

May 10, 2024

Provincial Land Use Plans Branch  
Ministry of Municipal Affairs and Housing  
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Toronto, ON M7A 2J3

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

Dear Ministry of Municipal Affairs and Housing Officials:

**RE: Review of proposed policies for a new provincial planning policy instrument  
(ERO #019-8462)**

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are 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.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs, and contributing over \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth, and ensure an efficient, reliable, and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to drive the economy forward.

OFA appreciates this opportunity to provide input to ERO #019-8462 Review of proposed policies for a new provincial planning policy instrument 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.

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## Summary of key OFA Recommendations:

1. OFA thanks the government for updating the proposed Provincial Planning Statement (proposed PPS2024) to include the following recommendations made by OFA:
  - a) To not carry forward previously proposed policies that would have permitted the creation of three additional residential lots per parcel in prime agricultural areas;
  - b) To permit more housing on farms to support farmers and farm families without creating new lots, through enhanced policy and criteria supporting additional residential units;
  - c) Require planning authorities to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base; and
  - d) State that impacts from any new or expanding non-agricultural uses on the agricultural system, or where avoidance is not possible, are to be minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.
2. OFA recommends explicitly stating that only one new residential lot may be created in a prime agriculture area per farm consolidation in the case of the severance of a residence surplus to an agricultural operation and that the new residential lot must include the surplus residential dwelling and any associated additional residential units.
3. OFA recommends revising the meaning of “prime agricultural lands” to include soil class 4 farmland, and adding the meaning of “farm consolidation”, in the definitions section of the PPS.
4. OFA recommends developing and releasing provincial guidance with respect to:
  - a) Additional Residential Units located on a lot in a Prime Agricultural Area, including application of Minimum Distance Separation (MDS);
  - b) Lot creation in prime agricultural areas;
  - c) Agricultural Impact Assessments; and
  - d) Required information for the implementation of the Agricultural System approach including mapping.
5. OFA recommends a greater emphasis be placed on intensification and redevelopment by setting fixed urban boundaries and mandating planning authorities to meet significant minimum targets for intensification and redevelopment within built-up areas.
6. OFA recommends that no settlement area boundary expansions be permitted unless all established minimum requirements for intensification and redevelopment within the existing built-up area have been met. When identifying a new settlement area or allowing a settlement area boundary expansion, OFA recommends that planning authorities be required to demonstrate that criteria were considered, including:
  - a) whether the applicable lands comprise specialty crop areas;
  - b) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, demonstrate reasonable alternatives on lower priority agricultural lands in prime agricultural areas were considered;
  - c) whether the new or expanded settlement area complies with the minimum distance separation formulae; and
  - d) whether impacts on surrounding agricultural operations and lands as well as the agricultural system are avoided, or where avoidance is not possible, minimized and

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mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

OFA views the updated proposed Provincial Planning Statement (proposed PPS2024) as an important statement with respect to land-use planning in Ontario. The proposed PPS2024 is intended to replace both the Provincial Policy Statement 2020 (PPS2020) and the A Place to Grow plan (APTG). Given planning decisions made by planning authorities are to be consistent with provincial policy statements and confirm to provincial plans, getting the proposed PPS2024 right is of utmost importance.

As stated in PPS2020, and reiterated in the proposed PPS2024, policies contained in the policy statement represent minimum standards. “Within the framework of the provincial policy-led planning system, planning authorities and decision-makers may go beyond these minimum standards to address matters of importance to a specific community, unless doing so would conflict with any policy of this Policy Statement.” (Page 3, proposed PPS2024).

OFA applauds planning authorities and decision-makers that have gone beyond the stated minimum standards to do more to protect the agricultural land base for the long-term use for agriculture.

OFA also wishes to thank the government for updating the proposed PPS2024 to include OFA’s earlier recommendations provided in response to past consultations. Specifically, we are thankful the government has agreed to not carry forward previously proposed policies that would have permitted the creation of three additional residential lots per parcel in prime agricultural areas. We supported permitting more housing on farms to support farmers and farm families without creating new lots, through enhanced policy and criteria supporting additional residential units. We are pleased our recommendations to require planning authorities to use an agricultural system approach and to require agricultural impact assessments when the impacts on the agricultural system cannot be avoided were included in the proposed PPS2024.

We ask that the government confirm that additional residential units in prime agricultural areas would be permitted within the Greenbelt area. We believe that having the ability to add additional residential units to farms parcels located in the Greenbelt area would be of benefit to those agricultural operations.

Although additional residential units may in some instances be used to provide housing for farm workers, OFA requests that the government ensure that planning authorities understand that bunkhouses for farm workers are not residential units but instead are included in the Agricultural Uses definition in the proposed PPS 2024.

To aid in implementation of these new measures, OFA recommends developing and releasing provincial guidance with respect to:

1. Additional Residential Units located on a lot in a Prime Agricultural Area, including application of Minimum Distance Separation (MDS);
2. Lot creation in prime agricultural areas;
3. Agricultural Impact Assessments; and
4. Required information for the implementation of the Agricultural System approach including mapping.

