

October 21, 2019

Planning Consultation  
Provincial Planning Policy Branch  
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Toronto, ON  
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To Whom It May Concern;

**RE: Environmental Registry of Ontario (ERO) number 019-0279 Provincial Policy Statement Review – Proposed Policies**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Summary of OFA's key recommendations;

- that OFA categorically opposes any reintroduction of farm retirement lots in Ontario's prime agricultural areas (page 7)
- that the PPS require fixed urban boundaries for 25-years, and include policies requiring mandatory intensification within the existing built urban boundary 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 (page 3)
- that policy 1.1.3.8(d) retains reference to compliance with the minimum distance separation formulae (page 3)
- that OMAFRA's "Guidance Document for Agricultural Impact Assessments" be finalized, adopted and specifically cited in the PPS (page 3)
- that the province uses of a range of buffer forms, located on the urban side of the settlement boundary, to better separate urban uses from agricultural uses (page 4)
- that language be added to policy 1.6.6.7 to require stormwater management ponds be used to separate urban development from adjacent agricultural and rural uses (page 4)
- that municipalities ground truth the presence and boundaries of natural heritage features and areas before including them in the municipality's Official Plan and Zoning By-laws and that municipalities notify each property owner in writing of the identification of a natural heritage feature on their property as well as their appeal options (page 5)
- that use of the agricultural system and the agri-food network be mandatory (page 6)
- that the reference to MDS be restored to Policy 2.3.6.1 (page 6)
- that OMAFRA's AIA guidelines be formally recognized in the draft 2019 PPS, and through potential revisions to Ontario's environmental assessment process (page 6)
- that policy 3.2.3 be relocated to section 1.1.3 (Settlement Areas) (page 6)

- that policies be added to section 1.0 of the PPS to encourage broader use of garden suites (page 7)
- that the PPS definition of “prime agricultural land” be rewritten to include specialty crop areas and/or Canada Land Inventory Class 1, 2, 3 or **4** lands or in Northern Ontario, the highest two soils classes in the district or region, and that updates of Ontario’s soils maps must continue to completion (page 8)
- that PPS guidance materials be listed in the PPS (page 9)
- that municipalities be mandated to update their Zoning By-laws, and that the province financially assist municipalities to achieve this (page 9)

Land use planning policies have been, and continue to be, a core issue for OFA and Ontario farmers. The protection of Ontario’s agricultural lands from incompatible development, as well as its loss from urban expansion, continues to be an ongoing concern. Recent reports, such as the Royal Bank’s “Farmer 4.0” and the Canadian Government’s “Advisory Council on Economic Growth” highlight the potential for Canada and Ontario to benefit from rising global demands for safe, affordable food products. But without strong commitments and policy direction for agricultural land protection from our governments, those opportunities will be lost.

Based on the 2016 Census, Ontario farms encompassed 12.3 million acres or about 5% of Ontario’s overall land area. Comparing the 2011 and 2016 censuses shows a decline in the area of farms from 12.6 million acres in 2011 to 12.3 million acres in 2016. The loss of almost 320,000 acres over 5 years equates to 63,940 acres every year or 175 acres every day. Ontario cannot sustain continuing losses of agricultural land while still maintaining our ability to produce food, fibre and fuel from a limited and declining agricultural land base. The OFA firmly believes that the preservation of our productive agricultural lands for their ability to produce food, fibre and fuel is in Ontario’s long-term environmental and economic interest.

OFA has a longstanding commitment to wise land use planning that protects Ontario’s agricultural lands, the finite and shrinking resource that underpins Ontario agriculture’s contributions to our economic growth and well-being. Based on the latest data from the Ministry of Agriculture, Food and Rural Affairs, Ontario’s agri-food GDP was \$47.7 Billion, and the agri-food sector supported 837,064 jobs in 2018; the largest sector of Ontario’s economy.

To maintain the economic and employment contribution of the agri-food sector into the future, Ontario’s land use planning policies must to retain and reserve large, contiguous tracts of farmland for farming and distribute population and employment growth to urban settlement areas throughout Ontario. Focussing the majority of Ontario’s future population and employment growth into the Growth Plan for the Greater Golden Horseshoe area is short sighted.

**1. Do the proposed policies effectively support goals related to increasing housing supply, creating and maintain jobs, and red tape reductions while continuing to protect the environment, farmland, and public health and safety?**

On balance, the policies proposed through this review of the PPS do support protecting the environment, farmland and public health and safety.

Policy 1.1.2 on page 9 proposes to increase the planning horizon from 20 years to 25 years. OFA views this as positive, but one that does not go far enough in protecting the environment, farmland and public health and safety. We further recommend that the PPS require fixed urban settlement boundaries for the duration of the 25-year period, and the PPS should adopt policies requiring mandatory intensification within the existing built urban boundary as well as mandatory

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“greenfield” density requirements to better utilize infrastructure, improve the financial viability of public transit and protect our prime agricultural lands from sprawl.

Policy 1.1.3.6 (Settlement Areas) on page 10 changes “shall” to “should”. This policy speaks to new development in a designated urban growth area. Changing “shall” to “should” softens the policy direction in terms of “compact urban form, mixed uses and densities that currently facilitate the efficient use of land”. OFA opposes this change. OFA recommends that “shall” be restored to Policy 1.1.3.6.

Policy 1.1.3.7 (Settlement Areas) on page 11 changes “shall” to “should”. This policy speaks to phasing policies for new developments. As with 1.1.3.6, this change softens the policy direction; a change OFA opposes too. OFA recommends that “shall” be restored to Policy 1.1.3.7.

Policy 1.1.3.8 c, d and e (settlement expansions into prime agricultural areas) proposes no changes to (c) and (d). The wording added to 1.1.3.8 (e) is an improvement over the 2014 PPS. The current PPS speaks to mitigating the impacts of settlement expansions “to the extent possible”. The 2019 wording adds “avoided, and where avoidance is not possible, impacts are minimized and mitigated ...” in accordance with provincial guidelines. Policy 1.1.3.8(d) also retains reference to compliance with the minimum distance separation formulae. OFA endorses these changes.

1.1.3.8 (e) also speaks to “provincial guidelines”. In 2018, the province consulted on a “Guidance Document for Agricultural Impact Assessments”. The Coordinated Review adopted policies that specifically reference agricultural impact assessments (five in Growth Plan and eight in Greenbelt Plan) and required their use. OFA recommends that the “Guidance Document for Agricultural Impact Assessments” be finalized, adopted and specifically cited in the PPS.

Policy 1.1.3.9 on page 12 is new. This policy speaks to settlement boundary “adjustments” where there is no net increase in the settlement’s overall area. The “no net increase” in settlement area is key. Policy 1.1.3.9 should facilitate more intensification within settlement areas, where it should go first. The potential impacts on prime agricultural areas are addressed in 1.1.3.8 and through the requirement that added lands are appropriately serviced. Policy 1.1.3.9 does acknowledge “prime agricultural areas”. OFA supports this change.

Policy 1.2.6 (Land Use Compatibility) on page 16 has been expanded. In Policy 1.2.6.1, “should” has been changed to “shall”, and Policy 1.2.6.2 is new. Overall, OFA views the impact of these revisions as positive. OFA supports the 2019 revisions and additions to Policy 1.2.6.

Policy 1.3.2.7 on page 18 proposes to extend the planning horizon for Employment Areas from 20 years to 25 years. Extending the planning horizon, in this instance for employment lands, should be positive. A longer planning horizon should reduce the instances for settlement boundary expansions, which should retain more prime agricultural land for longer for agricultural uses. OFA supports this change. We further recommend that in conjunction with extending the planning horizon for Employment Areas from 20 years to 25 years, that the province implement fixed urban settlement boundaries for the full 25 years as well as mandatory intensification within the built boundary and mandatory density requirements for new “greenfield” development.

Lastly about settlement expansions into prime agricultural areas, the province should consider a suite of options to minimize or mitigate the impacts of a settlement expansion on the abutting farm operations. Buffering to better separate the urban uses from the agricultural uses, to avoid complaints over agricultural odours, noises, dusts, etc. arising from normal farm practices, should be required. Buffering could take the form of roads, vegetated buffers or parklands. OFA

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recommends that the province explore the use of a range of buffer forms, located on the urban side of the settlement boundary, to better separate the urban uses from the agricultural uses.

Policy 1.4.1 (Housing) on page 19 extends the planning horizon for housing from 10 years to 12 years. As with our previous comments, a longer planning horizon should reduce the instances of settlement expansions, which should retain more prime agricultural lands for longer for agricultural uses. OFA supports this change.

