

## **Provincial Comments Received**

The draft Agricultural systems and related policies were circulated to the Province in October 2025; this attachment provides the comments received by the Provincial Ministries in the Table below. All comments have been integrated into the policies and changes proposed under this Official Plan Amendment.

Suggested Revisions to Draft Official Plan Amendment – to Implement the Planning Act and Provincial Planning Statement, 2024

OPA Policy Number	Comments / Concerns	Related Provincial Ministries	Reference to Planning Act, PPS or Provincial Plan Section or Policy	Proposed Revision
Entire OP	The County is encouraged to replace specific ministry names.	MMAH	Administrative	Replace any specific ministry names (e.g., “Ministry of Municipal Affairs and Housing,” “Ministry of Infrastructure”) with <b>“the Province”</b> .
Entire OP	The County should replace any reference to the “Provincial Policy Statement”.	MMAH	Administrative	Replace all references to the “Provincial Policy Statement” with <b>“Provincial Planning Statement”</b> or <b>“Provincial Policy”</b> .
Entire OP	To be consistent with the Provincial Planning Statement, 2024 (PPS), it is recommended that the County revise the draft OPA to change references to Municipal Comprehensive review.	MMAH	PPS/ Administrative	The County is encouraged to replaces all references to a “municipal comprehensive review” with a <b>“land needs assessment”</b> or <b>similar wording</b> .
Part 5- 2.0 Protecting what we value 1.1Agricultural Systems Policy 2.06	It is recommended that the County revise the draft OPA policy to be consistent with the policies in the PPS.	MMAH	PPS 2.3.2	The County is encouraged to update the policy so that it reads:  Redesignation of lands within the Agriculture or Countryside designations will <b>generally</b> not be permitted for the duration of this Plan, <b>unless in compliance with provincial policy and/or legislation</b> . This includes <del>redesignation as part of a settlement area boundary expansion or to create a new</del>

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				<del>settlement area, since based on the M.C.R. the County has sufficient lands to accommodate growth within settlement areas until 2051.</del>
Part 5- 2.3 Consent in Prime Agricultural Area- Lot Configuration	<p>The Nutrient Management Act, 2002 (NMA) and its associated regulations regulate how nutrients (like manure, biosolids, and fertilizers) are stored, handled, and applied to land.</p> <p>Ontario Regulation 267/03 specifies setback distances from municipal and other wells and restricts manure and fertilizer application where groundwater is less than 0.9 metres below ground surface.</p> <p>Depending on the locations of pre-existing wells and depth to water table, some agricultural practices may be incompatible with some rural areas.</p>	MECP	PPS 4.3 Agriculture	The OP should be amended to expand the evaluations to include distances to pre-existing wells and water table depth where agricultural activities might include manure, biosolids or fertilizer storage, handling, and land application.
Part 5- 2.0 Protecting	It is recommended that the County revise the draft OPA	MMAH	PPS 2.3.2	The County is encouraged to update the policy so that it reads:

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<p>what we value 1.1Agricultural Systems Policy 2.06</p>	<p>policy to be consistent with the policies in the PPS.</p>			<p>Redesignation of lands within the Agriculture or Countryside designations will <b>generally</b> not be permitted for the duration of this Plan, <b>unless in compliance with provincial policy and/or legislation.</b> <del>This includes redesignation as part of a settlement area boundary expansion or to create a new settlement area, since based on the M.C.R. the County has sufficient lands to accommodate growth within settlement areas until 2051.</del></p>
<p>Part 5- 2.3 Consent in Prime Agricultural Area- Lot Configuration</p>	<p>The Nutrient Management Act, 2002 (NMA) and its associated regulations regulate how nutrients (like manure, biosolids, and fertilizers) are stored, handled, and applied to land.</p> <p>Ontario Regulation 267/03 specifies setback distances from municipal and other wells and restricts manure and fertilizer application where groundwater is less than 0.9 metres below ground surface.</p> <p>Depending on the locations of pre-existing wells and depth to water table, some agricultural</p>	<p>MECP</p>	<p>PPS 4.3 Agriculture</p>	<p>The OP should be amended to expand the evaluations to include distances to pre-existing wells and water table depth where agricultural activities might include manure, biosolids or fertilizer storage, handling, and land application.</p>

