

April 29, 2022

Planning Consultation
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON
M7A 2J3

Submitted via email to: planningconsultation@ontario.ca and submitted online via the Environmental Registry of Ontario (ERO)

Dear MMAH Officials:

RE: ERO #019-5287 – Seeking Feedback on Housing Needs in Rural and Northern Municipalities (Consultation on the More Homes for Everyone Plan)

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across Ontario, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, businesses, and communities.

First, OFA would like to call out that the Ministry has already implemented several changes to Ontario's land use planning regime because of the *More Homes for Everyone Act*, including those to the *Planning Act*, which received Royal Assent on April 14, 2022. The Ontario Government legislated these changes during an open public consultation period. Therefore, all the discussed 'proposed' changes are already in effect, despite the consultation proposal details promising that "any specific policy proposals to address these unique housing needs would be consulted on *prior* to the government making any changes."

We request the Ministry to earnestly consider our comments, recommendations, and concerns regarding rural housing needs as we advance before unsystematically implementing any further changes without giving due consideration to public comments. OFA appreciates this opportunity to provide input to ERO #019-5287 to provide feedback on the unique housing needs and opportunities in rural and northern municipalities. We look forward to giving suggestions on the importance of supporting a range of housing options and increasing housing supply in municipalities as part of the broader suite of consultations in the Ontario government's proposed More Homes for Everyone Plan, while recognizing the need to protect our agricultural land for agricultural purposes.

Before providing comments concerning the discussion questions, we must acknowledge that less than 5% of Ontario's land base can support agricultural production. Ontario's agricultural lands

are a finite and shrinking resource. We cannot sustain continuing losses of agricultural land while maintaining our ability to produce food, fibre and fuel from this limited and declining agricultural land base. From 2011 to 2016, the Census of Agriculture indicated that Ontario lost 319,700 acres of Ontario farmland, equivalent to 175 acres of farmland per day. Ontario is losing some of its most productive agricultural land to pressures for urbanization and growth enabled by provincial policies and tools. OFA is not against development – we fully support housing and population growth in Ontario. Our positions are based on *where* and *how* Ontario will grow because when agricultural land is paved over, it is lost forever. If Ontario plans to continue to grow and prosper, we must also have a plan to protect Ontario's capacity to produce food, fibre, and fuel for Ontarians and others.

We recognize the challenges various rural and northern stakeholders have expressed concerning housing. We also recognize that protecting farmland is a balancing act amongst other provincial priorities. However, addressing rural and northern Ontario's unique housing needs must acknowledge that our agricultural areas provide food, fibre and fuel, and a broad range of environmental and ecological goods and services that benefit all Ontarians. Stronger protections against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements would achieve objectives for sustainable community building and farmland protection for future generations.

The consultation background notes that the Ontario government recognizes that there is no “one size fits all approach” and provides examples to address housing needs. OFA would like to add and underline that addressing our housing needs means changing how Ontario has traditionally planned for housing supply and communities in past decades. We can no longer sustain vast losses of farmland to support sprawl-induced housing and urban development. Any proposals, ideas, or strategies adopted must complement other provincial priorities, including protecting farmland and other natural areas, provincial infrastructures such as provincial highways and the agri-food network, growth management, and the agricultural economy.

Following this preface, OFA offers the following comments for the discussion questions:

- 1. What are the key barriers impacting your municipality in meeting its housing needs that may be unique to northern and rural communities?**
- 2. What kind of flexibility is needed to address housing needs in your municipality?**

Speaking from an agricultural perspective, OFA offers the following comments on the barriers impacting our farming communities and the flexibility needed to meet their housing needs:

Automatic Merging of Property Titles

OFA would like to reiterate our comments on the matter of merged property titles. The consultation proposal notes that "recent changes to the *Planning Act*, which came into effect on January 1, 2022, make it easier to transfer parcels of land by clarifying Ontario's subdivision control system." We would like to express our thanks and support for the decision to end the automatic mergers of properties under the Land Registry System for those titles which have historically merged automatically upon the death of a joint tenant. This change is a relief for many of our farm family members; however, many of our members are still engaged in the process of unmerging titles, which can be costly. We want to reiterate the request made in our previous submissions that since these kinds of automatic mergers have been discontinued, a straightforward process for unmerging them needs to be communicated to the local planning authorities and land division committees.