Policies 1.6.6.1 through 1.6.6.6 speak to Sewage, Water and Stormwater. Policy 1.6.6.1(a)2 adds “feasible” for use of private sewage and water services, with no direction on what constitutes “feasible”. Is it based on technical feasibility, economic feasibility or something else? This must be clarified. In Policy 1.6.6.2, what criteria are to be used by a municipality in applying the servicing hierarchy (firstly municipal services, secondly private communal services and lastly individual services). This too requires further clarification to be effective.

Policy 1.6.6.4 on page 22 drops “only” in relation to infilling and minor rounding out in settlement areas. This change could facilitate more development on individual wells and septic systems in settlement areas, beyond infilling and minor rounding. For quite some time, provincial planning policy has actively discouraged new development on individual wells and septic systems in settlement areas. In settlement areas, individual wells and septic systems are a poor servicing solution. OFA is categorically opposed to this change.

The second paragraph in 1.6.6.4 is new and speaks to a municipality assessing the long-term impacts of private wells and septic systems on the “environmental health and character” of a rural settlement area. OFA sees this change as positive, and one that we support.

Paragraph 2 of Policy 1.6.6.5 on page 23 speaks to partial services that have been provided to address failed services is new. The paragraph limits the use of partial services only to address failed private wells and septic systems. OFA supports this change.

Policy 1.6.6.7 on stormwater management omits direction that stormwater management ponds be situated to separate urban development from adjacent agricultural and rural uses, to further help reduce complaints over “normal farm practices” as well as incidents of trespass on adjacent agricultural and rural lands. OFA recommends that language be added to policy 1.6.6.7 to require stormwater management ponds be situated to separate urban development from adjacent agricultural and rural uses. Furthermore, green infrastructure, as defined in the PPS, should be more broadly used in new developments, and, where feasible, retrofitted into existing development.

Policy 1.6.7.2 (Transportation Systems) on page 24 changes “shall” to “should”, in relation to existing and planned transportation infrastructure. Transportation infrastructure is costly, and its extension should be as efficient as possible. The proposed wording weakens 1.6.7.2 and must be reversed. OFA opposes this wording change and recommends “shall” be restored to policy 1.6.7.2.

Policy 1.6.7.5 from the 2014 PPS (transportation and land use considerations shall be integrated at all stages of the planning process) has been dropped. Transportation planning and land use considerations are woven together. The two should never be considered separately. Economic growth and job creation require smart transportation planning with consideration of adjacent compatible and incompatible land uses. OFA opposes this change, and strongly recommends policy 1.6.7.5 from the 2014 PPS be retained.

OFA supports the identification and protection of natural heritage features. However, all too often they are “mapped” solely through air photos. While air photos serve as a valuable first step, they must never be relied upon as the only determining factor in where a specific natural heritage feature occurs on the landscape, and its boundaries too. **Ground truthing** the location and boundaries of natural heritage features and areas **must** be the mandatory next step in the process, **before** proceeding to the feature’s inclusion in a municipal Official Plan and Zoning By-laws. OFA demands that municipalities be required to ground truth the presence and boundaries of natural heritage features and areas **before** beginning the process of including them in the municipality’s Official Plan and Zoning By-laws. Furthermore, municipalities **must** be required to formally notify each property owner in writing of the identification of a potential natural heritage feature or area on their property as well as identifying their appeal options. To accomplish this, the province **must** provide the funding necessary to ground truth natural heritage features and to update mapping. Lastly, the provincial government **must** develop a no-cost appeal mechanism for property owners who believe that the heritage feature or area “identified” on their property does not exist or does not exist to the extent proposed.

The sole change in Section 2.1 is the addition of policy 2.1.10 (page 29) which speaks to wetlands **not** subject to 2.1.4 (no development and site alteration in significant wetlands) and 2.1.5 (development and site alteration with no negative impacts on significant wetlands in the Shield, significant woodlands, significant valleylands, significant wildlife habitat, significant ANSIs, and coastal wetlands not subject to 2.1.4(b)). Policy 2.1.10 is discretionary; municipalities “may” manage these wetlands in accordance with provincial guidelines. Policy 2.1.9 remains unchanged, which from OFA’s perspective is positive. Some may see 2.1.10 as expanding the scope of wetland protection. OFA has endorsed the protection of wetlands in recognition of their contributions to flood mitigation, groundwater recharge, etc. As such, OFA supports policy 2.1.10, provided that our recommendations on ground-truthing and landowner notification are applied here too.

## **2. Do the proposed policies strike the right balance? Why or why not?**

Policy 1.1.5.2 (permitted uses on rural lands) on page 13 contains language that was in 1.1.5.8 (2014 PPS) speaking to agricultural uses, agriculture-related uses and on-farm diversified uses, which we see as an improvement. OFA supports this change, and asks that the paragraph “agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices should be promoted and protected in accordance with provincial standards” be reformatted as item ‘g’ in the list.

The 2<sup>nd</sup> paragraph in policy 2.3.2 on page 31 is new. It speaks to the use of the agricultural system and the agri-food network. The 2019 draft PPS also includes new definitions for these terms. OFA has long been an advocate of the adoption of an agricultural systems approach to land use planning, along with the recognition of the role of the agri-food network. OFA applauds the government for including this language and defining the two terms in the 2019 draft PPS. We firmly believe that their inclusion improves the prospects for enhanced protection of agricultural lands, and the agri-food assets and infrastructure that primary agricultural production relies upon. However, the language in this section uses “encouraged” rather than “shall”. There is no benefit from developing policy addressing the agricultural system and the agri-food network if its application is discretionary rather than mandatory. OFA demands that application of the agricultural system and the agri-food network be mandatory.

Policy 2.3.6.1 on page 32 drops the reference to use of the minimum distance separation formulae (MDS) in relation to non-residential uses in prime agricultural areas. Inserting certain types of “more sensitive” land uses with more intense usage, such as soccer fields, baseball diamonds,



golf courses, etc. result in a larger separation distance from proposed new livestock barns or manure storages, or even the expansion of existing barns or manure storages. Restoring the reference to MDS in Policy 2.3.6.1 serves to reinforce the importance of its use in relation to non-agricultural uses in prime agricultural areas. OFA requests that the reference to MDS be restored to Policy 2.3.6.1.

Policy 2.3.6.2 on page 33 contains expanded language on mitigating the impacts of non-agricultural uses on surrounding farm operations, specifically that the impacts be “avoided, and where avoidance is not possible, minimized and mitigated to the extent feasible and informed by provincial guidelines”. The language here is often referred to as the “mitigation hierarchy”, avoid first, minimize second and mitigate as a last resort. This is a positive improvement. Policy 2.3.6.2 concludes with the phrase, “and informed by provincial guidelines”. From OFA’s perspective, this reads as a reference to OMAFRA’s Agricultural Impact Assessment (AIA) guidelines. We hope this assumption is correct. If so, this too is positive. OFA supports these improvements but emphasize that AIAs provide a balance to the interests of competing land uses through the Environmental Assessment process. OFA recommends that OMAFRA’s AIA guidelines be formally recognized in the draft 2019 PPS, and through potential revisions to Ontario’s environmental assessment process.

Policy 3.1.5 on page 39 prohibits certain developments (e.g. hospitals, long-term care homes, retirement homes, pre-schools, school nurseries, day cares and schools) in hazardous lands and hazardous sites. While OFA does not question this prohibition, we do question the rationale for entertaining any form of development on hazardous lands and hazardous sites? “Hazardous lands” are described as lands unsafe for development due to natural processes; flooding hazards, erosion hazards, unstable soils or unstable bedrock.” In recognition of the inherent risks in developments on hazardous lands and hazardous sites, OFA recommends an outright, blanket prohibition on all development, intensification and redevelopment on hazardous lands and hazardous sites.

Policy 3.2.3 on page 39 is a new policy, speaking to excess soil reuse. OFA has supported the efforts of successive governments to develop provincial policies and oversight mechanisms for the environmentally responsible and economically beneficial reuse of excess soil. Our most recent submission on excess soil reuse was in May of 2019. OFA believes including language on excess soil reuse is positive, and we thank the province for including it in the 2019 draft PPS. Our sole comment is, “Is this the best place for it?”. In terms of its location, OFA recommends that section 1.1.3 (Settlement Areas) would be more appropriate from the perspective that growth and development in settlement areas generates excess soil, and including it here places this requirement directly in front of municipal planners, developers, etc.

### **3. How do these policies take into consideration the views of Ontario communities?**

It has been brought to our attention that the province is considering allowing “farm retirement lots” in prime agricultural areas. Policies permitting these lots were **removed** from the PPS in 2005; a change that OFA applauded. Going backward and allowing the creation of farm retirement lots constitutes bad planning policy. Farm retirement lots will increase servicing costs to the municipality for this scattered development. They ignore municipal obligations to maintain a 20-year supply of land available for development, policy 1.1.2, which the current consultation proposes to increase to 25 years. Inserting non-agricultural uses in general, and particularly non-agricultural residential uses into a prime agricultural area is detrimental to the surrounding agricultural producers. Non-agricultural land uses tend to bring increased complaints over agricultural odours, noises, dusts, etc. arising from normal farm practices. In addition, permitting a 1-acre non-agricultural land use to locate within a larger agricultural area effectively limits the

ability of the surrounding livestock farm to expand, due to minimum distance separation (MDS) constraints. Any claims that farm retirement lots are needed to facilitate municipal growth are utterly false. Residential lots in our agricultural areas negatively impact surrounding farm operations through MDS implications, plus odour, noise, dust complaints. It is calculated that a single 1-acre residential lot in an agricultural area sterilizes the surrounding 250 acres from new or expanded livestock barns or manure storages. Given agriculture's role as the leading economic sector in Ontario, hindering it through farm retirement lots is counterproductive. Lastly, past experience with farm retirement lots showed that they remained in the hands of the person/couple that they were created for, for an average of 2½ to 3 years, after which they were sold. To put it bluntly, OFA categorically opposes any additional residential lot creation options for Ontario's agricultural areas and recommends that any consideration of farm retirement lots in prime agricultural areas be permanently dropped.

We note that although section 39.1 of the Planning Act does authorize the temporary use of a "garden suite", the PPS is silent on this. In agricultural areas, garden suites could serve as an alternative to the creation of a farm retirement lot, and the numerous negatives associated with them. OFA recommends that policies be added to section 1.0 of the PPS (Building Strong Healthy Communities) to encourage broader use of garden suites through broader awareness of section 39.1 of the Planning Act.

Focussing on the 2019 draft PPS, OFA appreciates the provincial government for keeping the lot creation policies (2.3.4) unchanged. OFA strongly supports reserving large, contiguous blocks of prime agricultural land solely for agricultural uses, agriculture-related uses and on-farm diversified uses. Ontario agriculture works best when it is not burdened with unnecessary constraints from neighbouring non-agricultural uses. Why insert non-agricultural uses into an agricultural area? From a land use planning perspective, Ontario does not insert residential uses into industrial zones, nor industrial uses into residential areas. Why then do we continue to burden farmers by inserting non-agricultural uses into our agricultural areas? We know there were voices arguing in favour of expanded lot creation into our agricultural areas. OFA welcomed the published draft 2019 PPS for ignoring those calls, thereby reserving Ontario's prime agricultural areas for agricultural uses, agriculture-related uses and on-farm diversified uses.

#### **4. Are there other policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?**

This question omits asking about protecting the environment, farmland and public health and safety in addition to housing, job creation, and streamlining of development approvals. We question why these key considerations were omitted. Land use planning is a delicate balancing act, considering our needs to address protecting the environment, farmland and public health and safety as well as addressing future growth in housing and job creation, and streamlining of development approvals. The PPS has traditionally directed those using the document to read it in its entirety, and then apply the applicable policy or policies to the situation at hand. Focussing on the environment instead of growth, or growth instead of the environment are equally misguided. Going forward, land use planning policies must emphasize the need to maintain this balance.

Policy 1.7.1 (Long-Term Economic Prosperity) alludes to the revitalization of small rural communities. Key to achieving economic prosperity for Ontario's small rural communities would include the extension of natural gas distribution lines combined with readily available high-speed internet service throughout **all** the unserved parts of rural and agricultural Ontario. Access to natural gas and high-speed internet service would enable Ontario's farm, rural and small-town businesses to compete globally. OFA recommends that language be added to policy 1.7.1 to achieve this.

OFA believes that the current PPS definition of “prime agricultural land” should be rewritten to expand the protection beyond the current “specialty crop areas and/or Canada Land Inventory Class 1, 2 or 3 lands” to read current “specialty crop areas and/or Canada Land Inventory Class 1, 2, 3 or 4 lands”. From a historical perspective, Ontario’s 1978 Food Land Guidelines, followed by 1986’s proposed Foodland Preservation policy statement both defined prime agricultural lands as being Classes 1 through 4 plus specialty crop lands. Some Class 4 soils are categorized as such due to a shorter growing season. Advancements that have brought us crop varieties that mature in fewer days facilitate crop production on Class 4 soils. In agricultural areas across Northern Ontario where Class 1-4 soils do not predominate, but agricultural production occurs, OFA believes that the highest two soils classes in the district or region should also be protected for their ability to produce local food, fibre or fuel. OFA strongly recommends that the current PPS definition of “prime agricultural land” be rewritten to read “prime agricultural land means specialty crop areas and/or Canada Land Inventory Class 1, 2, 3 or 4 lands” or in Northern Ontario, the highest two soils classes in the district or region. OFA further recommends that updates of Ontario’s soils maps must continue to completion.

