

November 21, 2025

Planning Consultation
Ministry of Municipal Affairs and Housing Provincial Planning Branch
777 Bay Street, 13th Floor
Toronto, ON
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Submitted online and to PlanningConsultation@ontario.ca

To the Planning Consultation Team,

Re: [ERO # 025-1099](#), Consultation on simplifying and standardizing official plans

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for ERO # 025-1099 by providing input on the potential regulation and standardization of municipal official plans. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses.

OFA is aware that Ontario's municipal governance structure is complicated and that official plans vary across the province. OFA understands and agrees with the desire to see consistent interpretation and implementation of the *Provincial Planning Statement* (PPS) through municipal official plans. While our organization supports the broad goal of this undertaking, OFA emphasizes that local municipalities have a critical role, and the adjustment of their powers must be addressed with a discerning eye for downstream policy outcomes. Municipalities also have distinct local histories, cultures, geographies, and economies that inform why their official plans were written differently from those of their neighbours'. Our feedback below is summarized as follows:

- Consistently structured official plans would benefit farmers who are active in multiple municipalities, saving time and money interpreting dissimilar plans;
- Agricultural policies should be consistently interpreted and applied throughout the province, but allow for flexibility suitable to the various types of agricultural use found in different areas;
- Standardized official plans will need space for special local policies that address local priorities, circumstances, and interests, such as specialty crop areas;
- OFA supports the use of upper-tier planning as an effective means of achieving consistency in planning across regions and counties, notably for policies like minimum distance separation and prime agricultural areas;
- OFA is concerned about the proposal to move development standards into the zoning by-law, as that local planning instrument is more conducive to amendment than official plans;
- It would be a challenge to determine a fair absolute limit on the length of official plans;
- OFA opposes basing the length of an official plan on the population of a municipality;

- Some official plans could be shortened if external documents were not appended;
- The standard agricultural land use designation should be used to protect prime agricultural land and productive farming areas throughout the province from urban encroachment; and
- OFA continues to advocate for fixed urban boundaries.

A. Official Plan Structure and Contents

Consistency between municipalities and tiers

OFA supports upper-tier planning and considers it an effective tool for ensuring that agricultural policies are consistently interpreted across lower-tier municipalities and are fairly implemented. The PPS (2024) requires that municipalities follow an *agricultural system approach* and further requires *agricultural impact assessments* (AIAs) for non-agricultural developments in prime agricultural areas and settlement boundary expansions. The standardization of official plans must reserve adequate space for municipalities to meet the expectations of the PPS (2024), which may be best addressed by municipalities at the upper- or single-tier.

The consistent organization of official plans should help farm businesses that are attempting to compare the policy differences between municipalities. However, municipalities should retain some flexibility as local circumstances require. Some municipalities have special agricultural policies, notably for specialty crop areas or where large agri-food processing plants and distribution centres connect farm to fork. These municipalities must be allowed to detail the policies that protect and encourage their agricultural system, including supportive industries. Ontario produces over 200 agricultural commodities, and it is important that official plans respect the normal farm practices of our diverse agri-food industry.

The differences between official plans are felt most sharply by our members whose properties abut with municipal boundaries, or who own properties in more than one municipality. Our members have commented to us that uneven and inconsistent planning rules between municipalities complicates their businesses, requiring more money and time invested in researching what is permitted in one place as opposed to another, particularly with reference to additional residential units (ARUs), farm worker housing (FWH), on-farm diversified uses (OFDUs), and agriculture-related uses (Ag-RUs). Even the definition of *agricultural use* sees inconsistency, though it is defined in the PPS, as some municipalities attempt to define what crops are and are not agriculture. OFA supports the consistent and fair implementation of the PPS policies that enable these land uses.

Development Standards

The province has also suggested that development standards should be listed in the zoning by-law, and not the official plan. OFA is concerned that moving some important development standards into the zoning by-law would leave them more vulnerable to amendment, or create confusion regarding to what extent they may be amended. An example is *lot size*: Agricultural lots must be adequately sized for agricultural use, as required by the PPS. If this policy is listed in the official plan, it would be relatively difficult to amend and landowners will understand more quickly that it is a provincially required policy; if it is listed in the zoning by-law, that planning instrument is more flexible and easier to amend, and landowners may feel tempted to try, perhaps inappropriately by using a minor variance. Therefore, placing lot sizes and other important agricultural policies in the zoning by-law may inadvertently encourage farmland fragmentation.