Also, there are still many instances where property titles will automatically merge with no notification and two Municipal Property Assessment Corporation (MPAC) assessment notices with different property roll numbers are still sent to the property owner. The farmer may still be unaware of the automatic mergers, causing issues when selling or transferring parcels of land or finalizing the farm's succession. OFA continues to advocate that the Ontario government change the Land Registry System so that the practice of automatic merging is discontinued.

Should the practice of this type of automatic merging continue under the Land Registry System, OFA believes that mandatory advanced notification (i.e., before titles are changed that would merge abutting properties) should be given to the landowner, as well as the opportunity for the landowner to reconsider this transaction. Further, we request that the local planning authority be granted the power to cancel automatic mergers in a timely and efficient manner when the farm property owner has not requested and does not support the merging of their abutting properties.

Accommodations for Farm Labour

Ontario farmers often require on-farm or off-farm accommodations for full-time farm and seasonal workers when additional labour is required. Depending on the farm operation's needs, size, and scale, this can range from simple repurposing of surplus houses to larger bunkhouse accommodations. The Provincial Policy Statement (PPS) 2020 defines "onfarm buildings and structures, including but not limited to... accommodation for full-time farm labour when the size and nature of the operation requires additional employment" as an *agricultural* use and permits these uses in *prime agricultural areas*.¹

Despite these PPS policies, OFA is increasingly hearing concerns raised by our members who are challenged with securing time- and cost-prohibitive planning approvals at the municipal level to construct affordable and appropriate worker housing for domestic and international farm workers. Some municipalities are excluding such uses from their definitions of *agricultural uses* in their Zoning By-laws and are subjecting uses to a Zoning By-law Amendment – a much lengthier and costly approval process.

OFA urges the Ontario government to work with rural municipalities to enforce on-farm accommodations for labour as an *agricultural use* which should be permitted as of right in municipal Official Plans and Zoning By-laws. Enhanced training on the *Guidelines for Permitted Uses in Ontario's Prime Agricultural Areas* (2016)² for municipalities would be of benefit to ensure consistent interpretation and implementation of provincial guidance on accommodations for full-time labour. Our employers seek consistent interpretation and implementation of regulations across Ontario that also provide enough flexibility for Ontario's farmers to construct safe and quality accommodations for farmworkers suitable to the needs of their operation and servicing of the area. In doing so, OFA wants housing for farm labour to be consistent with current provincial guidance, including minimizing the amount of land taken out of production and prohibiting severances for on-farm labour accommodations.

Further, farm employers across different regions of Ontario have also experienced unexpected obstacles when using existing houses, apartment buildings or other boarding, lodging, and

¹ Ministry of Municipal Affairs and Housing. "Provincial Policy Statement, 2020." Queen's Printer for Ontario, 2020. <https://files.ontario.ca/mmah-provincial-policy-statement-2020-accessible-final-en-2020-02-14.pdf>.

² Ministry of Agriculture, Food and Rural Affairs. "Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas." Queen's Printer for Ontario, 2016. <http://www.omafr.gov.on.ca/english/landuse/permitteduses.htm>.

rooming accommodations to provide safe and comfortable housing for international farm workers. The concern is about inconsistent and applied provisions in the Ontario Building Code by municipal building officials and inconsistent guidance by local public health officials. OFA would like to see an ongoing and constructive dialogue between farm employers and government agencies on addressing these obstacles to the responsible and safe use of existing housing and buildings to increase housing opportunities for international farm workers.

Lot Creation and Fragmentation of the Agricultural Land Base

The consultation proposal details initial examples to support rural and northern municipalities' housing needs, including "lot creation in rural areas" and "lot creation in agricultural areas (e.g., additional support for family-owned farms)." The proposal further details that these ideas need to complement other provincial priorities, such as protecting prime agricultural areas and the rural and agricultural economy.

Concerning this initial idea, OFA opposes creating new lots to create new residential developments in the agricultural area which can lead to fragmentation of the agricultural land base and overall cumulative farmland loss. Maintaining large, contiguous tracts of agricultural land for agricultural uses must continue to be a core provincial priority. The PPS (2020) provides limited circumstances for lot creation in prime agricultural areas. OFA supports lot creation *only* under these limited circumstances. OFA believes lot creation policies must remain as they are in the PPS (2020) to ensure the continued viability of the agricultural sector.

OFA categorically opposes any reintroduction of lot creation for 'residential severances in Ontario's prime agricultural areas. We request care be taken to ensure proposals to meet rural housing needs do not have unintended lot creation consequences inconsistent with the PPS and the provincial priority to protect agricultural lands.

