in black ink, appearing to read 'Sasha Helmky', with a stylized, cursive flourish at the end.

Sasha Helmky, B.A., Dipl. M.A., AOMC  
Clerk/Director of Legislative Services

cc: All Ontario Municipalities  
The Hon. Charmaine A. Williams  
Brian Saunderson, MPP Simcoe-Grey  
Association of Municipalities of Ontario  
Federation of Canadian Municipalities

*Office of the Mayor*

9 June 2023

VIA EMAIL

Hon. François-Philippe Champagne PC MP  
Minister of Innovation, Science and Economic Development  
Via email: [ministerofisi-ministredeisi@ised-isde.gc.ca](mailto:ministerofisi-ministredeisi@ised-isde.gc.ca)

Hon. Marie-Claude Bibeau PC MP  
Minister of Agriculture  
Via email: [Marie-Claude.Bibeau@parl.gc.ca](mailto:Marie-Claude.Bibeau@parl.gc.ca)

Dear Ministers:

On behalf of the Council of the Town of Bradford West Gwillimbury, we are writing to you pursuant to the enclosed motion to endorse the right-to-repair movement and to call on your government to expedite the promised consultations to enshrine this principle in consumer-protection law, with specific consultations and measures related to supporting the agricultural sector undertaken.

Right to Repair is a simple environmental and consumer protection measure: it ensures consumers are able to reasonably access repairs to electronic and other devices at a fair price, rather than creating a monopoly through technology companies only being able to repair their own products. This measure will also help reduce waste by combatting planned obsolescence, where companies make products that are only intended to last for a period of some years, and are not really repairable.

Further, farmers and growers are intimately familiar with the particular nuances of this issue when it comes to increasingly high-tech agricultural equipment. As the “soup and salad bowl of Canada”, Bradford West Gwillimbury is home to many farmers and growers, so we know firsthand how important an issue these consultations will be.

Our Council has shown in recent years that we are at the forefront of advocating for important environmental protections, including the Freshwater Action Fund, and we are grateful to our new Green Initiatives Committee for recommending this current piece of advocacy to protect the environment and consumers.

A copy of the motion is enclosed. We would be happy to meet with you or your representatives to discuss this further.

Sincerely yours,



James Leduc  
Mayor

CC:           John Barlow, MP Foothills  
              Rick Perkins, MP South Shore—St. Margarets  
              Alistair MacGregor, MP Cowichan—Malahat—Langford  
              Rachel Blaney, MP North Island—Powell River  
              Scot Davidson, MP York—Simcoe  
              Federation of Canadian Municipalities  
              Association of Municipalities of Ontario  
              Ontario's Municipal Councils  
              Ontario's Conservation Authorities



At its Regular meeting of Council held on Tuesday, June 6, 2023, the Town of Bradford West Gwillimbury Council approved the following resolution:

**Resolution: 2023-199**

**Moved: Councillor Verkaik**

**Seconded: Councillor Harper**

Whereas the “right-to-repair” movement seeks to ensure consumers of electronic products, including mobile phones and computers, as well as agricultural equipment, are able to make routine fixes to damaged products without having to rely on the manufacturer and to affordably make such repairs; and

Whereas this movement and efforts against “planned obsolescence” seeks to ensure affordability for consumers and to protect our environment by reducing electronic waste; and

Whereas the agricultural sector has unique needs related to specialized electronic farm equipment and the ability to make repairs in a timely and affordable manner, especially during the growing season; and

Further to a commitment in the 2023 federal budget that “the government will work to implement a right to repair, with the aim of introducing a targeted framework for home appliances and electronics in 2024. The government will launch consultations this summer, including on the right to repair and the interoperability of farming equipment, and work closely with provinces and territories to advance the implementation of a right to repair” (p. 38); and

Be it therefore resolved that the committee recommend Council endorse the right-to-repair movement through a letter from the Mayor and Green Initiatives Committee Chair to call on the federal government to expedite the promised consultations to enshrine this principle in consumer-protection law, with specific consultations and measures related to supporting the agricultural sector undertaken; and

That a copy of this resolution and letter be shared with the Minister of Innovation, Science and Economic Development; the Minister of Agriculture and their critics; and the Member of Parliament for York—Simcoe; and to the Federation of Canadian Municipalities (FCM), the Association of Municipalities of Ontario (AMO) and Ontario’s Municipal Councils, with a request for their endorsement of same.