B. Limiting the Length of Official Plans

Absolute limits versus limits that scale with population

The province has proposed limiting the length of official plans by setting a page limit (e.g. 250 pages), a word limit (e.g. 65,000 words), or basing the maximum length on the number of residents in a municipality. It would be technically challenging to determine a fair limit for the length of official plans.

Placing an absolute page or word count limit would disadvantage municipalities that are more economically or geographically diverse, or are home to complex infrastructure, unique areas, or interact with federal regulations. Municipalities need adequate space to define their policies so they are effective and capture local interests and circumstances. Enforcing a limit on the length of official plans may have the unintended consequence of preventing some municipalities from creating policies that support new economic projects or enable targeted growth.

OFA opposes basing official plan length limits on population size. Basing the maximum page or word count of official plans on the municipality's population size would heavily disadvantage rural municipalities. The population of a municipality does not scale with the complexity of local planning considerations, such as the agricultural system, economy, infrastructure, natural or cultural heritage.

Alternatives to the proposed limits

Some municipalities have copied external policy documents into official plans or their appendices. While this practice is well-intentioned, it can lead to inaccuracies as external policy documents are updated, and contributes to the sizeable length of some official plans. Municipalities can, and in some cases must, make use of external documents such as the *Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas* or the *Minimum Distance Separation Document*. Linking to a current version of these documents may be a way to save space. The province could encourage this by providing "stable links" to the current version of guidelines and policy documents.

C. Creating Permissive Land Use Designations

The best and highest use of Ontario's arable land is agriculture. OFA supports the province's policy to protect prime agricultural lands (Class 1-3 Soils) and associated land that contributes to the agricultural system under prime agricultural area designations. OFA continues to recommend that Class 4 soils be included in the prime designation, as they are often productive agricultural lands. It is important that municipalities of every tier understand and consistently apply the prime agricultural area policy. OFA supports the use of upper-tier planning to ensure this policy is consistently applied throughout Ontario's regions and counties.

Standardizing the land use designations used under an official plan might assist municipalities to avoid appeals to the Ontario Land Tribunal, as the correct interpretation or application of a policy is often the root cause of a planning disagreement. The inclusion of "Standard Land Use Designation No. 10, Agricultural Areas," is therefore appreciated, which could be used to protect agricultural areas and prevent the encroachment of non-agricultural uses. OFA advises that the consistency and inter-readability between the policy statement and official plan documents may be improved by titling this designation "Prime Agricultural Areas." However, rural areas outside of prime agricultural areas are also often farmed, including industrial areas and rural lands, and the

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province should be careful not to restrict farming in areas with existing agricultural operations or have the potential for agricultural use.

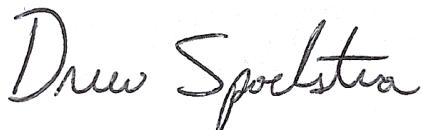
The importance of the prime agricultural area designation must be reinforced, as the decision to redevelop farmland into non-agricultural uses, like residential uses, is irreversible and must not be allowed. Between 1996 and 2021, the cumulative effects of such planning decisions resulted in over 2.1 million acres of farmland being taken out of production, an area greater than Algonquin Park. Future generations will not have the opportunity that these once-prime lands would have offered, which is the intent of the PPS's instruction to protect farmland "for long-term use for agriculture."

Relatedly, OFA continues to advocate for fixed urban boundaries. New settlement and employment areas should be avoided wherever possible, particularly if they are low-density or single-use. Among the goals listed in ERO 025-1099 is to enable permissive land use designations. Single-use designations by definition are less permissive than mixed-use designations. Single-use areas are also dependent on private commuter vehicles, making them inefficient from a land use perspective as they require large parking areas and add to traffic congestion, which leads them to be associated with urban sprawl. Furthermore, these areas are often built at the expense of farmland, which cannot be recovered after it is developed into another land use.

Closing Comments

OFA appreciates the opportunity to provide our feedback and perspectives on the streamlining and standardization of official plans. The material provided in ERO 025-1099 includes agricultural concerns, and the concept of a standard, protective designation for prime agricultural areas is encouraging. We look forward to working with the provincial government to find policy solutions that support the agri-food sector.

Sincerely,



Drew Spoelstra
President

cc: Hon. Rob Flack; Minister of Municipal Affairs and Housing;
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness;
Hon. Lisa M. Thompson, Minister of Rural Affairs; and
OFA Board of Directors.

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.