

December 23, 2022

Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3

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

Dear Ministry of Municipal Affairs and Housing Officials:

RE: ERO #019-6177 Review of A Place to Grow and Provincial Policy Statement

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. OFA is passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA appreciates this opportunity to provide input to ERO #019-6177 Review of A Place to Grow (APTG) and Provincial Policy Statement (PPS) as the Ministry of Municipal Affairs and Housing (MMAH) seeks input on how to create a streamlined provincewide land use planning policy framework that enables municipalities to approve housing faster and increase housing supply.

Over half (52%) of Canada's prime soils are in Ontario. Farmland makes up less than 5% of Ontario's land base.¹ The Census of Agriculture (2021) tells us that over the last twenty years, Ontario has lost farmland area that is equivalent to eleven times the size of Toronto, or roughly the entire size of the Greater Toronto Area (1,741,286 acres). Since 2000, we have lost 238 acres of farmland a day. Over the last five years, this has increased to 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, most of which were a result of large urban boundary expansions.³ Recent decisions over the last few weeks from the Minister of Municipal Affairs and Housing to expand the urban boundaries 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.

^{1,2} Statistics Canada. (2021). Census of Agriculture. <https://www.statcan.gc.ca/en/census-agriculture>.

³ 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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The government's goal to build 1.5 million homes over the next ten years currently exceeds the number of households in the City of Toronto alone (1.2 million households).² Decisions to where to put houses must consider the impacts on our vital, finite, scarce, and non-renewable land base

We implore the provincial government to take all measures to protect farmland while advancing their plan to build more homes.

OFA notes that the Housing Affordability Task Force has directed the provincial government to protect farmland and 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."⁵

OFA urges the provincial government to listen to their experts and explore other avenues to address housing supply which do not sacrifice farmland or the Agricultural System.

Several provincial policy initiatives, including the PPS, APTG, and the Greenbelt Plan, have offered a land use planning framework to minimize farmland loss rates, protect farmlands, *and* build more homes.

It is critical to remember that the role of APTG is to establish density and intensity requirements that several urban centers and regions outside of the Greenbelt (not subjected to Greenbelt Plan policies) need to adopt and implement into their Official Plans. The Greenbelt Plan identifies where development "should not go" to protect agricultural resources. While not prohibiting development in prime agricultural areas directly, the PPS and APTG as growth management policies work to facilitate the densification and intensification of urban areas and the mitigation of urban sprawl. This framework highlights the other side of the coin to farmland protection in land-use planning.

These policies establish a framework that consistently enhances municipal control over farmland protection and preservation in Ontario. OFA sees that APTG policies on urban intensification and densification must be included within the PPS for every municipality across Ontario to ensure the strength of the growth management framework provided by APTG is not lost. In fact, OFA would like to see these "Growth Plan level" policy requirements implemented and strengthened in the PPS. OFA stresses that the revised PPS requires mandatory compliance by municipalities with urban intensification and density targets and mandates fixed, permanent urban boundaries to contain urban sprawl.

The consultation states: "Policies of the PPS are outcome-oriented, *and some* policies allow flexibility in their implementation provided that the original intent of the policy is upheld." Currently, "under the *Planning Act*, planning decisions shall be consistent with policy statements such as the *PPS* and shall conform with provincial plans like A Place to Grow."

"Shall conform with" and "shall be consistent with" have different legal meanings and weighting in land use planning case law, with the latter being much more flexible than the former. Conformity is currently mandated in APTG, whereas the *Planning Act* underlines that planning decisions must be consistent with the PPS. At a minimum, OFA sees that municipal planning decisions should continue to follow the wording of "shall be consistent with" to ensure appropriate outcomes for farmland protection are achieved.

⁴ City of Toronto. (2022). 2021 Census: Families, Households, Marital Status and Income. <https://www.toronto.ca/wp-content/uploads/2022/07/9877-City-Planning-2021-Census-Backgrounder-Families-Hhlds-Marital-Status-Income.pdf>.

⁵ Housing Affordability Task Force, and Ministry of Municipal Affairs and Housing. "Report of the Ontario Housing Affordability Task Force." Queen's Printer for Ontario, February 8, 2022. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>.

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Further, the consultation states that:

“Planning decisions under A Place to Grow must demonstrate that provincial direction is explicitly satisfied, such as including specific population and employment forecasts in official plans, to ensure provincial interests are protected across the Greater Golden Horseshoe.”

Under Section 2 of the *Planning Act*, decision-makers with authority under the *Planning Act*,

“... shall have regard to, *among other matters, matters of provincial interest such as,*

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

(j) the adequate provision of a full range of housing, including affordable housing;

...

(k) the adequate provision of employment opportunities;...

(p) the appropriate location of growth and development;...

(q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians...”

These matters of provincial interest are not mutually exclusive and cannot be treated as such in municipal and provincial planning decisions. OFA sees that a merging of APTG and the PPS must demonstrate that provincial direction is explicitly satisfied to ensure all provincial interests are protected and balanced across Ontario. We are not against development but want to see provincial policies and legislation that meet the goals of all these provincial interests, without undermining Ontario’s agricultural resources.

The posting notes: “The current land use planning policy framework in Ontario has evolved over the last three decades... What remains is a complex system of overlapping policy instruments that can be difficult to navigate and implement.” Since the Ontario government is looking to alleviate the “complex system of overlapping policy” in land use planning, and merging APTG and the PPS is one way to achieve this, OFA wants to reiterate its existing position concerning the Greenbelt (see our comments on EROs #019-6216, #019-6217, and #019-6218). Our proposal may further look to remove complexity and overlapping policy in the land use system.