Policies permitting these residential lots were removed from the PPS in 2005 for a reason, and this was a change that OFA applauded. Going backwards and allowing lot creation in the agricultural area is a poor planning policy. Residential severances will increase servicing costs to the municipality for this scattered development.

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 about agricultural odours, noises, dust, flies, chemical applications, sharing of the road with slow-moving farm machinery, and more from *normal farm practices*. Permitting just a single 1-acre non-agricultural land use to locate within a larger agricultural area effectively halts the ability of the surrounding livestock farm to expand due to Minimum Distance Separation (MDS) constraints. Any proposals for lot creation to provide 'additional support for family-owned farms' to address housing needs and facilitate municipal growth are unjustified. Research on residential severances shows that these lots remained in the hands of the person/couple they were created for, for an average of 2½ to 3 years before they changed hands and were sold to someone outside of the farm family or individuals without any involvement in the agricultural industry.³ This policy move can effectively sterilize important farmland, create conflicts later, and introduce incompatible uses in the long term.

³ Dykstra, R. S. "Retirement Lot Severances in Ontario: An Assessment of Ownership Patterns, Location, and Perceptions." University of Guelph, 2004. <https://atrium.lib.uoguelph.ca/xmlui/handle/10214/19729>.

Given agriculture's role as Ontario's leading economic sector, hindering it through residential lot creation in agricultural areas is counterproductive. To clarify, OFA categorically opposes any additional residential lot creation options for Ontario's agricultural areas and recommends prohibiting any consideration of lot creation for new residential uses in agricultural areas.

We recognize the benefit of having additional housing opportunities to provide additional support for family-owned farms; however, Ontario's 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. In agricultural areas, garden suites could serve as an alternative to creating a residential lot and their related adverse effects. OFA recommends the Ontario government work more closely with municipalities to encourage broader use of garden suites through awareness of section 39.1 of the *Planning Act*. Other options to permit housing on farm operations without creating an additional lot include utilizing existing space in an outbuilding and mobile homes. 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. There are plenty of existing and innovative opportunities to permit additional dwellings on farm properties to support family-owned farms without defaulting to lot creation policies. OFA is in favour of the use of the many existing policies and tools available for municipalities to address additional dwellings on farm properties that do not interfere with agricultural operations.

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 do we continue to burden farmers by inserting non-agricultural uses into our agricultural areas? OFA urges the Ontario government to preserve Ontario's prime agricultural areas for agricultural uses, agriculture-related uses, and on-farm diversified uses, by not acting on calls to insert non-agricultural uses into our agricultural areas.

3. What potential tools or policies could the government consider addressing housing needs in your municipality while balancing other provincial priorities?

The Ontario government could consider various existing and novel tools and policies in addressing housing needs in municipalities across Ontario while balancing other provincial priorities. OFA offers the following recommendations and encourages the Ontario government to:

Utilize the existing provincial land use policy planning framework and encourage greater use of existing, underutilized municipal tools in the Planning Act.

The provincial land use planning policy framework, such as the PPS (2020) and the Growth Plan for the Greater Golden Horseshoe work together to support the government's objectives to increase housing choices and protect farmland. An existing range of tools, including financial, regulatory, and policy, also support this land use policy framework. Many municipalities in southern Ontario already have rigorously designed and implemented Official Plans and Zoning By-laws informed by community input. If municipalities desire quick, efficient, and locally appropriate changes to these policies to address our rural housing needs, then there are existing tools and processes in place to do so; examples include: the Official Plan Review, Official Plan Amendments, Zoning By-law Amendments, Community Planning Permit System by-laws, inclusionary Zoning, Garden Suite policies, Additional Dwelling Unit policies, incentives within

Development Charges by-laws, and more. To suggest significant changes to the planning policy framework otherwise undermines the value of these policies and public confidence in the system. Yet, some of these tools, such as the Community Planning Permit System, are severely underutilized in Ontario municipalities despite existing in legislation. Such devices have great potential to streamline development approval processes. OFA recommends using and encouraging greater use of these existing tools, policies, and processes within existing urban boundaries and rural settlement areas to manage the housing situation, which must pursue responsible planning outcomes and contribute to developing complete, dense, and transit-supportive communities.

Mandate fixed boundaries, density, and intensification targets in all of Ontario's municipalities.

We urge the Ontario government to adopt land-use planning legislation and policies that fully reflect that growth management and farmland protection are two sides of the same coin. Stronger protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements would better utilize infrastructure, improve the financial viability of public transit, and protect our prime agricultural lands from sprawl.

