

August 3, 2023

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
13th Flr, 777 Bay St  
Toronto, ON M7A 2J3  
Submitted online and by email: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

**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**

Minister Clark,

Please consider this letter as the National Farmers Union – Ontario’s (NFU-O) second submission to ERO 019-6813 (our first response was submitted on June 5<sup>th</sup>, 2023). We appreciate the ERO deadline extension and the opportunity for the accredited farm organizations and commodity groups to share with Hon. Lisa Thompson, Minister of Agriculture, Food and Rural Affairs (OMAFRA) on July 12<sup>th</sup>, 2023 our shared concerns regarding the Proposed Provincial Planning Statement.

The NFU-O is an accredited farm organization representing thousands of sustainable farmers in Ontario. Members work together to achieve agricultural policies that ensure dignity and income security for farmers while protecting and enhancing rural environments for future generations. We believe in the importance of a healthy, viable, and sustainable supply of food products grown, harvested, and processed right here at home. The NFU-O is confident that long-term food system security for the people of Ontario, Canada, and the world is a shared priority for the general public and our governments.

We applaud the government’s promise to remove “Lot Creation and Lot Adjustments” (4.3.4)—allowing for the creation of up to three new severed residential lots per farm parcel—from the Proposed Provincial Planning Statement (PPS). Abandoning this farmland severance proposal will help minimize the paving over of Ontario farmland, limit farmland speculation, avoid costly servicing and rural residential sprawl, and lessen conflicts between livestock farmers and non-farming rural residents. The NFU-O strongly recommends maintaining the current Lot Creation policies contained within the 2020 PPS.

The NFU-O has the following recommendations regarding the Proposed PPS:

- Maintain the requirement to demonstrate any need for Settlement Area Boundary Expansion;
- Strike a working group with the accredited farm organizations to create a consistent, practical, and fair Additional Residential Unit policy;
- Maintain the requirement for Provincially Mapped Agricultural Systems;
- Broaden the definition of what constitutes Prime Agricultural Lands; and
- Develop a truly sustainable and affordable housing strategy and farmland protection strategy.

### Settlement Area Boundary Expansion

The evidence suggests that the Greater Golden Horseshoe’s cumulative capacity inside existing urban boundaries is over two million units, far exceeding the provincial government’s target of building 1.5 million homes by 2031 ([Kevin Eby, 2023](#)). We question the need for settlement expansion when there is plenty of vacant and underused lands within Ontario’s current urban and municipal boundaries to support higher density and affordable housing development.

The NFU-O recommends maintaining the requirement for planning authorities to **demonstrate** (PPS 2020, 1.1.3.8), and not just **consider** (as it is presented in the Proposed PPS, 2.3.4) whether creating new and/or expanding current settlement areas will negatively impact prime agricultural areas, and whether there are reasonable alternatives within current urban boundaries through “intensification, redevelopment, and designated growth areas.”

### Additional Residential Unit (ARU) Policy

We believe that allowing for additional residential units on existing farmland parcels serves to prevent the further subdivision of and development on agricultural lands while giving farmers more flexibility to provide housing for family and staff. However, there is a lack of clarity regarding the proposed ARU policy. The size, location, and quality standards of ARUs on farm plots, issues of shared laneways/access, and assessing the impacts of ARUs on farmland and natural heritage features require greater consideration than is currently given in the Proposed PPS.

The NFU-O recommends that the Government strike a working group that includes representatives from the accredited farm organizations and commodity groups to ensure consistent and fair ARU criteria and to ensure ARU guidelines are practical and compatible with existing agricultural operations.

### Provincially Mapped Agricultural Systems

While the Proposed PPS does promise an “agricultural system approach,” it has abandoned the *A Place to Grow* (2020), Section 4.2.6, requirement of municipalities to use the provincially mapped Agricultural System in order to designate and protect prime agricultural areas for long-term use.

The NFU-O recommends including and expanding a provincially-mapped Agricultural System within the Proposed PPS to ensure we still have farmland to produce farm products for future generations of Ontarians. This will ensure specialty crop and prime agricultural lands are consistently mapped across Ontario, and will support economic development and job creation across the whole agri-food value chain.

### Prime Agricultural Lands

By revising the PPS, the Ontario Government has the opportunity to expand the definition of prime agricultural lands beyond Canada Land Inventory (CLI) Class 1-3 soils, to include CLI Class 1-6 soils, plus specialty crop lands. Class 4-6 soils support a variety of important agricultural activities, including grazing livestock and grain crop production. These soils can also be improved over time through the use of regenerative farm practices. In many parts of the

province, active farmland has been zoned as rural, not agricultural land, making it subject to development pressures and unrestricted growth. CLI Class 1-6 farmland deserves to be protected from unnecessary development.

The NFU-O recommends an expansion to the definition of prime agricultural lands in the Proposed PPS to include CLI Class 1-6 soils and for the government, using a provincially-mapped Agricultural System, to correctly identify and zone as “agricultural” all currently active farmland.

### **Sustainable and Affordable Housing Strategy**

Very little of the recently passed Bill 23 or the Proposed PPS actually address the crisis of affordable housing in the province. We agree with [diverse Ontario constituents](#) who are calling for the Government to finance the construction of subsidized housing stock within liveable, walkable communities. Co-operative and/or subsidized public housing initiatives are urgently required within both our large urban centres and within existing rural municipalities and hamlets.

We do not need to create policies that support more sprawl housing on our finite agricultural land; what we do need are policies that support truly affordable housing in areas close to where Ontarians work, including farm workers and labourers that the agri-food industry depends upon.

The NFU-O recommends that the Ontario government directly fund the construction of subsidized public housing and incentivize co-operative housing initiatives within pre-existing urban and rural boundaries.

We also recommend that the Government sit down with all accredited farm organizations to discuss policies that will ensure farmland is owned by farmers and that farmland costs are within reach of the province’s aspiring agriculturalists.

### **Conclusion**

Farmland protections in the current *Provincial Policy Statement* and *A Place to Grow* already work well to allow limited and controlled development in and surrounding Ontario’s agricultural lands. We don’t need to fix what isn’t broken.

NFU-O farm leaders would welcome working with the province to develop policies that will ensure farmland is permanently protected and is affordable for the next generation of farmers.

Sincerely,



Max Hansgen, President  
National Farmers Union – Ontario

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs