



November 16, 2022

The Honourable Steve Clark
Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay St., 13th Floor
Toronto, ON
M5G 2E5

RE: ERO Registry #019-6163 for input on the Proposed Planning Act and City of Toronto Act Changes (Schedules 9 and 1 of Bill 23 - the proposed More Homes Built Faster Act, 2022)

Dear Minister Clark,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated ecological lands through direct land securement, stewardship, policy research, and public education. Our goal is to ensure a safe and sustainable food supply for future generations in this province by protecting farmland in perpetuity.

With growing food insecurity in the province and the world, it is more important than ever before that we protect the finite and non-renewable resource that is our agricultural soil. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 860,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP¹. In order to preserve the viability of Ontario's agri-food sector, it is crucial that the province's finite supply of agricultural land is protected.

In the past, OFT has commended the Province's commitment to the policies that strengthen agriculture in Ontario. We recognize the need to address issues of housing availability and affordability, however, OFT would like to encourage the Province to continue showing a strong commitment to Ontario's agri-food sector by making policy decisions that protect agricultural systems, agricultural land and food security and support the continued production of local food.

The housing crisis facing Ontario is a real and wide-spread problem, however, OFT is concerned that the provincial policy changes in Bill 23 will not provide an effective solution. If this crisis is not addressed effectively, it will only exacerbate the other challenges Ontarians have to face, such as rising food insecurity, rising land prices, and the destruction of the agricultural system in Ontario.

OFT does not support the proposed changes to the Ontario Land Tribunal that are included in Bill 23, and suggests that Schedule 7 of Bill 23 is withdrawn.

Currently, the Tribunal allows for a third party to appeal planning decisions, which can be crucial for farmers when these decisions place their livelihood at risk. The expanded powers described in Bill 23 that allows for issues to be dismissed without a hearing will negatively impact farmers whose operations are being put at risk when approvals are improperly given to development projects in close proximity to agricultural operations. This will ultimately result in the agricultural system in such areas being disrupted and the farmland being lost. OFT feels that removal of such processes will promote conflict between



farmers, municipalities, and residents and that the burden of these conflicts will be placed unduly on the farmer. OFT is especially concerned with how the proposed changes will affect farmers seeking to appeal a planning decision that will affect their livelihood, such as when a planning decision violates the Minimum Distance Separation formulae and limits the type of agriculture that may be practiced on a particular piece of farmland. Ontario cannot afford to keep losing agricultural land at the current rate. The proposed changes to the Ontario Land Tribunal will only magnify this loss.

Additionally, with the proposed exemption of site plan control for residential development for residential units for up to 10 units, there are even fewer opportunities to address these issues and concerns. Errors often occur and whether they are addressed in site plan control or by the Ontario Land Tribunal, farmers need to be provided with mechanisms to address significant concerns that threaten their operations and the greater agri-food system throughout Ontario.

OFT believes that it is important that the agricultural community still have third-party appeal mechanisms available to them in order to correct planning issues, and as such that Schedule 7 of Bill 23 is withdrawn.

Ontario needs an increased housing supply, but what is proposed in Bill 23 is not an effective solution. Ontarians need affordable, high-density housing solutions that provide residents with easy, walkable, access to public transit and amenities². New development built upon annexed farmland and natural areas are not an equitable solution to the housing crisis, and will only serve to magnify both the climate crisis and food insecurity.

Thank you for this opportunity to share our recommendations and feedback on ERO 019-6163. We sincerely hope you take our suggestions into consideration when reviewing the feedback you receive. If you have any questions or would like to speak further on these issues, please do not hesitate to get in touch. We look forward to continuing to work with the Province to strengthen the agricultural system and protect the viability of the agricultural sector.

Most Sincerely,

Martin Straath of
Executive Director
Ontario Farmland Trust

Bernard Pope
Chair, Board of Directors
Ontario Farmland Trust

Margaret Walton
Chair, Policy and Education Committee
Ontario Farmland Trust



References:

- [1] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Jacobus, R. (2019). Inclusionary housing: Creating and maintaining equitable communities. *Lincoln Institute of Land Policy*. <https://www.jstor.org/stable/pdf/resrep22075.pdf>