OFA asks that the Ontario government should designate all farmlands in Ontario that are outside of current settlement area boundaries as Greenbelt and afford them permanent protections from the threat of urban development. Doing so would mitigate ‘development leapfrogging’ and development pressures, remove the system’s complexity and layers of planning policy, and incentivize municipalities to comply with mandatory urban density and intensification requirements within their urban boundaries.

OFA recognizes the need to construct more housing in Ontario. The consultation documents specify this proposal intends to ensure the new, proposed “policy framework is housing-supportive” and helps the government meet the target to construct 1.5 million new housing units over the next ten years. However, we must acknowledge that building homes and protecting farmland are both matters of provincial interest, are synergistic goals to improve the wellbeing of all Ontarians, and are achievable. OFA emphasizes that many components of the current PPS are working well to achieve both goals, and there is no need to “throw the baby out with the bathwater.”

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An effective consultation process requires collaboration and communication across ministries and with relevant stakeholders throughout the process. OFA is one of these provincial key stakeholders. OFA has knowledge to share with MMAH as it and other ministries meaningfully and actively engage with the public when reviewing and revising provincial policy instruments. We look forward to such engagement.

OFA is open to working with MMAH and the Ontario Ministry of Agriculture, Food and Rural Affairs to find ways that build more homes and protect farmland and the Agricultural System. OFA sees that it is essential that inter-ministerial committees are enabled and engagement with relevant ministries occur as revisions are made to the PPS and APTG. Other ministries and their staff expertise can offer valuable insights to inform better decisions enabling agriculture to thrive while meeting other priorities. There is only one landscape, and the full range of urban, rural, agricultural, natural heritage, cultural heritage, and mineral extraction land use must coexist. The farming community is impacted (both positively and adversely) by all these aspects and policies in the PPS beyond just housing and urban development.

The consultation document emphasizes the “importance of the PPS and A Place to Grow in guiding land use planning decisions in Ontario.” Given the importance of the PPS and APTG to guiding land use that affects all matters of community, environment, health, and safety necessary to all Ontarians, OFA urges the government to hold further public consultations on the specific proposed wording changes on the revised APTG-PPS policy. Further consultations will help get this single, streamlined policy document correct. OFA sees another consultation on specific wording changes to the PPS as necessary and fundamental for good planning.

OFA recognizes that many challenges have contributed to Ontario's current housing affordability crisis, many of which go beyond the land use planning policy framework. For example, municipal leaders across Ontario are reporting hundreds of thousands of approvals for new housing units in the pipeline that have yet to be built by the construction industry over the last few years.⁶ Other factors include the impacts of a low-interest rate environment, speculative demand, labour shortages and costs, trade availability, supply chain delays, municipal servicing, development charges, NIMBYism, inflation and higher material and construction fees, amongst others. We encourage the Ontario government to recognize and address these other factors with any potential reforms to the planning system.

Comments on the Consultation Proposal

OFA agrees with leveraging the housing-supportive policies of both APTG and the PPS to create a new provincewide land use planning policy instrument; however, doing so cannot come at the expense of other societal interests, such as compromising agriculture.

OFA agrees the revised APTG-PPS policy should continue to protect the environment, cultural heritage, and public health and safety. We also believe the PPS should continue “*Building Strong Healthy Communities*” and protect “*Wise Use and Management of Resources*,” including “*Agriculture*” as these are priority areas and policy chapters in the PPS currently.

⁶ Vrbancovic, B., Jaworsky, D. McGarry, K., and Lehman, J. (2022, Jan, 18). Waterloo Region mayors call for collaboration to fix housing crisis. *The Record*. <https://www.therecord.com/opinion/2022/01/18/waterloo-region-mayors-call-for-collaboration-to-fix-housing-crisis.html?rf>

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OFA agrees that the new PPS should ensure growth is supported with the appropriate amount and type of community infrastructure – specifically, the new PPS should support community infrastructure that enables complete, transit-supportive, and dense community development.

OFA supports this policy review with the intended outcomes that municipalities would be enabled to accelerate housing development and increase housing supply, “including rural housing,” as well as Ontario’s agricultural and rural communities housing. OFA has offered several comments related to increasing rural housing supply in ways that support sustainable growth, complete communities, farmland protection (please see OFA submissions to ERO postings #019-5287, #019-6163, #019-5284 and Proposal #22-MMAH006). We urge MMAH to fully consider our comments and design policies that reflect these recommendations.

Residential Land Supply

1. Settlement Area Boundary Expansions

OFA supports fixed, permanent urban boundaries to limit the loss of agricultural land, thereby focusing future urban growth within existing urban boundaries. This means urban growth primarily through redevelopment of vacant and underused lands, and higher density development.

We further believe that in urban areas, higher density development should be mandated provincially to take full advantage of existing infrastructure. OFA supports urban intensification/densification as one way to protect agricultural land and create complete communities.

OFA believes that urban areas should only be allowed to expand onto abutting agricultural lands only after exhausting redevelopment of underused or vacant areas within their existing urban boundaries. This would include the rehabilitation and redevelopment of both “greyfield” and “brownfield” sites. Lastly, urban expansion onto abutting agricultural land must be directed onto lower class agricultural land adjacent to the existing urban boundaries.

OFA does not support scattered or strip development within prime agricultural areas. This form of development not only limits the ability of new and existing agricultural operations to function but fails to contribute financially to municipalities. OFA believes that urban expansion should only be permitted onto abutting agricultural lands where municipal sewer and water services are available.

