



October 2, 2019

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

RE: ERO Registry # 019-0279 for input on Provincial Policy Statement Review – Proposed Policies

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. We protect farmland in order to ensure a safe and sustainable food supply for future generations of Ontarians. OFT achieves this through direct land securement, stewardship, policy research and education.

Thank you for the opportunity to submit feedback on the proposed amendments to the Provincial Policy Statement (PPS). OFT has played an active stakeholder role in other provincial land use planning policy reviews, including the review for the 2014 PPS, and is pleased to continue working with the Province to refine and strengthen the policy direction in Ontario.

The OFT applauds the Ministry's ongoing commitment to the Agricultural System, and the recognition of the need for farmland protection within a broader network of supportive infrastructure, agricultural services, distributors, and processors. As such, we appreciate the strong emphasis on the Agricultural System as a whole that has been adopted in this version of the PPS. Additionally, we commend the use of consistent language across documents, including the adoption of language similar to that used in the *Agricultural Impact Assessment (AIA) Guidance Document*¹. Consistent language between and within documents is necessary for greater regularity in policy direction and implementation, To ensure farmland is adequately protected as part of a robust agricultural sector.



The Ontario Farmland Trust has the following recommendations to strengthen the proposed amendments to the Provincial Policy Statement:

- 1) OFT recommends that settlement area boundary adjustments affecting Prime Agricultural Areas only be permitted as part of a Municipal Comprehensive Review (MCR).** The current proposal to allow settlement area boundary adjustments outside of an MCR threatens to revert to an ad hoc approach to planning whereby municipalities respond to development proposals rather than planning in advance. This ad hoc approach has the potential to needlessly place farmland at risk. It is imperative that boundary adjustments respond to a demonstrated need for growth and are data-driven. Furthermore, we recommend that an Agricultural Impact Assessment be mandatory for all settlement boundary adjustments to minimize any impact on the integrity of the Agricultural System. These measures will help to achieve sustained or enhanced Agricultural System viability. Affected sections: 1.1.3.9.
- 2) OFT recommends that the reference to the minimum distance separation formulae be reinstated in section 2.3.6.1.** Mandatory buffers or setbacks will help to reduce incompatibility issues with non-agricultural uses and ensure that farmers can continue running financially sustainable farm businesses employing normal farm practices. This will ensure that non-agricultural uses in prime agricultural areas meet the requirements of the minimum distance separation formulae for new land uses in prime agricultural areas, as outlined in section 2.3.3.3. Additionally, we recommend that all buffers required by the minimum distance separation formulae be provided on the land proposed for development rather than on the adjacent agricultural land. This will ensure that prime agricultural land is not ‘sterilized’ as a result of incompatible adjacent land uses. Affected sections: 2.3.6.1.
- 3) OFT recommends the definition of “On-farm diversified uses” be altered to exclude ground-mounted solar facilities from being permitted in prime agricultural or specialty crop areas.** This will ensure that valuable farmland is not lost to non-agricultural development, which would affect the long term health of the farmland. **If ground-mounted solar facilities are to be permitted, greater clarity should be provided on area limitations.** This definition should match what the *Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas* outlines, where on-farm diversified uses are limited to 2% of a property’s area to a maximum of 1 hectare². Affected definition: “On-farm diversified uses”.
- 4) OFT recommends that an Agricultural Systems guidance document be provided and that the Agricultural Land Base Map be expanded province-wide.** While we commend the broader adoption of the Agricultural System terminology in the proposed PPS changes, greater direction for municipal implementation of this approach is needed. The approach should be implemented province wide. The guidance provided in *Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe*³ would be a valuable reference when adapted to a Province-wide context. The expansion of the Agricultural Land Base Map will support broader adoption of the Agricultural Systems approach and enhance the viability of agriculture provincially.



Thank you for this opportunity to share our recommendations and feedback on the Provincial Policy Statement Review Proposed Policies. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further.

Most Sincerely,

Kathryn Enders
Executive Director
Ontario Farmland Trust

References:

[1] Ontario Ministry of Agriculture, Food and Rural Affairs. 2018. *Draft Agricultural Impact Assessment (AIA) Guidance Document*. <http://www.omafra.gov.on.ca/english/landuse/aiagd.pdf>

[2] Ontario Ministry of Agriculture, Food and Rural Affairs. 2016. *Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas*.
<http://www.omafra.gov.on.ca/english/landuse/facts/permitteduseguide.pdf>

[3] Ontario Ministry of Agriculture, Food and Rural Affairs. 2018. *Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe*.
<http://www.omafra.gov.on.ca/english/landuse/agsys-ggh-final.pdf>