Guidance documents aid in ensuring provincial government direction is implemented by planning authorities consistently across Ontario. OFA and other stakeholders have knowledge of situations where consistency is lacking. OFA looks forward to sharing our knowledge of these situations and providing additional input during the development of these guidance documents.

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## New Settlement Areas and Settlement Area Boundary Expansions (Policy 2.3)

OFA recommends a greater emphasis be placed on intensification and redevelopment by setting fixed urban boundaries and mandating planning authorities to meet significant minimum targets for intensification and redevelopment within built-up areas.

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. While not prohibiting development in prime agricultural areas directly, the PPS2020 and APTG aim to facilitate the densification and intensification of urban areas.

Urban intensification and redevelopment efforts contribute to protecting Ontario's agricultural land base. OFA supports including urban intensification and redevelopment policies in the proposed PPS2024 that apply to all Ontario municipalities, not just those municipalities currently subject to the APTG. In fact, OFA would like to see these "Growth Plan level" policy requirements implemented and strengthened in the proposed PPS2024.

OFA believes mandatory and enforceable density targets must be applied in large urban settings and for new greenfield development. OFA requests that the proposed PPS2024 mandate an intensification rate of 70% and we request setting a minimum of 85 people and jobs per hectare to have the greatest effect towards preserving productive agricultural lands in Ontario.

As noted in the PPS2020 and the proposed PPS2024, some "policies use enabling or supportive language, such as "should," "promote" and "encourage." The choice of language is intended to distinguish between the types of policies and the nature of implementation. There is some discretion when applying a policy with enabling or supportive language in contrast to a policy with a directive, limitation or prohibition." Therefore, OFA recommends the following language be revised.

Specifically, OFA recommends:

**In Policy 2.1.4.a) and b)**, reinserting "residential intensification and redevelopment" requirements as originally stated in PPS2020: 1.4.1.a) and b).

**In Policy 2.3.1.4**, replacing "Planning authorities are encouraged to establish and implement minimum targets for intensification and redevelopment with built-up areas, based on local conditions" with the language noted in PPS2020's Policy 1.1.3.4: "Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions. However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas."

**In Policy 2.3.1.5**, replacing "Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas." with "Planning authorities shall establish density targets for designated growth areas, based on local conditions. Large and fast-growing municipalities shall plan for at least a target of 50 residents and jobs per gross hectare in designated growth areas. However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas."

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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 provincewide to take full advantage of existing infrastructure. OFA supports urban intensification/densification to protect agricultural land and create complete communities.

OFA requests that a Municipal Comprehensive Review (MCR) be required for any settlement boundary expansion as per the requirements under PPS2020.

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.

In terms of fixing urban boundaries, the policies of the current PPS2020 are inadequate. The expansion of Settlement Areas resulting in the loss of Ontario’s agricultural land base has continued unabated. OFA believes the proposed PPS2024 could make a significant step towards protecting Ontario’s agricultural land base by revising the policies regarding New Settlement Areas and Settlement Area Boundary Expansions. OFA strongly believes municipalities should be required to meet urban intensification and density targets.

OFA recommends requiring that no settlement area boundary expansion shall be permitted unless significant minimum requirements for intensification and redevelopment within the existing built-up area have been met.

Specifically, OFA recommends:

**In Policy 2.3.2.1**, replacing “In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following: ...” with “No settlement area boundary expansions shall be permitted unless all established minimum requirements for intensification and redevelopment within the existing built-up area have been met. In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall demonstrate that criteria were considered, including: ...”

**In policy 2.3.2.1.d)**, replacing “the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;” with “the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, demonstrate reasonable alternatives on lower priority agricultural lands in prime agricultural areas were considered;”

**In Policy 2.3.2.1.f)**, replacing “whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and” with “whether impacts on surrounding agricultural operations and lands as well as the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to

the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and”

### **Water (Policy 4.2)**

OFA is concerned with the proposed expansion of Planning Authority responsibilities over drinking water supplies. Under the PPS2020, Planning Authorities shall protect, improve or restore the quality and quantity of water by implementing necessary restrictions on development and site alteration to protect all municipal drinking water supplies. The proposed PPS2024 would not limit this requirement to just municipal drinking water supplies. It is unknown what restrictions a Planning Authority may decide are necessary with respect to a private water well.

Specifically, OFA recommends:

**In Policy 4.2.1.e).1**, replacing “protect drinking water supplies and designated vulnerable areas;” with “protect all municipal drinking water supplies and designated vulnerable areas;” (as originally stated in PPS2020)

### **Agriculture (Policy 4.3)**

OFA continues to request the inclusion of Canada Land Inventory Class 4 soils in the definition of *prime agricultural lands*.<sup>1</sup> Such a definition revision would mean that all Soil Class 4 farmland is included in the Prime Agricultural Area definition, not just Soil Class 4 farmland that is associated with areas of Soil Class 1, 2, 3 farmlands and/or specialty crop areas.

