

May 14, 2026

Planning Consultation
Ministry of Municipal Affairs and Housing
777 Bay Street, 12th floor
Toronto, ON M7A 2J3

Submitted online and to PlanningConsultation@ontario.ca

To the Planning Consultation Team,

Re: ERO # 026-0314, Proposed Changes to Various Regulations Under the Planning Act and the City of Toronto Act, 2006 to Specify Additional “Prescribed Professions” for the Purposes of a Complete Application; ERO # 026-0313, Streamlining the information and material that planning authorities can require as part of a complete application; ERO # 026-0310 Proposal to reform site plan control under the Planning Act and the City of Toronto Act, 2006;

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to participate in the consultation process for the above-noted Environmental Registry of Ontario postings by providing comment on proposed changes to municipal *site plan control* powers, land use planning guidance, and *prescribed professions* certified to prepare planning studies and reports. 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.

Summary of OFA’s comments:

- Completing an *Agricultural Impact Assessment (AIA)* requires specialized knowledge and an understanding of the unique local circumstances;
- AIA approval authorities must retain their ability to request reviews and further exploration by experts, regardless of being prepared by prescribed or certified professionals;
- OFA is pleased to see that AIAs and *minimum distance separation (MDS) formulae assessments* are listed as contingent requirements for *complete applications*;
- OFA does not support the revocation of *site plan control* powers, which is useful for implementing the findings of AIAs and *MDS formulae assessments*, which are important to the agri-food sector;
- Municipalities should be supported in their operations and encouraged to use resources efficiently so that *site plan control* applications are processed in a timely manner;
- Dividing *site plan control* into simple and complex intake streams could help municipalities triage incoming applications; and
- OFA recommends that small and rural municipalities be consulted regarding their capacity to process applications subject to *site plan control*.

Complete Applications and Prescribed Professions

The MMAH has requested feedback on *prescribed professions* regarding housing, economic, and infrastructure development. *Agricultural impact assessments (AIA)* and *minimum distance separation (MDS) formulae assessments* are required where urban, *sensitive land uses*, and non-agricultural uses interact with agricultural areas.

Given Ontario's diverse agriculture sector, producing over 200 commodities, completing AIAs requires specialized knowledge. AIAs are best completed by a team with expertise in geography, land use activities, and regulations. Approval authorities for AIAs must retain their ability to request content reviews and supplemental work by appropriate experts, as there is no one profession that can address all of agriculture, structural engineering, soil science, geoscience, hydrogeology, groundwater and well water safety, landscape architecture, municipal engineering, resource management related disciplines, supply chain management, environmental related disciplines, *normal farm practices*, land use planning, and other relevant fields.

MDS formulae assessments also require specialized knowledge in livestock agriculture. The *Minimum Distance Separation (MDS) Document* requires proponents and planning authorities to understand the differences between livestock species, livestock facility and manure storage designs, concepts such as *nutrient units*, interactions between the 43 MDS implementation guidelines, and planning concepts such as the *four tests of minor variance*. Incorrect MDS interpretations can result in serious implications for livestock farmers, whose growth potential can be frozen by *sensitive land uses* receiving planning permission within their operations' MDS setbacks. OFA's members have also observed that proponents sometimes estimate livestock numbers and *nutrient units* rather than consult with farmers as required by the *MDS Document*.

As farmers are considered third-party to a development application made by a neighbour, they cannot appeal MDS planning decisions to the Ontario Land Tribunal (OLT). OFA encourages the province to reinstate third-party appeals for this reason. As an alternative, livestock farmers could be deemed "second-party" to development applications that reference their livestock operations, respecting how their data is being used by proponents in ways that directly affect their farm businesses' success.

OFA is pleased to see AIAs and *MDS formulae assessments* listed as contingent studies as part of a *complete application*. The PPS requires these studies where non-agricultural uses encroach on agricultural areas. Development found to be incompatible with *agricultural uses*, such as housing, must be redirected away from *rural areas* and into appropriate urban areas. Land use compatibility between urban and *rural areas* have serious implications for the agri-food sector which contributes over 51 billion dollars to the economy and employs one in nine Ontarians.

Site Plan Control

OFA does not support revoking *site plan control* powers. Planning authorities invoke *site plan control* to ensure that development is functional, safe, and compliant with related policies, which involves administration over topics like building placement, road access, walkways, and various

forms of infrastructure. AIA and MDS can involve all of the above. Implementing the avoidance, mitigation, and minimization findings and recommendations of an AIA may involve site plan adjustments. The MDS is particularly interested in building placement.

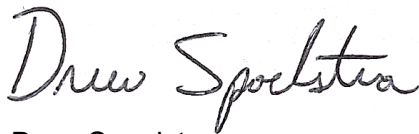
OFA agrees with the ministry that streamlining *site plan control* could benefit farmers, particularly those considering *on-farm diversified uses* and *agriculture-related uses*. Municipalities should be supported in their operations and encouraged to use resources efficiently so that *site plan control* applications are processed in a timely manner.

Dividing *site plan control* into simple and complex intake streams could help municipalities triage incoming application volumes. OFA advises that a decision timeline should continue to be required for *site plan control* applications. The public may be best served by imposing different timelines for simple and complex *site plan control* intake streams. OFA recommends that the MMAH consult with small and rural municipalities regarding what capacity they have to address proposals that trigger *site plan control*, and what support they need from the ministry with regards to improving timeline fulfillment.

Closing Remarks

OFA appreciates this opportunity to provide our feedback and perspectives on prescribed professions and *site plan control*, which are topics of interest to the agri-food sector. AIA and MDS are complex tools that require knowledgeable experts to handle. OFA supports these planning tools which are often implemented in part through *site plan control*. OFA recommends against revoking *site plan control* powers and instead recommends streamlining *site plan control* according to municipal capacities. We look forward to working with the provincial government and our municipal partners to find policy solutions that support the agri-food sector and protect Ontario's agricultural system.

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;
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>.