OFA wants to see PPS policies in Section 1.1.3.8 remain as is. Keeping these policies intact (and holding municipalities and MMAH accountable to following these policies) is critical for meeting joint goals of balancing farmland protection with urban development.

Further, OFA wants to see Agricultural Impact Assessment (AIA) policies from APTG incorporated directly into the PPS policies on settlement area boundary expansions (APTG Policy 2.2.8.3 h). Specifically referencing AIAs as the current policy outlines:

“Where the need for a settlement area boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following: ... h) any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be

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avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;” (APTG Policy 2.2.8.3 h).

As Ontario becomes more urbanized, councils and staff may not apply an agricultural lens to their plan-, policy-, and decision-making. This is critical as we need to plan for 'farm-friendly' urban development that promotes compatibility at the urban-agricultural interface. For example, parcel size, configuration, building setbacks, road patterns, institutional locations, drainage patterns and location of municipal servicing will all have implications for agriculture.

OFA firmly believes in the widespread use of AIAs, as it ensures that *agricultural uses* continue and *normal farm practices* are protected. 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.

OFA would like to see the Ontario government create an independent, non-partisan Office of the Legislative Assembly to provide oversight of the municipal implementation of provincial land use plans and policies. We have seen ministerial authority used to amend Official Plans (with no ability to appeal) over the last few months, and this power was only strengthened with the amendments to Section 23 of the *Planning Act* and the passing of the *More Homes for Everyone Act, 2022*.

For example, several municipalities (e.g., Hamilton, Halton, and Waterloo) have created and adopted Official Plans within the last year that address housing supply and affordability within existing urban boundaries while protecting farmland. These Official Plans conformed with provincial policy. Yet, as of November 4, 2022, the Minister amended several Official Plans, adding 2,200 and 3,200 hectares of land (much of it prime farmland) into the urban boundaries of Hamilton and Halton, respectively. With overwhelming political and public support, these leading municipalities opted to keep firm boundaries to uphold and protect matters of provincial interest – such as providing safe, affordable housing while protecting farmland. Yet, the Minister overrode these decisions with no opportunity to appeal the decision. Ontario citizens deserve a transparent, accountable, and fair decision-making process with the opportunity to provide comments on approving and amending Official Plans.

Municipalities should be able to remedy their Official Plans according to their local community's interests, needs, and contexts. OFA requests the Ministry communicate with the public and the municipality in advance of amending an Official Plan should in the Minister's opinion the plan adversely affects a matter of provincial interest. Doing so should include reasons, concerns, detailed analyses, planning justification rationale, and the opportunity for municipalities to respond and remedy any concerns.

Creating an independent, non-partisan Office of the Legislative Assembly would address gaps in the municipal implementation of provincial planning policy by operating as an arm's length oversight and advisory function for municipalities. While the Minister plays this role to a certain extent as the approval authority for many plans, this Office would resolve differences between multiple Ontario Ministries and municipalities on land use planning policies and plans at the local level. This Office of the Legislative Assembly could 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.

2. Rural Housing

The consultation seeks, “policy direction that responds to local circumstances and provides increased flexibility to enable more residential development in rural areas, including rural settlement areas.”

OFA sees that opportunities to build more rural housing should be concentrated within, and directed to, *rural settlements* and *settlement areas* as identified in APTG Policy and PPS (2020) Policies 1.1 “*Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns*,” 1.1.3 “*Settlement Areas*,” 1.1.4 “*Rural Areas in Municipalities*.” Density and intensification targets should be analyzed and identified in accordance with APTG methodology and appropriately applied to *rural settlements* and *settlement areas*.

Within *rural lands*, OFA recommends that *agricultural uses*, *agriculture-related uses*, *on-farm diversified uses*, and *normal farm practices* should be protected and given higher priority as permitted uses under PPS (2020) Policy 1.1.5.2 and throughout Policy 1.1.5 “*Rural Lands in Municipalities*.”

More Homes Built Faster Act, 2022 strengthened 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 previously requested that this proposal be applied to rural and smaller-town municipalities within designated *rural settlements* and *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 increase density on parcels of land in the settlement area that are adequate for servicing and more efficiently contribute to the rural tax base.

Growth Management

1. **Population and Employment Forecasts**
2. **Intensification**
3. **Large and Fast-growing Municipalities**

APTG (2020) currently states, “To support the achievement of complete communities, this Plan establishes minimum intensification and density targets that recognize the diversity of communities across the GGH.” OFA wants to see the concepts and policies of minimum intensification and density targets included in APTG retained within the new APTG-PPS policy and applied across the province. OFA fully supports existing “*Policies for Where and How to Grow*” in Section 2.2 of APTG (2020) and would like to see these retained.

The consultation asks for “policy direction that enables municipalities to use the most current, reliable information about the current and future population and employment to determine the amount and type of housing needed and the amount and type of land needed for employment.”

Upper-tier municipalities are usually the entities responsible for the necessary studies and policy design to manage and allocate growth regionally and in a coordinated, sustainable, and integrated fashion. Yet, the *More Homes Built Faster Act, 2022* removed the planning responsibilities from several upper-tier municipalities, effectively downloading all previous authority and responsibility of the upper-tier to the lower-tier level. This is a move OFA continues to oppose and asks the government to reconsider given the APTG-PPS review.

It is unclear how the necessary planning will be undertaken to manage and allocate growth in these counties/regions with “without planning responsibilities.” We assume the Ontario government will assist lower-tiers with this work. For several reasons, OFA sees the removal of planning responsibilities from upper-tiers contradictory to the government’s goals to look for policy direction on growth management, and we ask the government to repeal their decision on the removal of regional planning authorities.