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	practices may be incompatible with some rural areas.			
Part 5- 2.3.2	It is recommended that Policy 2.3.2 be removed to avoid confusion and ensure consistency with the PPS for legal and technical adjustments in Prime Agricultural Areas.	OMAFA/MM AH	PPS 4.3.3.2.	It is recommended that the following policy be removed: <del>2.3.2 Severing two or more lots that unintentionally merged in title is permitted, provided no adjustment is made to the initial lot configuration, and it shall be considered a correction of deed. Proof of the unintentional merger shall be demonstrated through appropriate land registry documentation, accompanied by legal confirmation that prior to merger the lot existed on title as separate deeded parcels.</del>
Part 5- 2.3.5	Section 2.3.5(c) requires that lands be acquired by a “bona fide farming operator.” This terminology may subjective if not defined.  Consider aligning the terminology with definitions found in the PPS by referencing a “farmer engaged in an agricultural use”	OMAFA	PPS Definitions	The County is encouraged to update the policy so that it reads:  2.3.5 Consent for the purposes of a residence surplus to an agricultural operation will only be supported as a lot adjustment, where the remnant parcel of farmland will be merged with an abutting farm parcel under one ownership, and where:  .... c) The lands have been acquired by “ <b>a farmer engaging in ongoing agricultural</b> ”

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				<p><del>use</del> a <del>bona fide farming operator</del> prior to the application or are subject to a binding agreement of purchase and sale of which a <b>“farmer is engaged in an ongoing agricultural use”</b> <del>bona fide farming operator</del> is a party.</p>
Part 5- 2.3.5	<p>Section 2.3.5(a) refers to a minimum size as a “farmable area.” Consider defining “farmable area” (e.g., excluding natural heritage features or hazard lands), or referencing total lot area for clarity.</p>	OMAFA	PPS 4.3.3	<p>It is recommended that the county consider defining “farmable area” (e.g., excluding natural heritage features or hazard lands), or referencing total lot area for clarifying reaction 2.3.5 a)</p>
Part 5- 2.7 Minimum Distance Separation Formulae	<p>MDS Guidelines do not require all livestock facilities and anaerobic digesters (ADs) within the surrounding area to be mapped or have MDS setbacks calculated.</p> <p>The Guidelines apply only to those facilities that are reasonably expected by an approval authority to be impacted by the proposed application.</p>	OMAFA	PPS 2.6, 4.3.2 Publication 851, The Minimum Distance Separation (MDS) Document	<p>The County is encouraged to consider incorporating flexibility into policy 2.7, such as a screening to identify which barns or facilities may require further analysis.</p>

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Part 5 -2.7 Minimum Distance Separation	Recommend considering sub policy point c) of 2.7.1 to provide some discretion around this aspect of MDS implementation. Examining livestock facilities at this distance may only apply in limited circumstances, such as where a very large Type B livestock facility is located near the outer edge of the standard 1,500 m study area.	OMAFA	The Minimum Distance Separation (MDS) Document	<p>It is recommended that subpoint c) of the below policy be expanded to provide some direction around this aspect of MDS implementation:</p> <p>“2.7.1 In accordance with Guideline #6 where an application for development on lands within the agricultural system requires Minimum Distance Separation (MDS) calculation to be undertaken, applicants must identify and map all existing livestock facilities and anaerobic digesters within a study area extending:</p> <ul style="list-style-type: none"> <li>a) a minimum 750 metre distance from any proposed Type A land use,</li> <li>b) a minimum 1,500 metre distance of a proposed Type B Land use, and</li> <li>c) a minimum 2,500 metre distance where a large facility of over 1,200 nutrient units is present”</li> </ul>
Part 5- 2.7.4	The Nutrient Management Act does not regulate or otherwise address odour from land application. It is environmental (e.g., water) management legislation, not a land use compatibility tool. As such, it is	OMAFA	Nutrient Management Act, Publication 851, The Minimum Distance	<p>The County is encouraged to update the policy so that it reads:</p> <p>2.7.4 MDS applies only to odour generated from <b>permanent</b> livestock facilities and anaerobic digestors. <del>They do</del> <b>MDS does</b> not apply to odour from manure or digestate</p>

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	suggested to modify the language of this section.		Separation (MDS) Document	application, which are regulated through a nutrient management plan.