



CHRISTIAN FARMERS FEDERATION OF ONTARIO

ACCREDITED FARM ORGANIZATION

May 9, 2024

Attention: Growth Planning
Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
777 Bay St., 13th Floor
Toronto, ON M7A 2J3
Delivered via email: growthplanning@ontario.ca

Re: ERO 019-8462 “Review of proposed policies for a new provincial planning policy instrument.”

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. It is the foundation for the significant economic contributions of our agri-food sector and 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 recognizes the importance and value of increasing housing supply in both urban and rural settlement areas. The CFFO supports increased housing within settlement area boundaries through intensification and redevelopment. Rural residential settlement should focus on increased density within towns, hamlets, and villages rather than through lot creation.

The CFFO is pleased to see some of the changes proposed in the Provincial Planning Statement include important policies to protect farmland and viable farm businesses, many of which we have advocated for in previous correspondence. We appreciate the government's recognition of the importance of these policies to support agriculture in Ontario. These include:

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- Requirements to use an Agricultural System approach across Ontario.
- Use of Agricultural Impact Assessments (AIAs) or equivalent in prime agricultural areas.
- Respect for Minimum Distance Separation (MDS) formulae.
- Encouragement of local food production and urban agriculture.

The CFFO has concerns about the implications for farmland and farm businesses of other aspects of the draft proposal. The CFFO recommends that:

- Municipalities with existing provincial mapping of prime agricultural areas be required to retain that mapping. Provincial mapping should be extended across all agricultural areas of the province.
- Provincial guidelines for the use of AIAs be released to ensure that proper studies are conducted and that recommendations are implemented.
- Lot creation due to farm consolidation only permit a *principal residence* to be severed in prime agricultural areas, and any attached or associated ARUs would be included as part of the residential severance (i.e. ARUs could not be severed separately from the principal residence).
- Permission for additional residential units (ARUs) in prime agricultural areas and rural lands more clearly specify the maximum size relative to the principal dwelling to a total maximum size.
- Provincial guidelines on ARUs in both prime agricultural areas and rural lands make a clear distinction between ARUs and farm worker housing.
- Requirements to meet outlined criteria for settlement area boundary expansions be retained, including that this should occur as part of a Municipal Comprehensive Review.

Additionally, the CFFO is concerned about the limited time allowed for consultation on these significant changes to land use planning across the province. Not-for-profit organizations need time to be able to review the materials and consult with our membership on the changes proposed. Municipal and regional governments are also hard pressed to appropriately review and approve comments in such a short timeline. More time should be given.

Agriculture System and AIAs

The CFFO is pleased to see many policies included that support viable farm businesses across the province. Among them, we support ongoing protection of Minimum Distance Separation (MDS) formulae. We would like to see the distance be the same for both farms and development. We also support the encouragement in section 4.3.6.1 for local food production and urban agriculture.

We especially appreciate that the Agriculture System approach is being retained from previous land use planning documents. The draft indicates in section 4.3.1.1 that this

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will be required across the province. Support for the agri-food network is also highlighted in 4.3.6.1.

The CFFO requests that, where the province has previously mapped prime agricultural areas, municipalities be required to retain that mapping. The CFFO also requests that the province continue to keep that mapping up to date and extend the provincial mapping across all agricultural areas of the province.

The Agricultural System is an interconnected network with significant components that operate at a provincial scale. This includes both the land base and key aspects of the agri-food network. It is vital that provincial standards for the definition of prime agricultural land are consistently applied in all municipalities. The province must support this systems approach with appropriate leadership, guidance, as well as resources including the provincial mapping of lands and the agri-food network, to keep this policy relevant. It cannot operate meaningfully at a lower-tier municipal scale.

The CFFO is pleased to see that Agricultural Impact Assessments (AIAs) will be required in prime agricultural areas as outlined in section 4.3.5.2. **The CFFO also requests that provincial guidelines for the use of AIAs be released as soon as possible to ensure that proper studies are conducted and that recommendations are implemented.**

Additional Residential Units

The CFFO is supportive of allowing Additional Residential Units (ARUs) within existing residential lots in rural lands and prime agricultural areas. This provides increased opportunities for rural housing with minimal or no loss of farmland. This will allow farm families to create additional housing units close to the farm where they work.

The CFFO is also pleased to see that the proposed lot creation rules in prime agricultural areas (as outlined in 4.3.3.1 c) only allow for a single residential severance as a result of farm consolidation. However, combined with permission for ARUs, some clarification is necessary.

The CFFO requests that only a principal residence can be severed due to farm consolidation in prime agricultural areas, and any attached or associated ARUs would be included as part of the residential severance (i.e. ARUs could not be severed separately from the principal residence).

It is important that the permission for ARUs not create an increased possibility of severances or new lot creation. The policy wording needs to be clear that any ARUs need to stay associated with the principal residence to which they are “additional.”

The CFFO requests that the language permitting additional residential units (ARUs) more clearly specify the maximum size, relative to the principal dwelling

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to a total maximum size for ARUs permitted in rural lands and prime agricultural areas.

ARUs are meant to be secondary and thus smaller than the principal dwelling. Permitting ARUs of significant size would increase pressure for permission to sever these residences at a future date. Not only the severance policy itself, but also rules around the relative and maximum size will indicate the intention that these ARUs remain secondary and associated with the principal dwelling.

It is also important that provincial guidelines on ARUs in both prime agricultural areas and rural lands make a clear distinction between ARUs and farm worker housing. Farm worker housing is permitted as an agricultural use.

Settlement Area Boundary Expansions

Settlement area boundary expansions should be avoided, wherever possible, by intensification and brownfield redevelopment within the settlement area boundary, and by ensuring lands already approved are being developed before any new areas for expansion are approved. However, when necessary, settlement area boundary expansions must be carefully considered and planned as part of an overall vision for the municipality.

The proposed Provincial Planning Statement would not require that these expansions be limited to the time of Municipal Comprehensive Review. It further indicates that planning authorities “shall consider” rather than “shall demonstrate” compliance with the key criteria listed.

The CFFO requests that boundary expansions be limited to the time of Municipal Comprehensive Review and that planning authorities “shall demonstrate” compliance with the criteria. This means that some wording in the listed criteria would also need to change, including in 2.3.2.1 c), which should read “that the applicable lands *do not* comprise speciality crop lands.”

We highlight here that we have also requested that 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 (ERO 019-8369). This right to appeal, combined with the proposal in the Provincial Planning Statement to allow boundary expansions at any time, would move away from careful long-term planning and move instead to developer driven sprawl outside of meaningful municipal control.

Importance of Protecting Farmland

CFFO members express time and again how important farmland protection is to them as farmers and as Christians. Stewardship of farmland is a primary concern. Farmers are looking at the long view, the big picture. **We have a responsibility to future**

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generations, be they farmers, consumers, or Ontarian citizens, who will benefit or suffer from our choices today. Good land use planning supports farmers in their stewardship work and ensures that all of society recognizes the value of the land we care for in our lifetimes.

Conclusion

The CFFO recommends that existing provincial mapping of prime agricultural areas be retained, and further mapping be extended across all agricultural areas of the province. Provincial guidelines for the use of AIAs should be released.

Additional Residential Units (ARUs) must remain with a principal residence in a situation of lot creation. Furthermore, rural ARUs need to specify size relative to the principal dwelling to a total maximum size. Provincial guidelines need to make a clear distinction between ARUs and farm worker housing.

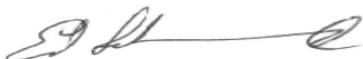
Settlement area boundary expansions should occur only as part of a Municipal Comprehensive Review and be required to meet outlined criteria.

The CFFO is pleased to see key policies in the proposed "Provincial Planning Statement" that support agriculture, including respect for Minimum Distance Separation (MDS) formulae, support for local food production, use of an Agricultural System approach, and requirements for Agricultural Impact Assessments (AIAs).

The CFFO strongly believes land use policies in Ontario must continue to recognize the unique needs of the agriculture sector and work to ensure agriculture and agri-food businesses thrive in our province.

We appreciate your consideration of our concerns and recommendations.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario

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