Intensification of residential development within the existing urban footprint, in the context of complete and liveable communities, along with the distribution of economic development province-wide, will sustainably address our housing needs now and into the future. Intensification in existing urban and settlement areas will boost economic growth, create new jobs, provide new affordable housing options, support municipal infrastructure systems, ensure food security, and contribute to environmental stewardship.

OFA supports fixed, permanent urban boundaries to limit the loss of agricultural land, thereby focusing future urban growth within existing urban boundaries. This recommendation means urban growth primarily through redevelopment of vacant and underused lands, the rehabilitation and redevelopment of “greyfield” and “brownfield” sites and higher density development. We further believe the Ontario government should mandate higher density development province-wide to take full advantage of existing infrastructure in urban areas. OFA supports the urban intensification to protect agricultural land.

OFA recommends the Ontario government explore the use of a range of buffer forms located on the urban side of the settlement boundary, better to separate the urban uses from agricultural uses and avoid complaints about *normal farm practices*. Buffering could take the form of roads, vegetated buffers, or parklands. An Agricultural Impact Assessment can inform other options to minimize or mitigate the impacts of settlement expansions on agriculture.

Support and build rural municipalities' capacity to update and align outdated Zoning By-laws with Official Plans and provincial policies and provide provincial stability in land use planning policy once legislated changes occur.

OFA wants the Ministry to recognize that quick implementation of policies and tools to address housing quickly and efficiently may pose challenges for municipalities, primarily rural and small-town municipalities at the lower-tier level. OFA worries continued changes to Ontario's land use planning policy framework will disproportionately impact rural communities. These municipalities may not have the municipal capacity, such as staff resources or expertise, to adopt these downloaded responsibilities, utilize new tools, or implement changing provincial policies.

For example, the Ontario government most recently made several amendments to section 41 Site Plan Control Area of the *Planning Act* to delegate an authorized staff member with trained expertise, by the municipal council, as the approval authority for Site Plan Approvals. These changes are primarily applicable to single-tier and lower-tier municipalities. OFA is supportive of these changes, as we see Site Plan Control being best addressed, handled, and approved by municipal staff with the relevant expertise at the local level. However, OFA worries these changes will disproportionately impact rural communities that may not have the capacity to take advantage of these newly legislated tools.

Many of Ontario's smaller rural municipalities have only one (1), half (0.5), or no (0) planners on staff⁴ to be able to delegate this approval authority. In some cases, municipal councils would lead the site plan process themselves or subject all applications to a Zoning By-Law Amendment if the use is not permitted as of right. Relying on Zoning By-law Amendments is much more time- and cost-intensive, is open to public consultation, and is still subject to appeals – adding as many as 18 or more months to the planning approval process.⁵ In these instances, municipalities will revert to square one when attempting to streamline planning approvals for progressive housing developments. In contrast, Site Plan Control is informed by expertise, can be simplified, scoped to fit the context of the property, and is only appealable by the applicant. OFA wants all municipalities to take full advantage of the Site Plan process, but they can only do so with their available resources.

Further, municipalities may update their Zoning By-laws to be more permissive and progressive when permitting higher-density and transit-supportive housing options as-of-right and then subject these applications to a streamlined Site Plan Control process. However, many rural municipalities, particularly at the lower-tier level, have outdated Zoning By-laws as they lack the resourcing to update policies to conform to new policy changes at the upper-tier and provincial levels. Frequent provincial reviews and changes to plans and policies further serve as barriers to new housing developments; municipal capacity to adapt often lags these changes to provincial plans. Upper and lower-tier municipalities are obligated to update their Official Plans regularly, no more than every five years. The same rule does not apply to Zoning By-laws. Reliance on out-of-date Zoning By-laws stifles development and adds unnecessary costs to proponents.

For example, when the Ontario government amended the Growth Plan for the Greater Golden Horseshoe in 2017, it gave municipalities five years to adopt and implement these changes to conform to local policy. Before this timeline, the Ontario government further amended the Growth Plan in 2019 and then again in 2020 – before municipalities had a chance to conform to the previous changes. These provincial Growth Plan amendments further delayed municipalities' progress for plan conformity as they had to redo studies and planning work. The Auditor General of Ontario even noted that “numerous changes in policies have created instability in the land use planning process.”⁶ As a result, OFA worries rural municipalities will be left behind in the provincial legislative push for more housing as they continuously try to ‘catch up’ on the legislative and policy treadmill.