Result: CARRIED.





Friday, June 16, 2023

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

Delivered via email: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

### **Proposed Provincial Planning Statement**

Dear Minister Clark,

I would like to begin by thanking your Caucus colleagues, Minister Thompson, Speaker Arnott, and Parliamentary Assistant Rae, for speaking with the Western Ontario Wardens' Caucus (WOWC) on May 25 to discuss the proposed Provincial Planning Statement and the impacts on rural communities and agricultural land in Western Ontario.

The WOWC has concerns with respect to the changes that would increase the Province's capacity to intervene in development (i.e. through the use of MZOs), as well as a number of the proposed changes to the Provincial land use planning direction contained in draft of the new Provincial Planning Statement (PPS). The proposed PPS policy areas that are currently of greatest concern to the WOWC are residential lot creation in agricultural areas and the settlement expansion process and related requirements.

We were pleased to learn that the Province has committed to the preservation of agricultural land and clarified that the intention has always been to support farmers, their families and agricultural workers by providing housing options that would let children taking over the farm or retiring parents live close by to assist with succession planning.

Further, we are encouraged that any ambiguity regarding this stated intention will be clarified, eliminated, and resolved, through the elimination of the proposed rural residential lot creation policies and continuing to work with municipalities and the agricultural sector to identify alternatives to assist farm families in succession planning, but that do not involve additional severances.

With the Province's stated commitment to addressing the above noted agricultural policy concerns, it is hoped that Province can now focus its attention on addressing the other key area of concern to the WOWC, which is the proposed changes to the settlement expansion process and related requirements.

Expansion of settlement boundaries without appropriate limitations and justification requirements (i.e., a maximum planning horizon, minimum densities and unit mix, justification of need, etc.), is the next greatest threat to agricultural land and operations in Ontario and will negatively impact the ability of the Province and municipalities to achieve other important planning objectives (e.g. building complete communities, ensuring efficient use of infrastructure and public services, etc.). As such, it will be critical that this proposed policy change also be further reviewed and revised to address these concerns.

To ensure the various concerns identified in this letter are appropriately considered and addressed, the WOWC is hereby offering to work/consult further with the Province to identify potential policy solutions and requesting that the Province release a revised draft of the PPS document that incorporates the feedback received from municipalities through this first round of consultation, for further municipal review and comment, prior to finalizing.

Given the importance of the PPS to planning for complete and sustainable communities, protecting our natural resources, and the future of the Province as a whole, this is both a reasonable request and prudent consultation step.

Please find enclosed our complete submission to the Environmental Registry of Ontario.

Sincerely,

A handwritten signature in black ink that reads "Glen McNeil". The signature is written in a cursive style with a small "c" above the "i" in "McNeil".

Warden Glen McNeil  
Chair, Western Ontario Wardens' Caucus

cc.

The Honourable Doug Ford, Premier of Ontario  
The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs  
The Honourable Ted Arnott, Speaker of the Legislative Assembly  
MPP Matthew Rae, Parliamentary Assistant, Municipal Affairs and Housing  
MPPs of Western Ontario  
Members of the Western Ontario Wardens' Caucus

**Attachment:** WOWC Submission to Environmental Registry of Ontario (ERO) Posting 019-6813

Friday, June 9, 2023

Laurie Scott, MPP, Haliburton—Kawartha Lakes—Brock  
Chair, Standing Committee on Heritage, Infrastructure and Cultural Policy  
c/o Isaiah Thorning, Committee Clerk  
Whitney Block, Room 1405  
99 Wellesley Street West  
Toronto, ON M7A 1A2

Delivered via e-mail to: [schicp@ola.org](mailto:schicp@ola.org)  
Delivered via e-mail to: [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)  
Submitted online to the Environmental Registry of Ontario

**Re: WOWC Submission to Environmental Registry of Ontario (ERO) Posting 019-6813**

Dear Committee Chair Scott and Members of the Committee,

On behalf of the Western Ontario Wardens' Caucus (WOWC), thank you for this opportunity to provide a submission to the Province of Ontario regarding the Environmental Registry of Ontario (ERO) posting 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 WOWC is a not-for-profit organization representing 15 upper and single-tier municipalities and 1.5 million residents across rural Southwestern Ontario, aiming to enhance the prosperity and overall well-being of rural and small urban communities across the region. The WOWC wishes to express its support for the Province's recent efforts and measures toward increasing housing supply throughout Ontario over the next 10 years.

