

PLANNING REPORT 2022-17 APPENDIX

TWO - AGENCY COMMENTS



To: Heather James

Attn: Municipality of West Elgin Council

Re: Elgin Federation of Agriculture (EFA) Public Comments regarding Zoning Amendment File D14-08-2022

The Elgin Federation of Agriculture (EFA) represents the Ontario Federation of Agriculture (OFA) in Elgin County. We support our members and the agri-food industry to ensure our rural communities are consulting and considering legislation that impacts the sustainability of farm business operations in Elgin County.

The EFA opposes the proposed zoning application and the creation of new residential lots in an agricultural area. Creating lots leads to farm fragmentation and loss of farmland. Five percent of Ontario's land base is suitable for agriculture. Municipalities must continue to prioritize agricultural land, maintaining large, continuous tracks of agricultural land.

Canada's 2021 census of agriculture counted 189,874 farms, a moderate decrease of 1.9% from 2016. Farms in Canada reported a 3.2% decrease in total farm area from 2016 to 92.9 million acres in 2021. **OMAFRA's** data collected from the **2016 Census of Agriculture**, from 1996 to 2016, Ontario lost 1.5 million acres of farmland to development, at a daily rate of loss of 175 acres per day

The Provincial Policy Statement (PPS) offers limited options for lot creation in prime agricultural areas. New residential lot creation was removed from the **PPS** in 2005. The **Provincial Policy Statement 2020 section 2.3.4.1 (a-d)** discourages the creation of lots in prime agricultural areas and may only be permitted for:

Lot creation in prime agricultural areas is discouraged and may only be permitted for: a) agricultural uses, provided that the lots are of a size appropriate for the type of agricultural use(s) common in the area and are sufficiently large to maintain flexibility for future changes in the type or size of agricultural operations; b) agriculture-related uses, provided that any new lot will be limited to a minimum size needed to accommodate the use and appropriate sewage and water services; c) a residence surplus to a farming operation as a result of farm consolidation, provided that: 1. the new lot will be limited to a minimum size needed to accommodate the use and appropriate sewage and water services; and 2. the planning authority ensures that new residential dwellings are prohibited on any remnant parcel of farmland created by the severance. The approach used to ensure that no new residential dwellings are permitted on the remnant parcel may be recommended by the Province, or based on municipal approaches which achieve the same objective; and d) infrastructure, where the facility or corridor cannot be accommodated through the use of easements or rights-of-way

PPS (2020) section 2.3.4.3 prohibits the creation of new residential lots in prime agricultural areas shall not be permitted, except in accordance with policy 2.3.4.1(c).

Planning act RSO1990 Part I 2 (b) legislates Municipal Councils to protect agriculture resources.

(b) the protection of the agricultural resources of the Province.

The **County of Elgin Official Plan (2015) section E.12.3** further excludes consent for lot creation.

The approval of consents to sever land in Elgin County shall be in conformity with the relevant policies contained in this Plan, policies contained in local Official Plans, and the provisions of the Planning Act. Under no circumstances shall consent be granted for approval that is contrary to the policies of this Plan or the local Official Plan.

Allowing lot creation in prime agricultural areas creates poor planning and scattered development. The proposed rezoning would effectively sterilize important farmland, create conflicts later, and introduce long-term incompatible land uses. Ontario Agriculture works best when there are no constraints from neighbouring non-agriculture uses.

We recognize the benefit of having additional housing opportunities to provide additional support for family-owned farms; however, farm operations do not need lot creation to achieve this goal. We have existing tools to add more housing on existing farm parcels without the need to sever lots down the line; we note **section 39.1 of the Planning Act** authorizes the temporary use of a "garden suite" as an example. Additionally, the **More Homes, More Choice Act, 2019** removed barriers for Municipalities to permit a wide array of additional residential units in their Official Plans and Zoning Bylaws.

Prime Agriculture lands are not an unlimited resource; we cannot sustain continuing losses of agricultural land and still meet the ability to produce food, fibre, and fuel. The EFA favours the use of the many existing policies available for Municipalities to address dwellings on farm properties that do not interfere with agricultural operations.

Regards,

Elgin Federation of Agriculture Land Use Committee

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