Upper-tier municipalities play critical planning functions in our communities, particularly for rural and small-town municipalities at the lower-tier level. Many of Ontario’s smaller rural municipalities have only one (1), half (0.5), or no (0) planners on staff⁷ (or even a department) to be able to plan for their communities sustainably. Many upper-tier municipalities (e.g., Counties of Huron, Oxford, Perth, Wellington, and more) provide planning services to their lower-tier counterparts on their behalf. Without upper-tiers to provide growth management planning services, we assume the government is willing incur the cost to undertake this work to assist lower-tiers. Otherwise, lower-tiers will have to undertake the work themselves, although they may not have the municipal resources to adequately complete this work. OFA worries that these changes to Ontario’s land use planning system will disproportionately impact rural municipalities as they may not have the capacity (e.g., staff, budgets, or expertise) to adopt these downloaded responsibilities, utilize new tools, and keep up with the pace of policy implementation, given the significant land use planning and legislation changes made over the past few years.

Even if lower-tier municipalities can undertake this work, it is unclear how these changes will improve community livability connected to core infrastructure in an integrated and coordinated way. OFA firmly believes that downloading all planning responsibilities and decisions at the local level will lead to uncoordinated decision-making resulting in scattered, inefficient, and piecemeal development that is expensive for municipalities to maintain and occurs at the expense of sound regional planning (such as dense, transit-supportive, complete communities that protect farmland and the agricultural sector). For example, the proposed amendments could have unintended consequences by having local planning disconnected from the servicing requirements that many upper-tier municipalities are responsible for managing and funding (such as infrastructure needed to support regional transportation systems). These consequences will have the *opposite* effect of getting more homes built faster, in ways that promote growth within existing urban boundaries.

Environment and Natural Resources

1. Agriculture

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 750,000 jobs and contributing over \$47 billion to

⁷ Caldwell, W., Geschiere, E., Sousa, E.C., and Zink, R. “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>.

Ontario's annual GDP. 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 provincial policies and legislation are used to pave over farmlands. Their ability to feed our province and economy relies on knowing that encroaching development will be limited and not hinder their ability to farm and remain viable into the future.

The consultation seeks “policy direction that provides continued protection of prime agricultural areas and promotes Ontario's Agricultural System, while creating increased flexibility to enable more residential development in rural areas that minimizes negative impacts to farmland and farm operations.”

In considering our upcoming comments with respect to agriculture, OFA notes that the protection of our valuable, finite, essential, and non-renewable agricultural lands is our top priority.

The following comments are what OFA considers to be “must-haves” to be included within the revised APTG-PPS policy document:

a) Revising definitions of *prime agricultural lands* and *prime agricultural areas*

As our agricultural land base shrinks with losses of 319 acres of farmland a day, it is as important than ever to afford protections from development to all farmable lands. OFA believes that *prime agricultural lands* should be defined as Canada Land Inventory (CLI) Class 1, 2, 3, and 4 lands and *specialty crop areas*. Where Class 1-4 soils are not present in a county or region, the best agricultural lands in that county or region should be recognized and protected for their agricultural use.

As a result, OFA would like to see the definition of *prime agricultural lands* amended to read: “means *specialty crop areas* and/or Canada Land Inventory Class 1, 2, 3, and 4 lands, as amended from time to time, in this order of priority for protection.”

Further, OFA wants the definition of *prime agricultural area* to reflect this minor change but otherwise remain the same:

Prime agricultural area: means where prime agricultural lands predominate. This includes areas of prime agricultural lands and associated Canada Land Inventory Class 5 through 7 lands, and additional areas where there is a local concentration of farms which exhibit characteristics of ongoing agriculture. ... (p. 49).

CLI class 5-6 soils that are part of an ongoing agricultural operation deserve protection too. These soils can support agricultural activities such as grazing livestock or growing crops for biofuels, and their productivity can be improved through activities such as tile drainage, stone picking, and/or the addition of lime.

b) Section 2.3 Agriculture – Protection of Prime Agricultural Areas

PPS (2020) Policies 2.3.1 and 2.3.2 outline policies for the protection of *prime agricultural areas*, the designation of *prime agricultural areas* and *specialty crop areas* by planning authorities. OFA wants these policies to remain intact.

c) Section 2.3.3 Permitted Uses Policies

Section 2.3.3 further outlines policies for Permitted Uses in the *prime agricultural area*, including *agricultural uses*, *agriculture-related uses*, and *on-farm diversified uses*. These policies have worked well for balancing the protection of farmland with economic opportunities for Ontario's farmers and OFA wants these policies to remain intact.

OFA notes that the PPS (2020) definition for *on-farm diversified uses* “means uses that are secondary to the principal agricultural use of the property, and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, and uses that produce value-added agricultural products. Ground-mounted solar facilities are permitted in prime agricultural areas, including specialty crop areas, only as on-farm diversified uses.”

OFA would like to see this last statement regarding ground-mounted solar facilities as a permitted on-farm diversified use moved to the permitted uses policy section of the PPS, with additional policy wording ensure the agricultural land must remain farmed and/or co-exist with ground-mounted solar, as well as direct rooftop solar and ground-mounted solar in areas of marginal farmland and/or are not capable of production (e.g., scrub land).

OFA recommends including land and facilities occupied by an agricultural society or a tenant of an agricultural society, as a permitted *agricultural use*. As stated in the *Agricultural and Horticultural Organizations Act*, the “objects of an agricultural society are to encourage an awareness of agriculture and to promote improvements in the quality of life of persons living in an agricultural community...”. To best carry out its mandate, OFA believes an agricultural society needs to be located within the agricultural community it serves.

d) Agricultural System

The Agricultural System (AgSyst) identifies and protects the agricultural land base across municipalities, while recognizing that planning and economic development should be coordinated to enable the agri-food sector to thrive alongside rapidly growing communities and infrastructure.