The WOWC reiterates its commitment and support for the efforts to increase the supply of housing and to improve housing affordability in Ontario, and notes that Bill 97 recognizes the importance of the rental housing market and stronger tenant-landlord relationships in making housing more affordable and preventing homelessness.

However, with respect to the changes on the Province's capacity to intervene in development, including the proposed draft of the new Provincial Planning Statement, there are areas of significant concern that WOWC members wish to address. Specifically, the WOWC's concerns can be expressed in three separate categories, being: lot creation in agricultural areas, employment lands, and the expansion of settlement boundaries.

That said, there are also several proposed changes in the new Provincial Planning Statement that are positive and are supported by the WOWC but would require minor revisions and wording adjustments to ensure clarity and avoid potential confusion and uncertainty in implementation.

To ensure the concerns identified in this letter are appropriately considered and addressed, the WOWC requests that the Province release a revised draft of the document that incorporates the feedback received from municipalities through this first round of consultation, for further municipal review and comment prior to finalizing.

Given the importance of the PPS to planning for complete and sustainable communities, protecting our natural resources, and the future of the Province as a whole – coupled with the potentially disastrous impacts of getting it wrong – it should be stressed that this is both a reasonable request and prudent consultation step.

## **Agricultural Policy Changes**

The landscape across rural Western Ontario includes significant swaths of rural and agricultural lands, including prime agricultural areas. The WOWC therefore agrees with comments expressed by our rural municipal members and partners that the protection of Ontario's prime agricultural areas for their long-term agricultural use must be a key objective.

Ontario's agricultural lands are a finite and shrinking resource. The province cannot continue to lose valuable agricultural land – which produces and supplies food, fibre, fuel, among other things – while increasing the housing supply across Ontario. Any proposals to increase housing must be done in careful consideration of the protection of agricultural lands.

The total agricultural land loss that could potentially result from the implementation of the proposed changes to the PPS would have a significant impact on the agricultural industry. Less than five per cent of Ontario's land base is prime agricultural lands (OMAFRA, 2016). According to Ontario Farmland Trust, Ontario is already losing 319 acres of farmland every day, as it is transitioned to other uses.

The WOWC is pleased to see that the Province is proposing to recognize “additional residential units” (ARUs) as a permitted use in rural areas, including on a farm. This change is appreciated and supported, as those units will serve to address and support the needs of farm families and operations with limited impacts on agriculture/agricultural operations.

However, allowing for the severance of such units from a farm is not appropriate or supported, except in the case where they are contained on the same lot as an existing principal farm dwelling that is determined to be surplus to the farm operation in accordance with proposed policy 4.3.3.1 b, i.e. to ensure that the establishment of ARUs on a farm do not inadvertently create any additional rural residential lot creation opportunities and associated negative impacts on agriculture.

The proposal to require municipalities to allow for up to three residential lots to be severed from a farm property is of major concern. This proposed policy demonstrates a lack of perspective, context, foresight, and understanding of land use planning, economics, and agriculture. If approved, this policy would have a significant and irreversible impact on agricultural land and operations and the long-term success and viability of agriculture in Western Ontario and the entire province.

Information shared through the Ontario Farmland Trust also suggests that more than 500,000 residential lots could potentially be severed from agricultural land province wide as result of this one proposed policy change. WOWC estimates more than 270,000 such lots could be created on prime agricultural lands in Western Ontario municipalities alone, and result in the loss of 5 to 10 per cent of our remaining farmland (see Appendix 1).

Even if these lots were all to be limited to a maximum of one acre in size, the same number of lots could easily be accommodated on a fraction (i.e., 1/10th) of the land area in a typical fully serviced settlement. This proposed policy would result in an enormous loss, and extremely inefficient use, of prime agricultural land, without in anyway increasing the supply of affordable and/or attainable housing in rural areas.