#### **5. Are there other tools that are needed to help implement the proposed policies?**

In the section addressing the relationship between the PPS and Provincial Plans on page 5, there is no mention of either the Oak Ridges Moraine Conservation Plan or the Niagara Escarpment Plan. References were in the 2014 PPS and OFA requests that references to these Plans should be restored to the 2019 PPS.

In paragraph 2 on page 7 language is omitted acknowledging that recreational activities that occur on private lands require the prior permission of the landowner. Trespass on farmlands can have unintended financial consequences for the farmer. Livestock, poultry or plant diseases can be transmitted through one’s footwear, or on vehicle tires. Many farmers permit recreational activities to occur on their farms, but only with the farmer’s permission. Omitting acknowledgement that recreational activities occur on private lands require the prior permission of the landowner in a provincially sanctioned document is unacceptable. OFA requests that the language in paragraph 2 be rewritten to reinforce that recreational activities can only occur on private lands with the prior permission of the landowner.

While Ontario has required the identification and protection of significant natural heritage features and areas for quite some time, the Ontario government has failed to fund on the ground verification that the feature exists where it is indicated, and that its areal extent has been delineated. All too often, private landowners, including farmers, find out that a significant natural heritage feature or area has been identified on their land. This occurs long after the municipal Official Plan and Zoning By-law have been amended. Finding out at the back end of the process places the full onus on the private landowner to correct any mistakes in feature identification, areal extent mapping or both. To bring credibility to the identification and protection of significant natural heritage features and areas, OFA demands that the province must commit to fund on the ground verification that the feature exists where it is indicated, and that its areal extent has been delineated.

The 2019 draft PPS document makes a passing reference to Guidance Material for the PPS on page 4. The wording in the 2019 draft is the same as in the 2014 PPS. Over the years the PPS has been in force, the Provincial Government has developed a range of Guidance Materials to assist in the implementation of the PPS. Unfortunately, the PPS does not include a list of these Provincially developed and approved materials in the document itself. Furthermore, a list of these materials is quite difficult to find on the Ministry of Municipal Affairs and Housing’s website. This is unacceptable. Planners should not have to go to great lengths to find these materials. They have been developed to assist planners in implementing the PPS. The lack of easy access to



these materials leads planners to rely on “guidance” developed by third-party organizations which lack the credentials of provincial review and approval. OFA strongly recommends that these Provincially developed and approved materials either be listed in the PPS, or there should be a link to them to a web page listing the approved guidance materials. Ideally, the revised PPS should list the approved guidance materials in the document itself, preferably in Section 4.0, Implementation and Interpretation.

Upper and lower tier municipalities are obligated to update their Official Plans on a regular basis; no more than every 10 years. The same cannot be said of municipal Zoning By-laws. We know of one single tier municipality, amalgamated 18 years ago, that is only now engaged in consolidating its multiple Zoning By-laws. Reliance on out-of-date Zoning By-laws stifles development and adds unnecessary costs to proponents. Municipalities should be required to update their Zoning By-laws at least every 10 years, ideally after updating their Official Plan. OFA recommends that municipalities be mandated to update their Zoning By-laws. Furthermore, OFA recommends that the province financially assist municipalities to achieve this.

One of the underlying themes of this PPS review is supporting certainty and economic growth. OFA believes that distributing economic growth across all Ontario municipalities will serve to bolster municipalities with stagnant or declining population while at the same time lessen the impacts of sprawl, congestion and high housing costs in the Greater Toronto-Hamilton Area. Agri-food is an economic powerhouse in this province and will continue to create good jobs and generate economic growth as long as farm businesses are supported with smart land use policies and the infrastructure to thrive.

OFA welcomes this opportunity to provide its agricultural perspective on the Provincial Policy Statement Review – Proposed Policies. We look forward to the Province’s revisions to the Provincial Policy Statement reflecting OFA’s advice and recommendations.

Sincerely,



Keith Currie  
President

KC/pj

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing  
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors