



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 019-8369 “Proposed Planning Act, City of Toronto Act, 2006, and Municipal Act, 2001 Changes (Schedules 4, 9, and 12 of Bill 185 – the proposed Bill 185, Cutting Red Tape to Build More Homes Act, 2024).”

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 019-8369 relating to Bill 185, “An Act to Amend Various Acts.” We recommend 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.

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- Applicant appeals not be permitted regarding municipal refusals or failures to make a decision on privately requested official plan and zoning bylaw amendments that would change a settlement area boundary.
- Upper-Tier planning responsibilities should be retained in regions and counties across the province.

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.

Settlement Area Boundary Expansions

The proposed Provincial Planning Statement, that forms a part of the overall land use planning changes under Bill 185, no longer specifies that settlement area boundary expansions are only permitted as part of a Municipal Comprehensive Review. Combining that change with the proposal to allow proponents to appeal municipal decisions will undermine municipal planning and put significantly more farmland at risk. It will also increase speculation on farmland in proximity to settlement areas, negatively impacting agriculture beyond direct farmland loss.

Applicant appeals should not be permitted regarding municipal refusals or failures to make a decision on privately requested official plan and zoning bylaw amendments that would change a settlement area boundary.

Upper-Tier Planning Responsibilities

The CFFO is concerned about the removal of planning responsibilities from selected upper tier municipalities, including the regions of Durham, Halton, Niagara, Peel, Waterloo, York, and the County of Simcoe. Bill 185 specifies that these changes will come into force on July 1, 2024 for the regions of Peel, Halton and York, with the changes for the remaining four to happen at an unspecified time later in 2024.

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The full implications of such a major change to land use planning are not clear. The CFFO is concerned that farmland loss and fragmentation will increase under a strictly lower-tier municipal planning regime.

Planning at a regional level ensures more coordination, including around allocation of population growth and for resources such as transit. Regional-level planning has been beneficial to farmland protection in many areas. Regional-level planning allows greater access to planning staff which benefits all lower tier municipalities and is especially important for smaller (usually rural) lower-tier municipalities.

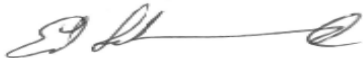
The CFFO supports retaining current upper-tier planning responsibilities across the province.

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. The CFFO recommends that third party appeals continue to be permitted regarding planning matters. Applicant appeals of municipal decisions that would change settlement area boundaries should not be permitted. Planning responsibilities currently assigned to upper-tier municipalities should be retained across the province.

We appreciate your consideration of our recommendations and concerns.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario

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