Further, there are other ways to increase the supply of rural housing that are more affordable, attainable, and sustainable, without negatively impacting agricultural land and operations. Policies that promote multiple severances and introduce additional non-farm development (with associated increases in potential land use conflicts, increased fragmentation of land, impacts on rural services etc.) are not viewed as promoting the interest of farming or ensuring the sustainability of agricultural for future generations.

Allowing multiple residential severances in the agricultural and rural areas will also increase the amount of hauled sewage that is produced. Hauled sewage still needs to be treated at municipal wastewater treatment plants. There is a concern that existing wastewater treatment plant capacities and treatment capabilities will not be able to handle the increase in hauled sewage.

The WOWC believes strongly in the PPS 2020 agriculture policies governing farmland and rural areas protecting the right to farm and the agricultural system in Ontario and supports the position of the OFA that those policies remain in place, particularly the lot creation policies. The WOWC does not support further rural residential lot creation in agricultural areas but can support additional residential units on existing farm parcels, and in rural settlements, to support our agricultural system. The WOWC reiterates the statement from its partners on support for additional residential units (ARUs) subordinate to the principle dwelling on agricultural parcels but does not support the severance of ARUs from these parcels, except as noted above.

## **Employment Lands**

The WOWC is concerned with changes to the employment use policies that would now appear to require municipalities to allow for certain employment lands (that are currently not defined as an “employment area”) to be developed or redeveloped for mixed use, including residential. In addition, the proposal also appears to introduce new policies that require the identification and protection of “employment areas” for exclusively employment use, based on provincial criteria, as well as for the planning of transition areas surrounding such areas.

The WOWC cautions against the changes to the definition and policies proposed in the *Planning Act*, namely as the resulting impacts of reduced protections for employment lands could result in increased pressure to utilize agricultural lands such as prime agricultural lands and specialty crop areas for employment uses in the future. Further, the proposed changes could unduly limit the ability of municipalities to appropriately properly plan for employment uses and areas, particularly in smaller urban and rural municipalities.

## **Proposed Growth Management and Settlement Expansion Policies**

Another area of concern to the WOWC is the proposed change to the planning horizon and loosening of the required justification for settlement area expansions. For one, the complete removal of the comprehensive review process and definition represents a drastic policy change. Further, having a reasonable maximum time frame for planning for growth (not just a minimum, as proposed) and clear

justification for settlement expansions is necessary to provide certainty and consistency in planning for growth and infrastructure and other public services and achieving the necessary densities and mix of housing and other uses necessary to build complete communities.

Various municipalities, including some WOWC members, have previously requested that the Province consider providing some additional flexibility to facilitate settlement expansions in certain circumstances, where it is reasonably required to properly plan for and accommodate forecasted growth and increase housing supply. However, as proposed, the changes do not provide sufficient direction and certainty to be able to effectively plan for and direct growth, which may also serve to undermine other key provincial and local planning objectives including, but not limited to:

- planning for and ensuring the efficient use of land and infrastructure,
- protecting agricultural land for long term agriculture and limiting impacts on agriculture and other natural resources; and
- encouraging increased densities, intensification, range and mix of housing and other uses necessary to support complete communities.

It is also critical that settlement expansions be either initiated or approved by a municipality, and that a municipal decision to not support a privately initiated application to expand a settlement not be subject to appeal, as has been the approach under the current *Planning Act*. The alternative would lead to more speculation and uncoordinated/inefficient settlement expansions, due to continuous pressure from development proponents to expand settlements and infrastructure in multiple directions. This continuous pressure would distract municipalities from completing the necessary growth and infrastructure planning that is important to sustainably accommodate growth and build great communities.

Therefore, the WOWC requests that the Province modify the proposed settlement expansion policies to address the above noted concerns, while still incorporating some additional flexibility for settlement expansions.

The proposed Provincial Planning Statement would weaken direction on these forms of housing through the removal of affordable housing definitions, affordable housing targets and references to affordable housing in the definition of “housing options.” The Province should be using this opportunity to strengthen these policies to ensure the effective and continuous delivery of these housing units across the Province.

The WOWC is also unable to support amendments to the *Planning Act* that would give the Minister or any other planning authority the ability to make planning decisions which are not consistent with the PPS 2020. On balance, the policies of the PPS 2020 represent the minimum standard in support of protecting the environment, farmland and public health and safety. Furthermore, we recommend strengthening of the PPS 2020 to require fixed urban settlement boundaries and policies requiring mandatory intensification within the existing built urban areas as well as mandatory “greenfield” density requirements to better utilize infrastructure, improve the financial viability of public transit and protect our prime agricultural lands from sprawl.

The WOWC does not support the *Planning Act* amendment specified in Schedule 6 of Bill 97 to give the Minister the ability to issue MZOs that are not consistent with policy statements, provincial plans and official plans. This would allow for planning decisions that are inconsistent with the PPS 2020 and could open the floodgates for a rash of developments that run counter to prime agricultural land preservation. Significant acres of farmland have already been lost to development because of MZOs to date.



## Conclusion

The WOWC stresses that the rural residential lot creation and settlement expansion policies are currently the primary focus of concern.

It is important to highlight that even allowing for one rural residential lot per farm would have a devastating and irreversible impact on farmland loss and agricultural operations for the same reasons three lots would – and simply does not have any planning, or agricultural or housing need basis. There are far better ways to increase rural housing supply that would be more affordable/attainable and not negatively impact agriculture.

The WOWC is firmly of the opinion that the following alternatives would allow for increased rural housing opportunities in prime agricultural areas, while also avoiding or minimizing the impacts to agricultural land and uses:

- Allowing for ARUs in rural areas, including on farms, as the Province is proposing;
- Continuing to direct rural growth primarily to fully serviced rural settlement areas;
- Allowing for existing, smaller (e.g. <2.5 acres) non-farm rural residential lots to be split; and
- Allowing for the limited infilling or the one-time minor rounding out of un-serviced rural settlement by municipalities through an Official Plan review process.

With respect to the proposed changes to the settlement expansion policies, the WOWC would request an opportunity to work/consult further with the Province to identify potential policy solutions to address the various concerns raised.

As always, the WOWC appreciates the opportunity to comment on the proposed policy changes and looks forward to working with the provincial government and our municipal counterparts to protect Western Ontario's agricultural land while sustaining and growing Ontario's housing supply.

Thank you in advance for your collaboration and your attention to this matter. On behalf of the WOWC and its constituents, I look forward to your response.

Sincerely,



Warden Glen McNeil  
Chair, Western Ontario Wardens' Caucus

## Appendix 1: Summary of WOWC Municipalities

### Assumptions and Notes

Includes severance estimates for three lots per agricultural lot/parcel for all WOWC municipalities (Brant, Bruce, Chatham-Kent, Dufferin, Elgin, Essex, Grey, Haldimand, Huron, Lambton, Middlesex, Norfolk, Oxford, Perth, Simcoe, Wellington).

Based on municipal supplied severance estimates, except for Elgin, Dufferin, Haldimand and Simcoe where MPAC (2019) based estimates were used, as local data was not available at the time of summary.

Estimates have generally been reduced to account for non-agricultural/non-farm uses (10%) and MDS (10%) referenced in the proposed provincial criteria. Accuracy of municipal numbers will vary based on level of detail for local information and their respective designation and zoning approaches.

Severance estimates are for creation of rural residential lots in prime agricultural areas only and do not consider potential farmland loss that could result from the proposed increased flexibility for lot creation within rural lands (i.e. multi-lot development/subdivisions), or as a result of settlement area expansion or other types of nonagricultural development.

Estimates for farmland loss is based on total farmland for all WOWC municipalities based on MPAC 2021 (not just farmland located within prime agricultural areas). As a result, the percentage of prime agricultural farmland loss from this proposed policy change would be even higher. It is reasonable to say that this proposed policy could result in a loss of 5 to 10% of Ontario's prime agricultural land.

<b>Total Estimated Severance Potential</b>	272,503 acres
<b>Total Acres Lost</b> (1 acres/ha) (2 acres/ha) (2.47 acres/ 1ha)	272,503 acres / 110,325 ha
	545,007 acres / 220,651 ha
	673,084 acres / 272,503 ha
<b>Estimated Farmland Loss %</b> (1 acre lots) (2 acre lots) (2.47 acres/ 1 ha lots)	3.46%
	6.92%
	8.54%
<b>Potential Net Units in a serviced settlement**</b> (if 1 acre lots) (2 acre lots) (if 2.47 acre lots)	1,556,200 units
	3,112,399 units
	3,843,813 units

\*\* Is based on 15 units/ha at 70% developable