⁴ Caldwell, Wayne, Elise Geschiere, Emily Sousa, and Regan Zink. “Municipal Capacity: A Case Study of Ontario's Greenbelt to Respond to Emerging Agriculture and Agri-Food Priorities.” *International Journal of Environmental Impacts: Management, Mitigation and Recovery* 4, no. 3 (July 28, 2021): 243–61. <https://doi.org/10.2495/EI-V4-N3-243-261>.

⁵ Ontario Professional Planners Institute (OPPI). “OPPI's Top 10 Housing Supply & Affordability Recommendations,” February 10, 2022. https://ontarioplanners.ca/OPPIAssets/Documents/Policy-Papers/OPPI-Top-10-Housing-Supply-and-Affordability-Recommendations.pdf?fbclid=IwAR2mFhW1OyGZxiRK7stgoNB1b7au6LAtqGgDXOwZGxOcnYakeH5_87enlxs.

⁶ Office of the Auditor General of Ontario. “Value for Money Audit: Land-Use Planning in the Greater Golden Horseshoe.” Value-for-Money Audit. Ontario, 2021. https://auditor.on.ca/en/content/annualreports/arreports/en21/AR_LandUse_en21.pdf.

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OFA urges the Ministry to ensure any further changes to support housing at the provincial level have been analyzed from a rural-municipal perspective. We also ask the Ministry that the necessary support, such as additional time, funding, training, and expertise, are provided to municipalities to enable them to utilize these legislative tools to their benefit. OFA recommends mandating municipalities to update their Zoning By-laws, and that the Ontario government financially assist municipalities in achieving this requirement. Municipalities should be required to update their Zoning By-laws at least every five years, ideally after updating their Official Plan. Lastly, OFA recommends the Ontario government provide a period of policy stability to allow municipalities to adapt to the land use planning policy framework changes once the upcoming round of policy changes is in place.

Create an independent, non-partisan Office of the Legislative Assembly to provide oversight of the municipal implementation of provincial land use plans and policies.

The Office of the Auditor General of Ontario Value-for-Money Audit identified concerns concerning the lack of reporting, oversight, and guidance relating to the municipal implementation of the Growth Plan for the Greater Golden Horseshoe. For example, the report stated that the Ontario government has failed to consistently report on the outcomes of the municipal implementation of the Growth Plan; municipalities are falling short of their density targets outlined in the Growth Plan, as only four of 25 Urban Growth Centres are on track to meet their density targets by 2031.⁶ Further, 70% of municipal planners surveyed stated they lacked sufficient direction and guidance from provincial staff needed for Growth Plan implementation.⁶

Creating an independent, non-partisan Office of the Legislative Assembly would address these gaps by operating as an arm's length oversight and advisory function for the municipal implementation of provincial planning policy. This Office of the Legislative Assembly could track progress towards the Growth Plan's municipal implementation and publicly publish annual progress reports on municipalities' Growth Plan targets. This Office could also provide arm's length recommendations and guidance to municipalities whose plans and decisions are misaligned with provincial plans and policies and guide them on a path to conformity. While one could argue that the Minister plays this role to a certain extent being the approval authority for many plans, this Office would work to resolve differences between *multiple* Ontario Ministries and municipalities on land use planning policies and plans at the municipal level.

OFA is increasingly concerned with the ability of municipalities, particularly smaller, rural municipalities to meet the (rapidly) ever-changing planning requirements directed by the Ontario government. Our concern is further supported by the results in The Office of the Auditor General of Ontario Value-for-Money Audit. We recommend the creation of an independent, non-partisan Office of the Legislative Assembly to address these gaps by operating as an arm's length oversight and advisory function for the municipal implementation of provincial planning policy. This Office could also provide arm's length recommendations and guidance to municipalities whose plans and decisions are misaligned with provincial plans and policies and guide them on a path to conformity. We believe the misinterpretation of the agricultural provisions of the PPS could be effectively addressed here, along with providing efficient guidance that may eliminate some of the delays in addressing Ontario's housing concerns.

Encourage greater use of Agricultural Impact Assessments at the urban-rural interface at provincial and municipal levels.

Agricultural Impact Assessments (AIAs) are currently required to expand a municipal settlement area boundary within the Growth Plan Area. Municipal settlement area boundary expansions,

which result in the loss of agricultural land, pose a serious threat to food production and food security. OFA is a strong advocate for the protection of Ontario farmland. The continued loss of agricultural land is unsustainable. We also note that urban development can impact neighbouring farms. Therefore, OFA firmly believes in the widespread use of AIAs. As studies, AIAs identify opportunities to increase compatibility between agricultural and non-agricultural uses by looking for ways to avoid, minimize, then mitigate adverse impacts on agricultural operations and the Agricultural System.

