



# YORK REGION

## FEDERATION OF AGRICULTURE

SERVING THE FARM COMMUNITY SINCE 1940

May 10, 2024

Provincial Land Use Plans Branch  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 13th Floor  
Toronto, ON M7A 2J3

Submitted online via the Environmental Registry of Ontario (ERO)

Dear Ministry of Municipal Affairs and Housing Officials:

RE: Review of proposed policies for a new provincial planning policy instrument (ERO #019-8462)

The York Region Federation of Agriculture (YRFA) is a non-profit general farm organization representing over 600 registered farm business members in York Region. We are farmers working for farmers on issues, legislation and regulations affecting farms in the Region as well as decisions that will affect the preservation of agricultural land and the sustainability of agricultural businesses into the future. We are passionate and dedicated to ensuring the agriculture sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of the agriculture sector in the York Region and across Ontario.

YRFA appreciates this opportunity to provide input with respect to ERO #019-8462 Review of proposed policies for a new provincial planning policy instrument. YRFA agrees with and supports the recommendations that have been put forward by the Ontario Federation of Agriculture (OFA). The summary of these recommendations are as follows:

Summary of key Recommendations:

1. YRFA thanks the government for updating the proposed Provincial Planning Statement (proposed PPS2024) to include the following recommendations made by OFA:
  - a. To not carry forward previously proposed policies that would have permitted the creation of three additional residential lots per parcel in prime agricultural areas;
  - b. To permit more housing on farms to support farmers, farm families and farm workers without creating new lots, through enhanced policy and criteria supporting additional residential units;
  - c. Require planning authorities to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base; and
  - d. State that impacts from any new or expanding non-agricultural uses on the agricultural system, or where avoidance is not possible, are to be minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

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2. YRFA recommends explicitly stating that only one new residential lot may be created in a prime agriculture area per farm consolidation in the case of the severance of a residence surplus to an agricultural operation and that the new residential lot must include the surplus residential dwelling and any associated additional residential units.
3. YRFA recommends revising the meaning of “prime agricultural lands” to include soil class 4 farmland, and adding the meaning of “farm consolidation”, in the definitions section of the PPS.
4. YRFA recommends developing and releasing provincial guidance with respect to:
  - a. Additional Residential Units located on a lot in a Prime Agricultural Area, including application of Minimum Distance Separation (MDS);
  - b. Lot creation in prime agricultural areas;
  - c. Agricultural Impact Assessments; and
  - d. Required information for the implementation of the Agricultural System approach including mapping.
5. YRFA recommends a greater emphasis be placed on intensification and redevelopment by setting fixed urban boundaries and mandating planning authorities to meet significant minimum targets for intensification and redevelopment within built-up areas.
6. YRFA recommends that no settlement area boundary expansions be permitted unless all established minimum requirements for intensification and redevelopment within the existing built-up area have been met. When identifying a new settlement area or allowing a settlement area boundary expansion, YRFA recommends that planning authorities be required to demonstrate that criteria were considered, including:
  - a. whether the applicable lands comprise specialty crop areas;
  - b. the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, demonstrate reasonable alternatives on lower priority agricultural lands in prime agricultural areas were considered;
  - c. whether the new or expanded settlement area complies with the minimum distance separation formulae; and
  - d. whether impacts on surrounding agricultural operations and lands as well as the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

YRFA appreciates the opportunity to provide feedback on the proposed PPS2024 policies.

Sincerely,

Darryl Hamilton  
President  
York Region Federation of Agriculture

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