Specifically, OFA recommends:

**In Definitions (Chapter 8)**, revise the definition of Prime Agricultural Land from: “Prime agricultural land: means specialty crop areas and/or Canada Land Inventory Class 1, 2, and 3 lands, as amended from time to time, in this order of priority for protection.” to “Prime agricultural land: 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.”

**In Definitions (Chapter 8)**, revise the definition of Prime Agricultural Area from “Prime agricultural area: means areas where prime agricultural lands predominate. This includes areas of prime agricultural lands and associated Canada Land Inventory Class 4 through 7 lands, and additional areas with a local concentration of farms which exhibit characteristics of ongoing agriculture. Prime agricultural areas may be identified by a planning authority based on provincial guidance or informed by mapping obtained from the Ontario Ministry of Agriculture, Food and Rural Affairs” to “Prime agricultural area: means areas 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 with a local concentration of farms which exhibit characteristics of ongoing agriculture. Prime agricultural areas may be identified by a planning authority based on provincial guidance or informed by mapping obtained from the Ontario Ministry of Agriculture, Food and Rural Affairs.”

**In Policy 4.3.1.3**, revise “Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, and 3 lands, and any associated Class 4 through

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<sup>1</sup> For context, the Government of Ontario’s 1978 Food Land Guidelines – A policy statement of the Government of Ontario on Planning for Agriculture stated that “On a provincial basis ... high priority agricultural lands include ... All lands where soils Classes 1,2, 3, and 4 predominate as defined in the Canada Land Inventory of Soil Capability for agriculture.”



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7 lands within the prime agricultural area, in this order of priority.” to state “ Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, 3, and 4 lands, and any associated Class 5 through 7 lands within the prime agricultural area, in this order of priority.”

As previously mentioned, OFA appreciates the permitting of up to two additional residential units on a lot in a prime agricultural area in accordance with criteria and provincial guidance. To address confusion as to how additional residential units are treated in the case of a severance of a residential surplus to an agricultural operation due to farm consolidation, OFA recommends explicitly stating that only one new residential lot may be created in a prime agriculture area per farm consolidation in the case of the severance of a residence surplus to an agricultural operation and that the new residential lot must include the surplus residential dwelling and any associated additional residential units.

OFA further recommends stating the meaning of “farm consolidation” in the definitions section of the proposed PPS2024. OFA is aware that various planning authorities have applied different interpretations as to what constitutes a “farm consolidation”. A definition would assist planning authorities in their effort to be consistent with the proposed PPS2024.

Specifically, OFA recommends:

**In Policy 4.3.2.5**, replacing “Additional residential units may only be severed in accordance with policy 4.3.3.1.c)” with “In accordance with policy 4.3.3.1.c, only one new residential lot may be created in a prime agriculture area per farm consolidation in the case of the severance of a residence surplus to an agricultural operation and the new residential lot must include the surplus residential dwelling and any associated additional residential units.”

**In Definitions (Chapter 8)**, add a definition of Farm Consolidation.

As previously mentioned, OFA appreciates the requirement for planning authorities to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base; and that impacts from any new or expanding non-agricultural uses on the agricultural system, or where avoidance is not possible, are to be minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

OFA firmly believes in the widespread use of agricultural impact assessments, as they ensure that *agricultural uses* continue and *normal farm practices* are protected. Agricultural impact assessments 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.

In addition to the impacts on the agricultural system, OFA notes that a new or expanding non-agricultural use may also directly impact individual agricultural operations and lands. Therefore, OFA recommends the agricultural impact assessment consider the impacts on the surrounding agricultural operations and lands as well as the agricultural system.

Specifically, OFA recommends:

**In policy 4.3.5.2**, revising “Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.” to read “Impacts from any new or expanding non-agricultural uses on

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surrounding agricultural operations and lands as well as the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.”

OFA further requests that restrictions on Lot Creation in Prime Agricultural Areas be further applied to land designated as Rural Lands where agricultural uses are the predominant land use.

## Conclusion

OFA is a strong advocate for the protection of Ontario’s farmlands for their long-term ability to produce food, fibre, fuel, flowers, and nursery stock, not only for Ontario’s growing population, but also for consumers beyond our borders. Ontario’s limited supply of farmland is a scarce resource, making up less than five percent of all the land in the province. Given Ontario’s farmlands are a finite and shrinking resource, any proposals designed to increase housing supply must be done with consideration to the needs and support of the agricultural community.

OFA is pleased the government decided to hold further public consultations on the specific proposed wording contained in these proposed PPS2024 policies. OFA appreciates the opportunity to provide our feedback and agricultural perspectives. We look forward to working with the provincial government and our municipal counterparts to find ways that build more homes and protect farmland and the Agricultural System.

Sincerely,



Drew Spoelstra  
President

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