



August 4, 2023

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing

The Honourable Lisa Thompson  
Minister of Agriculture, Food & Rural Affairs

**RE: Proposed Provincial Planning Statement 2023**

Flowers Canada (ON) Inc. (FCO) is pleased to respond to the Ministry of Municipal Affairs and Housing following the July 12th roundtable discussion on the Provincial Planning Statement (PPS). FCO represents approximately 200 greenhouse producers that account for more than 1300 acres of fresh flowers and bedding plants. Generating farmgate sales of over \$1 billion in 2022, the greenhouse floriculture sector is poised to grow at an estimated rate of 5% per year over the next 5 years providing we have the infrastructure to realize our goals.

The building of more new homes creates economic prosperity and growth. While we support municipalities in reaching their growth targets through additional new home builds, we also want to maintain a healthy environment for continued agricultural growth - which, as evidenced by our sector, is a huge economic driver in the province of Ontario.

We support the submission provided to your ministries following the July roundtable by our colleagues from the Ontario Federation of Agriculture and the Christian Farmers Federation of Ontario. In addition, we wish to take the opportunity to communicate the specific needs of our sector and how the potential changes to the PPS could impact our members.

**Farm Worker Housing**

The need for on-farm housing to support an expanding farm operation can not be understated. Our sector depends heavily on Temporary Foreign Workers (TFWs) to perform farming activities, and on-farm accommodations reduces pressure on local and near-urban residential property/housing markets. In addition, worker safety is paramount, and having workers live in close proximity to the farming activities avoids risks associated with transportation to and from the farm.

At the same time, there is a need to ensure there is flexibility to suit the farm operations and layout, and not prescribe where on the property the septic beds/housing will be situated. We acknowledge the design and sizing must be based on lot size, with appropriate sewer capacity

and setbacks. The proposed PPS (2023) Section 4.3.3.1.a.4.iii also appears to limit the size to accommodate use - it must be clarified that the size and nature of on-farm housing should be based on projected future use to allow for farm growth.

A further barrier for expansion of our sector related to on-farm accommodations relates to development charges imposed by some municipalities across the province. Further, municipal bylaws and requirements often exclude greenhouse under the definition of agriculture. The provincial government can assist our sector in achieving the growth targets by encouraging municipalities to be consistent in recognizing all agricultural sectors as unique and strong economic drivers, and to understand agricultural-specific needs. Standardized guidance excluding development charges for agricultural buildings (including on-farm accommodations), and the inclusion of agricultural planners within municipalities would be a great first step in supporting growth of our sector and streamlining expansion opportunities.

### **Agricultural Lands**

We want to emphasize the importance of ongoing mapping and assessments for all agricultural lands, as certain classes of land have value for agricultural expansion and yet may not be categorized as prime or specialty crop areas. We are concerned that the proposed PPS (2022, Section 2.6) removes the previous requirement for the planning authority to follow the relevant policies detailed in the PPS 2020 Section 1 (Building Strong Healthy Communities), Section 2 (Wise Use and Management of Resources) and Section 3 (Protecting Public Health and Safety). This change ultimately leaves rural lands that could potentially be used for agricultural expansion unprotected from development priorities of the municipality. Residential lot creation is no longer 'discouraged' in agricultural prime areas (PPS 2020 Section 2.3.4.1, PPS 2023 4.3.3.1)

In the proposed PPS 2023 Section 7, we welcome the addition of the term 'enhanced' in the Agricultural Condition Definition. While rural lands are considered to be lower-capability land for agriculture, it is possible to amend the soil and enhance the quality of the land, and also to utilize these lands for critical greenhouse expansion. All seven of the Canada Land Inventory classes of land have the potential to support greenhouse expansion. Supporting the growth of agriculture in rural areas avoids urban-agricultural conflicts related to lighting, noise, slow-moving farm equipment, and use of crop protection products.

FCO would like to express its gratitude for the extended opportunity to submit comment on this important process. By ensuring a thorough engagement with the agricultural sectors, this process will surely ensure a brighter future for all Ontarians.

Sincerely,



Ed Vermolen  
President, Flowers Canada (ON) Inc.

Cc:

Hon. Nina Tangri, Associate Minister of Municipal Affairs and Housing  
PA Matthew Rae to the Minister of Municipal Affairs and Housing  
PA Rob Flack to the Minister of Agriculture, Food & Rural Affairs  
PA Trevor Jones to the Minister of Agriculture, Food & Rural Affairs  
Jan VanderHout, Chair, The Ontario Greenhouse Alliance (TOGA)