



CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

May 9, 2024

Attention: Planning Consultation
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay St., 13th Floor
Toronto, ON M7A 2J3
Delivered via email: planningconsultation@ontario.ca

Re: ERO 019-8370 “Proposed Changes to Regulations under the Planning Act and Development Charges Act, 1997 Relating to the Bill 185, Cutting Red Tape to Build More Homes Act, 2024 (Bill 185): Newspaper Notice Requirements and Consequential Housekeeping Changes.”

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about the protection of productive agricultural land. Ontario's farmland is the foundation for the significant economic contributions of our agri-food sector. Farmland also provides environmental goods and services. Productive farmland is vital to our food security, here in Ontario and globally. All these benefits need to be appropriately considered when reviewing policies that may impact farmland in Ontario. The CFFO wants to see stronger protections on farmland in provincial and municipal land use planning.

The CFFO is concerned about potential impacts to agricultural land and viable farming businesses from some of the proposals outlined in ERO 019-8370 relating to Bill 185, “An Act to Amend Various Acts.” We recommend that:

- Posting notices in local newspapers should still be recommended for statutory land use planning notice requirements.

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- Third party appeals continue to be permitted regarding planning matters, including official plans, official plan amendments, zoning by-laws, and zoning by-law amendments.

Modernizing Public Notice Requirements

The CFFO supports the recommendation to add additional methods to meet the land use planning notice requirements. The practice of publishing a notice in a local newspaper is still beneficial for many reasons, including reaching a broader audience within the local community. This practice should continue to be recommended, even if other methods are permitted to meet the notice requirements.

Third Party Appeals

The CFFO does not support the proposal to limit third party appeals for all planning matters. It is disappointing to see this reintroduced after having been removed from a previous bill due to significant opposition. The CFFO's opposition has not changed.

This will restrict farmer-landowners from access to third party appeals when changes to official plans or zoning by-laws affect their property or their business, but where they are not a key participant. As an example, it is important that farmers can access third-party appeals to ensure Minimum Distance Separation rules are correctly applied. Third party appeals are also important when private applications for changes would significantly impact neighbouring farming businesses.

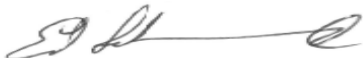
The CFFO requests that third-party appeals continue to be permitted regarding planning matters, including official plans, official plan amendments, zoning by-laws, and zoning by-law amendments.

Conclusion

Land use policies in Ontario should continue to recognize the unique needs of the agriculture sector and work to ensure agriculture and agri-food businesses thrive in our province. Posting notices in local newspapers should still be recommended practice for giving public notice related to land use planning. The CFFO recommends that third party appeals continue to be permitted regarding planning matters.

We appreciate your consideration of our recommendations.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario

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