AIAs will help us plan for 'farm-friendly' urban development that promotes compatibility at the urban-agricultural interface. For example, subdivision plan design offers opportunities to improve compatibility between agriculture and residential development. Parcel size, configuration, building setbacks, road patterns, institutional locations, drainage patterns and location of municipal servicing will all have implications for agriculture. Informed by the recommendations outlined in an AIA, subdivision plan design as a tool can achieve site and building design layouts that will avoid, minimize, and mitigate potential land-use conflicts. These tools will ensure that *agricultural uses* continue, and *normal farm practices* are protected.

OFA believes existing provincial policy requirements, such as mandated AIAs, must continue to apply to settlement area expansions. We encourage greater use of this crucial resource in the future, including in plans of subdivision approvals and other urbanizing residential uses which may encroach into the agricultural area. We urge the Minister and municipalities to recognize the evidence-based advice outlined in AIAs and ensure the measures and recommendations are included in the conditions for residential planning approvals, such as subdivision approval. We look forward to seeing province-wide implementation and widespread use of AIAs as we work to address the growth of Ontario's housing supply while also enabling a thriving agri-food sector.

Halt the unprecedented and unjustified use of Minister's Zoning Orders in municipalities where Ministry-approved Official Plans and Zoning By-laws exist.

OFA has continuously emphasized our opposition to the frequent use of MZOs in areas where there is already a robust planning process. MZOs are still proliferating to fast-track development at the expense of good planning outcomes and disregard matters of provincial interest. The continuous unprecedented use of MZOs is a significant threat that will result in the permanent loss of farmland to development – regardless of whom they may be issued or requested by.

OFA strongly opposes using MZOs for municipalities with well-developed, Ministry-approved Official Plans and Zoning By-laws.

The More Homes for Everyone Plan has made changes under section 34 of the *Planning Act* to allow the use of the Community Infrastructure and Housing Accelerator (CIHA) and municipally requested MZOs issued at the discretion of the Minister. The Minister is not permitted to issue these Orders in the Greenbelt Area. OFA views these proposals as a piecemeal approach to farmland and environmental protections. Irrespective of excluding these Orders from the Greenbelt area, areas outside the Greenbelt boundary are under intense pressure for residential development. These pressures are only exacerbated by tools such as MZOs. The current MZO legislation found in Section 47 of the *Planning Act* is proposed to remain intact. Ministerial authority under Section 47 is still available to continue to issue MZOs unprecedentedly, as the Ontario government has unjustifiably done. Overall, the current system results in a cumulative loss of agricultural lands based on prioritizing development and growth over farmland preservation.

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We know there are existing opportunities in Ontario's land-use planning system to streamline and encourage responsible development, which can clearly align with provincial and municipal goals and will not be open to interpretation or lengthy reviews and appeals. These opportunities will reduce red tape, satisfy our need for sustainably built housing, and attract economic investment. Agriculture and agri-food businesses must be able to invest in their operations and diversify their products with confidence that farmlands will be available. Ontario farmers cannot do so if MZOs as draconian tools are continuously used to pave over our farmlands. Our ability to feed Ontarians and economic growth relies on knowing that encroaching development will be limited and not hinder our ability to farm and remain viable into the future.

4. Do you have other suggestions for improving housing supply and needs in rural and northern municipalities?

Lastly, we would like to note that many challenges have contributed to Ontario's current housing affordability crisis, some of which go beyond the land use planning policy framework. Other factors include the impacts of a low-interest rate environment, speculative demand, labour shortages and costs, trade availability, supply chain delays, availability of municipal servicing, Development Charges, NIMBYism, inflation and higher material and construction fees, amongst others. While our comments stem from the land use and farm property perspectives, we encourage the Ontario government to recognize and address these other factors in tandem with any reform to the planning system.

OFA appreciates the opportunity to provide our agricultural perspectives on the needs, challenges, and opportunities for housing in rural and northern communities. We look forward to working with the Ontario government and our municipal counterparts to grow Ontario's housing supply and communities sustainably. Any future changes to Ontario's land use planning policy framework must protect our agricultural land base, local food production, and food security and support our agri-food sector as an economic powerhouse for generations to come. Decision-makers must never lose sight of this reality when making decisions about the future of agricultural land lost to development for housing.

Sincerely,



Peggy Brekveld
President

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