The AgSyst has two components to support a viable, thriving agri-food sector: an agricultural land base comprised of *prime agricultural areas*, including *specialty crop areas*, and *rural lands* that together create a continuous productive land base for agriculture; and an *agri-food network* which includes elements important to the viability of the agri-food sector, such as regional infrastructure, on-farm buildings, agricultural services, distributors, and processors.

The government has committed to making rural Ontario and Ontario's agri-food sector open for business, investment and jobs. *Grow Ontario: a provincial agri-food strategy* (Grow Ontario) was recently announced with the aim to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable and responsive food supply for Ontarians. The agri-food sector is a significant economic contributor, poised for growth. The AgSyst is one policy tool the government can use to achieve this goal.

Using the AgSyst policy tool enables our agri-food sector to continue to be the “*cornerstone of our thriving economy*” as identified in Grow Ontario.⁸ If the provincial government wishes to ‘ensure that consumers have access to safe, nutritious, homegrown food, now and in the future,

⁸ Grow Ontario: a provincial agri-food strategy (2022). <https://www.ontario.ca/page/grow-ontario-provincial-agri-food-strategy>.

and to ensure long-term, sustainable economic development of the agri-food sector, we need to protect agricultural land and the agri-food network.

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 the development and implementation of the AgSyst as an innovative and responsible land use planning approach over the last few years. We firmly believe that its inclusion improves the prospects for protection of agricultural lands, and the agri-food assets and infrastructure that primary agricultural production relies upon. Also, this provincial approach promotes consistency in protecting and enabling agricultural growth and business across municipal boundaries.

OFA sees that APTG (2020) Section 4.2.6 Agricultural System policies must be retained in the review of APTG-PPS. The language in this section uses the words “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 recommends that application of the AgSyst be made mandatory.

OFA wants to see the AgSyst mapped, and its policies applied, protected, and enabled provincially. OFA supports the provincial mapping of the Agricultural Land Base, including identification of Candidate Areas for inclusion in the Agricultural Land Base. OFA requests that the government continue to review and update mapping upon a municipal request, as not all municipalities will have the capacity to undertake this work.

e) Section 2.3.3.3 – Minimum Distance Separation (MDS)

OFA sees Minimum Distance Separation (MDS) as an essential component of responsible land use planning that must continue to be in the revised APTG-PPS instrument. OFA maintains that both PPS (2020) Policy 2.3.3.3, requiring new land uses in *prime agricultural areas*, and Policy 1.1.5.8 requiring new land uses in *rural areas*, including the creation of lots and new or expanding livestock facilities, must continue to comply with MDS Formulae. It should be made explicit in PPS policies that MDS will apply to existing and new livestock operations, manure storages, and anaerobic digestors using manure as an input.

OFA supports MDS, its rationale being to prevent encroachment by neighbouring non-agricultural uses on livestock farms by providing sufficient separation between livestock uses and buildings and neighbouring non-agricultural uses and buildings to lessen the likelihood of complaints about *normal farm practices* (e.g., odour, noise, flies, dust). OFA also endorses the MDS formulae (MDS I and MDS II) to provide sufficient separation between new or expanding agricultural livestock buildings and uses and neighbouring non-agricultural buildings and uses, again to lessen the likelihood of odour and noise complaints (or other *normal farm practices*). Science-based setback distances are implemented through Nutrient Management legislation when agricultural source materials, like manure, are applied to agricultural land to grow crops, with the intent of lessening odour impacts to neighbouring properties. It is logical to apply a separation distance from the generation and storage of nutrient materials, where odours may be concentrated, to lessen the impact on neighbours while protecting the farmers who grow our food.

Without MDS, more nuisance complaints and hearings requested at the Normal Farm Practices Protection Board may occur, bringing more red tape and economic inefficiency for municipalities and farm operations alike. OFA wants to remind MMAH that MDS not only protects farmers but

protects homeowners and businesses too, who may not appreciate the encroaching noise and smell from neighbouring farm operations.

OFA emphasizes that MDS, in principle and when calculated correctly, works in the interest of farmers and non-farmers. However, our members have consistently come across instances where MDS setbacks were calculated incorrectly, therefore permitting development too close to a farm operation, leading to compatibility issues and further prohibiting farmers from expanding their operations in the future. As a policy tool, MDS is valuable, but further investment in its implementation is needed, specifically the requirement for planners calculating MDS to be trained and competent.

Further, with the removal of third-party planning appeals for many *Planning Act* applications at the Ontario Land Tribunal (OLT), farmers no longer have an avenue to appeal planning decisions where MDS were calculated incorrectly. OFA recommends that the government retain MDS as a critical tool to support compatible development and ensure its implementation is accurate and sufficiently resourced. We also continue to advocate for third-party appeals for municipal approvals that may have been issued in error.

f) New Policy Wording on On-Farm Accommodations for Labour

OFA wants to see an additional policy added to Section 2.3 Permitted Uses in the PPS. We request the following be added to clarify that on-farm accommodations for labour be permitted as an agricultural use, in accordance with PPS (2020) definitions and provincial guidance (i.e., OMAFRA Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas):

“2.3.3.4 In prime agricultural areas, accommodation for full-time farm labour is permitted, when the size and nature of the operation requires additional employment. Accommodations for full-time farm labour must be permitted in accordance with provincial guidance.”

