

The Honourable Steven Clark  
Minister of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, Ontario M7A 2J3

Submitted via email to [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca), [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca) and via the **Environmental Registry of Ontario (ERO)**

Dear Chair Minister Clark,

**RE: ERO 019-6813 Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.**

The Dufferin Federation of Agriculture (DFA) represents more than 575 farm family members across the County of Dufferin, supporting our members and the agri-food industry on issues, legislation and regulations managed by all levels of government.

In 2021 the agri-food sector employed 3,545 people through 926 local agri-food business establishments generating \$195 Million in farm cash receipts in Dufferin County and is the top economic driver.

We would like to take this opportunity to express our concerns about the proposed Provincial Planning Statement. **DFA appreciates that a pause has been indicated on the original lot creation policy on Ag lands put forth, but we must emphasize that any lot creation on Ag lands should not happen as even one severance impacts agriculture**—most notably the livestock sector as these lands become sterilized.

The DFA is a strong supporter of preserving prime farmland—including classes 1, 2, 3 and 4, and specialty croplands in Dufferin County and across rural Ontario and keeping the integrity of the agricultural system intact. We believe strongly in the current Provincial Policy Statement (2020) that governs farmland and rural areas, protecting the right to farm and the agriculture system in Ontario.

DFA also acknowledges the need for housing and to address the ‘missing middle’ and believes that this can be accomplished largely through intensification. Several reports indicate that there is currently more than enough land available without expanding urban boundaries. This is substantiated by the Province’s Housing Affordability Taskforce which stated, “a shortage of land isn’t the cause of the problem.” We urge the government to consider the helpful input offered in: “Bill 23, [Submission](#) to the Ministry of Municipal Affairs and Housing Environmental Registry of Ontario, November 17, 2022, Eby, Thomason and Reusser”

Our primary concerns are as follows:

- DFA is strongly opposed to all residential lot creation on Ag lands (as this restricts livestock agriculture and leads to increased rural-urban conflict due to noise, dust, smell, light, trespass etc.)
- Current provisions for accessory dwelling units on farms and housing for seasonal workers are sufficient to address farm housing needs. DFA supports the use of Accessory Dwelling Units to allow for retirement on farms, farm succession as well as housing farm employees. Any issues with farm

succession amongst a family are not meant to be addressed with permanent severances but are better dealt with economic or social initiatives.

- Dufferin County has unique soils, with some of the most productive potato soil in the province. There is no provincial protection for specialty soils in this new PPS.
- According to Ontario Farmland Trust, Ontario is already losing 319 acres of farmland every day. With lot creation allowed on farms, this could remove an additional 7500 acres in Dufferin out of production, and further sterilize the surrounding farmland making this loss effectively greater.
- Settlement Area Boundary Expansions. DFA is strongly against the proposed changes to settlement area boundary expansion policies. The changes have removed both the requirement to justify need and to conduct a comprehensive review. This could lead to inconsistent municipal implementation, agricultural land fragmentation, and inconsistent protections and considerations for agricultural land across municipal boundaries.
- Elimination of intensification targets in established urban areas. Long term farmland protection happens within urban boundaries.
- Cost of community service studies completed by OFA in Ontario (one in Dufferin County) and dozens of studies in the United States show that rural residential properties are the most expensive to service.
- DFA believes that the PPS should be used as a baseline and that the provisions that limit the flexibility of municipalities should be removed. Municipalities vary across the province and DFA believes that they should be allowed to be more restrictive within the local official plan so long as it is in accordance with the PPS.
- DFA is opposed to low density development on rural lands. Dufferin has a significant amount of land that is zoned rural and could become urbanized very quickly if current proposed legislation is passed. This will further sterilize the agricultural area and cause conflict, water issues and increase costs.

Provincially, the protection of Ontario's prime agricultural areas for their long-term agricultural use must be a key objective. It is one thing to think about housing the anticipated additional two million people that will reside in Ontario over the next ten years, but this needs to be balanced against how we will feed **this increased population**. Further the potential impact of the proposed PPS changes to provincial agricultural output and GDP throughout the agriculture value change must be quantified.

The proposed changes to the PPS will result in an unprecedented change to rural Ontario and agriculture in particular and therefore ramifications and impact these proposed changes to all sectors of Ontario, both social and economic, must be thoroughly considered.

Thank you for considering our comments.

Sincerely,



Bill McCutcheon, President  
Dufferin Federation of Agriculture

cc. Sylvia Jones-Deputy Premier, Mike Schreiner MPP, John Vanthof MPP, Doug Ford-Premier, Lisa Thompson-Minister of Agriculture, Peggy Brekveld, Cathy Lennon, Matthew Rae MPP-Perth  
Wellington