

December 9, 2022

Planning Consultation  
Provincial Planning Policy Branch  
Ministry of Municipal Affairs and Housing  
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Toronto, ON M7A 2J3

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

Dear Ministry of Municipal Affairs and Housing officials:

**RE: ERO #019-6197 Proposed Changes to Ontario Regulation 299/19: Additional Residential Units**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities. Decision-makers must never lose sight of this reality when making decisions about housing for population and employment growth and the potential impacts to agricultural land, industries, and communities.

We appreciate this opportunity to provide input to ERO #019-6197, the proposed changes to Ontario Regulation 299/19: Additional Residential Units.

Before providing comments, we must acknowledge that over half (52%) of Canada's prime soils are in Ontario and that farmland makes up less than 5% of Ontario's land base. Yet, from 2016 to 2021, the Census of Agriculture indicated that Ontario lost the equivalent of 319 acres a day. Further, between 2000 – 2017, southern Ontario lost more than 72,000 acres of prime agricultural land to Official Plan Amendments approved for urban development.<sup>1</sup> Recent decisions over the last few weeks from the Ministry of Municipal Affairs and Housing to expand the urban boundaries

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<sup>1</sup> Caldwell, Wayne, Sara Epp, Xiaoyuan Wan, Rachel Singer, Emma Drake, and Emily C. Sousa. "Farmland Preservation and Urban Expansion: Case Study of Southern Ontario, Canada." *Frontiers in Sustainable Food Systems* 6 (February 18, 2022): 777816. <https://doi.org/10.3389/fsufs.2022.777816>.

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in municipal Official Plans (i.e., Halton, Hamilton, Niagara, and Ottawa) by over 14,500 acres show that the reported numbers of acres lost are an underestimation.

OFA recognizes the need to construct more housing in Ontario and the provincial government's goal to create 1.5 million homes to meet projected population growth trends. However, we must also acknowledge that building homes and protecting farmland are both matters of provincial interest, and both are goals that Ontario need not treat as mutually exclusive.

### ***Accelerating Implementation of Additional Residential Units***

Changes are proposed to strengthen the existing "additional residential unit" (ARU) framework to allow, up to three ARUs per lot, as-of-right provincewide in existing residential areas by overriding existing municipal official plans and zoning by-laws. This would be three units in a primary building or up to two in a primary building and one in an ancillary structure. These changes only apply to newly defined "parcels of urban residential land" in settlement areas with full municipal water and sewage services.

OFA applauds the provincial government for taking this sweeping measure to intensify housing development within existing urban boundaries. However, OFA challenges the Ontario government to be more ambitious by increasing the density of units allowed on a parcel of urban residential land. We firmly believe the government should take a more assertive approach to end exclusionary "single detached" zoning and allow for mid- to higher densities (beyond just three units) as-of-right provincewide. There is plenty of land within existing municipal urban boundaries to build more homes faster. The current ARU proposal would create just 50,000 out of the Ontario government's ambitious goal of 1,500,000 promised homes (a mere 3.33% of total dwellings proposed) and fails to allow purpose-built walk-up mid-rise apartments or townhomes as-of-right. This proposal falsely justifies sprawl-inducing development to address the housing supply and affordability crisis when further increased densities on existing land could achieve denser, walkable, and lower-cost forms of housing.

OFA wants the proposed regulations for ARUs to be applied to rural and smaller-town municipalities within designated settlement areas. We acknowledge the servicing capacity limits many rural communities in Ontario face, such as that with private water and wastewater services. However, rural communities also need additional housing. There are opportunities within existing smaller villages, hamlets, and towns to intensify parcels of land in the settlement area that are adequate for servicing and more efficiently contribute to the rural tax base.

We desire to work with the Ontario government to increase density and housing in rural Ontario in ways that do not sacrifice farmland. Anywhere low-density housing already exists presents critical opportunities to advance "gentle density" that addresses the provincial housing supply, preserves farmland, and builds complete communities characterized by smart growth principles in land use planning. The Ontario government could apply this form of increased gentle density to parcels containing single-detached dwellings that have historically been severed from a primary farm operation. OFA strongly views this as a creative alternative to further densify housing in the agricultural area without further sacrificing farmland or fragmenting the agricultural land base through lot creation. OFA wants to clarify that it opposes any re-introduction of severances in the agricultural area.

OFA notes that the Housing Affordability Task Force has identified that "a shortage of land isn't the cause of the problem. Land is available, both inside the existing built-up areas and on

undeveloped land outside greenbelts.” OFA encourages the provincial government to listen to their experts and continue exploring avenues to address housing supply which do not sacrifice farmland.

We urge the provincial government to implement changes to build more homes faster that reflect that growth management to meet housing demand and farmland protection are two sides of the same coin. More robust protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements will achieve community development and farmland protection objectives. Intensification of residential development within the existing urban footprint will boost economic growth, create new jobs, provide new affordable housing options, support municipal infrastructure systems, ensure food security, and contribute to environmental stewardship. These opportunities will reduce red tape, satisfy our need for sustainably and efficiently built housing that is both affordable and attainable, and attract economic investment.

### ***Waiving Development Charges***

New residential units, even additional units in an existing residential area, contribute to growth-related capital expenditures. Therefore, the proposals to exempt ARUs from development charges will put additional strain on municipal budgets and local taxpayers.

Additional strain on municipal budgets and the subsequent pressure to increase property taxes is of great concern to the farm community. In the last provincewide assessment MPAC provided, farmland values increased at a disproportionate rate and farmers in many municipalities across the province are paying a record high percentage of the municipal tax levy.

If the provincial government moves forward with these proposed changes, OFA believes the provincial government must commit to significant new funding for municipal infrastructure to avoid negatively impacting local property taxpayers.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the proposed changes to Ontario Regulation 299/19: Additional Residential Units. We must ensure that any future changes to Ontario's land use planning policy framework protect our agricultural land base and support our agri-food sector as an economic powerhouse. We look forward to working with the provincial government and our municipal counterparts to sustain our province's housing supply and communities.

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