OFA urges the Ontario government to enforce on-farm accommodations for labour as an agricultural use in the PPS and to devote more attention to farm labour residences in the plan to build more homes faster. 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, these housing requirements can range from simple trailers, to repurposing surplus houses to larger bunkhouse accommodations. Despite PPS definitions of *agricultural uses*, 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 as permitted uses in Official Plans or from their definitions of *agricultural uses* in their Zoning By-laws and are subjecting uses to several planning applications – a much lengthier and costlier approval process for much needed housing in the agricultural industry.

Farm 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, that land taken out of production is minimized (such as locating accommodations within the farm building cluster), and that severances for such residences are prohibited. Enhanced training on the Guidelines for Permitted Uses in Ontario's Prime Agricultural Areas (2016) for

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municipalities would be of benefit to ensure consistent interpretation and implementation of provincial guidance on accommodations for farm labour.

g) Section 2.3.4 Lot Creation and Lot Adjustments

Previous consultations on addressing rural housing needs (ERO #019-5287) have explicitly looked for policy direction on “*lot creation in agricultural areas*.” OFA supports the current lot creation policies under Section 2.3.4.1 of the PPS (2020) as written.

OFA is opposed to any re-introduction of lot creation policies in the agricultural area that may resemble policies in previous versions of the PPS. 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.

Policies permitting these residential lots were removed from the PPS in 2005 for a reason, and this was a change 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.

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.

Inserting non-agricultural uses in general, and particularly non-agricultural residential uses, into a prime agricultural area, is detrimental to the surrounding agricultural operations. Non-agricultural land uses tend to bring increased nuisance complaints about agricultural odours, noises, dust, flies, chemical applications, sharing of the road with slow-moving farm machinery, and more from normal farm practices.

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.⁹ This policy move can effectively sterilize important farmland, create conflicts later, and introduce incompatible uses in the long term.

OFA recognizes 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 and would like to see additional emphasis placed on these tools within the revised APTG-PPS policy document.

⁹ 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>.

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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 government work more closely with municipalities to encourage broader use of garden suites through awareness of section 39.1 of the *Planning Act*, and to encourage their use in the APTG-PPS instrument.

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.

OFA also notes that the *More Homes Built Faster Act, 2022* now prevents third-party appeals for consent ('severance') applications at the OLT. OFA shared its opposition to the removal of third-party planning appeals altogether and urged the Ontario government to look for alternative options to address the backlog of appeals and streamline processes at the OLT. The OLT has been an essential mechanism for many of our members to appeal and resolve disputes related to land use matters as they pertain to their farm properties, operations, and agriculture more broadly. With new or reintroduced severance policies, Ontario farmers will have no mechanism to appeal decisions impacting their farm operations. For example, several of our members have relied on third-party appeals concerning incorrect MDS calculations, resulting in development too close to livestock operations and prohibiting farmers from expanding in the future.

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. 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.

h) Section 2.3.5 Removal of Land from Prime Agricultural Areas

Reiterating our above comments provided under "Settlement Area Boundary Expansions," OFA wants to see PPS policies in Section 2.3.5 (and by virtue of Section 2.3.5, policies in Section 1.1.3.8) remain as written. Keeping these policies intact (and holding municipalities and MMAH accountable to following these policies) is critical for balancing goals of farmland protection with urban development.

The PPS (2020) is currently silent when it comes to explicitly requiring an AIA for the removal of land from *prime agricultural areas*. AIAs are mandatory under current APTG (2020) policies with respect to settlement area boundary expansions, mineral aggregate operations, and infrastructure projects in *prime agricultural areas*. OFA wants to see these required and mandatory AIA policies in APTG (2020) be retained in the APTG-PPS policy instrument. We also see that AIAs should be required for all other non-agricultural uses in *prime agricultural areas*.

i) Section 2.3.6 Non-Agricultural Uses in Prime Agricultural Areas

OFA believes that in prime agricultural areas, the only permitted uses should be *agricultural uses*, *agriculture-related uses*, and *on-farm diversified uses*.

We believe that in prime agricultural areas, recreational uses should be prohibited. We define “recreational uses” as conservation areas, provincial parks, public parks, golf courses and amusement parks. We view riding stables as agricultural uses.

OFA believes that all other forms of industrial and commercial development are best located within existing industrial and commercial zones within urban settlement boundaries. Keeping non-farm uses out of agricultural areas decreases infrastructure costs, reduces conflicts over slow-moving farm vehicles on roads and protect normal farm practices and minimizes nuisance complaints, otherwise triggering hearings to the Normal Farm Practices Protection Board.

As a result, we request that PPS (2020) criteria for justifying non-agricultural uses of prime agricultural areas under Section 2.3.6 remain as written, apart from clarifying in 2.3.6.2 that “impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands are to be mitigated to the extent feasible, as determined through an Agricultural Impact Assessment.”

As mentioned before, the PPS (2020) is currently silent when it comes to explicitly requiring an AIA for the removal of land from *prime agricultural areas*. AIAs are mandatory under current APTG (2020) policies with respect to settlement area boundary expansions, mineral aggregate operations, and infrastructure projects in *prime agricultural areas*. OFA wants to see these required and mandatory AIA policies in APTG (2020) be retained in the APTG-PPS policy instrument. We also see that AIAs should be required for *all* other non-agricultural uses in *prime agricultural areas*.

j) Revising the PPS Definition of “Development”

Currently in the PPS (2020), *development* means:

the creation of a new lot, a change in land use, or the construction of buildings and structures requiring approval under the *Planning Act*, but does not include:

- a) activities that create or maintain *infrastructure* authorized under an environmental assessment process;
- b) works subject to the *Drainage Act*; or
- c) for the purposes of policy 2.1.4(a), underground or surface mining of *minerals* or advanced exploration on mining lands in *significant areas of mineral potential* in Ecoregion 5E, where advanced exploration has the same meaning as under the *Mining Act*. Instead, those matters shall be subject to policy 2.1.5(a) (p. 42).

OFA sees that the definition of *development* should be expanded to include a clause stating that “the full range of agricultural uses (as defined in the 2020 PPS) do not constitute as *development*.”

2. *Natural Heritage*

When comparing Natural Heritage policies between APTG (2020) and the PPS (2020), OFA prefers Natural Heritage policies under Section 2.1 in the PPS (2020). Natural Heritage System (NHS) policies in APTG (2020) have introduced red tape for our members with the requirement for costly environmental impact studies and the requirement to retain buffers from features, which further push development onto farmland and contribute to farmland loss and inefficient use of land for farming.

OFA believes that natural heritage designations should only apply to the features and areas themselves and not be broadly applied to include vast areas of prime agricultural land as some municipalities have done. Natural heritage features are scattered across our agricultural landscapes. They are not the totality of the landscape. We believe that significant natural heritage features merit protection from incompatible development, similar to the protection of *prime agricultural areas* from incompatible development.

We further believe that PPS Policy 2.1.9 succinctly speaks to the relationship between natural heritage features and areas and agricultural lands; “nothing in policy 2.1 [Natural Heritage] is intended to limit the ability of agricultural uses to continue”, and we expect this policy to be universally applied and complied with.

Natural Heritage features and areas need connecting links to maintain their viability long-term. OFA endorses the Natural Heritage Reference Manual’s perspective that open agricultural fields serve as links, while also remaining agricultural fields dedicated to agricultural uses (sections 2.3.2 and 3.4.5). Formal designation of connecting links only occurs when these agricultural lands are re-designated to an urban use.

OFA cannot underestimate the importance of ground truthing as a mandatory requirement in the identification and designation of natural heritage features. Too often, man-made features important to the everyday functioning of agricultural areas, including (but not limited to) drainage ditches, drainage ponds, hedgerows, fence lines, agricultural swales, woodlots, and windbreaks, as misidentified as key natural heritage features. On-the-ground verification must be a key stage in the natural heritage identification/assessment/designation process. Incumbent in this process are criteria that ensure that features that are not natural heritage features, are not incorrectly identified, assessed and finally designated as natural heritage features. For example, created wetlands in the farm context to treat agricultural/barnyard runoff, milkhouse wash water etc., along with farm ponds dug as a source of water for irrigation or livestock, agricultural drainage ditches, or even broken field tile drains, must not be classified as a wetland. Guaranteeing that only bona fide natural heritage features are so identified will demonstrate a commitment to accuracy which will improve landowner buy-in. This also highlights the importance of the timing of visits. For example, timely visits would ensure that simply ‘wet lands’ are not erroneously classified as wetlands.

OFA believes municipalities and relevant ministries should be required to notify landowners and tenants that an evaluation is being undertaken on their property. It is also very important to notify a farmer who is leasing a property where applicable – not just the landowner. Similar permission must also be obtained by the landowner and farmer leasing property (where applicable) prior to accessing private property. This is extremely important when working on or near agricultural properties due to potential biosecurity and safety protocols that may be in place. Ground truthers

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and any other persons assisting with verification during field visits must strictly abide by all relevant biosecurity and health and safety protocols in place on any farm.

We believe any landowners with newly applied designations of natural heritage features be notified in writing before the official designation comes into effect. Notification should also be provided to any potentially impacted landowner and tenant which may include neighbours who could be impacted by buffers or species-at-risk restrictions, that do not necessarily respect property boundaries. It is also essential that both landowners, tenants and neighbours receive notification before the feature has been designated in the Official Plan. OFA strongly recommends that instances of decisions being made by the municipality to designate a feature must be clearly detailed in all documentation and include factors and/or assumptions that may be considered to reach that decision. We also view a local appeals committee to hear concerns or regarding natural heritage designations be a necessary and required component to help adjudicate matters related to the identification and designation of natural heritage features.

OFA wants to see the definition of *wetlands* remain the same in the PPS (2020). The PPS (2020) definition specifies that “periodically soaked or wet lands being used for agricultural purposes which no longer exhibit wetland characteristics are not considered wetlands for the purposes of this definition” (p. 53). We view that every other piece of provincial legislation and policy referencing *wetlands* should refer to the PPS (2020) definition. Further, OFA believes that the existing PPS (2020) definition of *wetlands* must add another clause that explicitly states that the *wetlands* definition also does not include:

- wetlands created for wastewater or stormwater,
- excavated ponds (including those created for watering livestock and/or irrigation ponds),
- wetlands within agricultural drainage ditches and drains constructed under the *Drainage Act*,
- wetlands that develop as the unintended consequence of agricultural development, and
- wetlands created on farms for agricultural purposes (including to treat barnyard runoff, milk house wash water, for tile drain outlets).

We also ask the government to consider our comments in addition to our response to ERO #019-6160 on Proposed Updates to the Ontario Wetland Evaluation System.

3. *Natural and Human-made Hazards*

Respecting our comments to provide “streamlined and clarified policy direction for development in hazard areas, while continuing to protect people and property in areas of highest risk,” OFA asks that MMAH review our submission to ERO #019-2927 (Proposed updates to the regulation of development for the protection of people and property from natural hazards in Ontario).

4. *Aggregates*

OFA believes that agricultural activities make the best use of arable lands and that the productivity of those lands must be maintained. Aggregate extraction should be prohibited on prime agricultural land (classes 1-4), and specialty crop lands. OFA recognizes the importance of aggregates for upgrading and maintaining our networks of roads and bridges, as well as for residential, commercial, institutional, industrial, and even agricultural construction. OFA insists

that after aggregate extraction lands must be fully rehabilitated in a timely manner. We would like to see a stronger commitment to rehabilitation embedded in the PPS, with measurable and achievable goals and objectives for the rehabilitated area, and timelines around these goals and objectives.

Community Infrastructure

1. Infrastructure Supply and Capacity

OFA believes that developers, not local taxpayers, should pay for the cost to service new development. Any changes to how critical infrastructure such as water distribution, wastewater or storm water services is provided to new development must not increase the property tax burden of existing property owners. Please see our comments on ERO #019-6172 in response to the *More Homes Built Faster Act, 2022* for more detail.

OFA sees that social service infrastructure needs to be considered along with hard infrastructures like roads and water management systems. Equitable and timely access to high-quality health care and emergency services must be part of the long-range integrated infrastructure planning, particularly as access to health care is an essential pillar of rural economic development and community livability. Access must include physical structures such as hospitals and EMS services such as ambulances and adequate access to healthcare professionals (e.g., doctors, nurses, and paramedics) to meet the population's needs. OFA stresses the importance of targeting and investing in infrastructure supply and capacity across all public sectors to enable growth that supports strong and vibrant communities, beyond just writing these into provincial land use policy that focuses on housing.

2. School Capacity

We require access to various affordable services and infrastructure to keep farm families on the farm and maintain their substantial contributions to the economy. These services and infrastructure include our urban and rural schools. Schools play a critical role in rural communities. Not only are the schools where our children spend a large portion of their days being educated, but they are also our children's playgrounds, adult learning centres, childcare centres, community centres, recreational facilities, and meeting halls.

Physical school(s) and their proximity to the local community are essential considerations in children's education. Many rural students are bussed far distances to attend school located in an urban area. These facilities must be within a reasonable distance of children's homes. Without them, quality of life declines, and it becomes challenging to attract and retain the population, support a viable economic base, and promote 'complete communities' in rural areas. The educational needs of rural residents outside of the urban boundary/settlement area mustn't be sacrificed to accommodate the anticipated increased population across Ontario. All our children deserve an equitable, high-quality opportunity for education regardless of where they live.

Streamlined Planning Framework

- 1. Outcomes-Focused**
- 2. Relevance**
- 3. Speed and Flexibility**

The proposal outlines that the APTG-PPS instrument should be “outcomes-focused” and streamlined (e.g., requiring fewer studies), have “relevance” focusing on key land use planning matters listed in the consultation, such as housing, and provide “speed and flexibility” to municipalities (reduce complexity and increase flexibility to enable faster municipal implementation of policy).

OFA supports the proposal to remove or streamline policies that result in duplication, delays or burden in the development of housing – this should never occur anywhere within the land use planning system. However, the necessary studies completed should still be comprehensive in their analysis of impacts and remedial measures; choosing which requirements should be modified or eliminated cannot be done in a short-sighted manner. For example, some requirements for planning approvals, such as MDS, AIAs, and floodplain regulations, are important measures to ensure the health, safety, and compatibility of housing developments near the agricultural area. Some of these policy requirements are important and should remain untouched, as they help promote and achieve good planning outcomes that protect homeowners and farmers alike in both short and longer terms. Some tools are more comprehensive than others; for example, AIAs cover many components that may be included in other studies (e.g., Environmental Impact Studies), and could be viewed as a streamlined yet comprehensive study alternative.

OFA sees that the “Analysis of Regulatory Impact” provided in the consultation does not accurately reflect the ability to achieve these core proposed principles in the new APTG-PPS instrument in a short timeframe. Given the number of consultations and provincial legislative and policy changes to ‘build more homes faster’ over the last few months, OFA asks the Ontario government provides a period of policy stability in land use planning once upcoming changes are in place.

We understand the government is looking to ‘reduce red tape’ to get more homes built faster. However, we urge the government to recognize that frequent provincial reviews and changes to plans and policies are a barrier to new housing development. Municipal capacity is limited and lags when adopting changes to provincial plans. Arguably, since 2017, many municipalities across Ontario have not had the chance to catch up with provincial policy as the Growth Plan for the Greater Golden Horseshoe was amended in 2017, then further amendments were made in 2019 and again in 2020, alongside the release of the PPS (2020). Municipalities have not had a chance to conform to the previous changes as well as it delayed the process as many municipalities had to redo studies and planning work.

These changes have disproportionately impacted rural communities that do not have the capacity to implement and 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 staff – with limited resources, municipalities have not been able to dedicate the time to invest in their policy work. The Auditor General of Ontario noted in December 2021 that “numerous changes in policies have created instability in the land use planning process,” in addition to having wasted the limited resources of municipalities over the recent years. As a result, OFA worries rural municipalities will be left

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behind in the provincial legislative push for more housing as they continuously try to 'catch up' on the legislative and policy changes. OFA urges the MMAH to ensure any further changes to support housing at the provincial level have been analyzed from a rural-municipal perspective. We also ask MMAH to provide the necessary support, such as additional time, funding, training, and expertise, to municipalities to enable them to utilize and implement these new legislative and policy instruments to their benefit. OFA recommends the Ontario government financially assist municipalities in achieving these requirements and that the 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.

OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the review of A Place to Grow and Provincial Policy Statement. 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 Ontario'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
The Honourable Graydon Smith, Minister of Natural Resources and Forestry
OFA Board of Directors