



April 28, 2022

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay St., 17th Floor
Toronto, ON
M7A 2J3

RE: The Community Infrastructure and Housing Accelerator Tool

Dear Minister Clark,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario's farmlands and associated ecological lands through direct land securement, stewardship, policy research and education. Our goal is to ensure a safe and sustainable food supply for future generations in this province by protecting farmland in perpetuity.

Ontario's farmland is a finite and non-renewable resource. It is the foundation of one of the province's largest economic sectors, the agri-food sector. The provincial agri-food sector contributes over \$47 billion to the GDP and employs more than 837,000 Ontarians along the supply chain¹. In rural areas, this sector is even more important, as roughly 12% of the GDP and 10% of rural jobs are associated with agriculture². Currently, only 0.5% of Canada's agricultural soil is classified as Class 1, and about half of the entire country's Class 1 soil is found in southern Ontario³. As such, it is crucial to protect Ontario's farmlands from non-agricultural development for the long-term viability of the province's agri-food sector.

In the most recent *Amendment to the Greenbelt Plan- Growing the Size of the Greenbelt*, the Province showed an interest in strengthening the Greenbelt by expanding it to include 13 new urban river valleys, which OFT would like to commend. Urban river valleys are beneficial to urban agriculture as they provide a reliable source of water for farmland within cities as well as enrich the surrounding soils. OFT recognizes the Province's ongoing commitment to Ontario's agricultural sector and appreciates the efforts to protect vital water systems through the expansion of the Greenbelt. We encourage you to do more to permanently protect more of the provincial farmland resource.

However, OFT is concerned about the recent proposal on March 30, 2022, to make changes to the *Planning Act* with the introduction of the *More Homes for Everyone Act* and specifically, the *Community Infrastructure and Housing Accelerator Tool*. While OFT acknowledges the housing needs of our growing population, those needs should not come at the expense of compromising the farmland that will nourish and sustain these same residents.



The Community Infrastructure and Housing Accelerator Tool proposes to expand the use of Minister's Zoning Orders (MZOs). Initially, MZOs were introduced into provincial legislature to allow for the Minister to make decisions over land that had no official plan⁴, and in very specific extenuating circumstances when a provincial issue was in question. MZOs are still described on the Ministry of Municipal Affairs site as rarely used in municipalities that have existing zoning by-laws⁴. However, the current provincial government has introduced more MZOs in the past couple years than previous governments introduced in the ten years prior. Many of these MZOs expedite residential development in areas where there is complete and comprehensive municipal land use planning in place. This shows a disregard for the intended purpose of this legislative tool and sets a dangerous precedent that MZOs may be used to forego the processes that have been put in place to protect Ontario's finite resources, including agricultural land. The introduction of the Housing Accelerator Tool proposes to expand this practice. This is of great concern to the Ontario Farmland Trust.

With the introduction of the Infrastructure and Housing Accelerator Tool, OFT fears that significant developmental pressures on farmland in rural communities will increase and that additional prime farmland will be lost for production. Without public consultation or an official planning review, there are no opportunities for the voices of local farmers and stewards of the agricultural land to be heard and understood. Thousands of acres of valuable farmland that lie outside of the Greenbelt are left vulnerable and unprotected.

For this reason, OFT would like to respectfully request that the proposed new guidelines prioritize protections for farmland and associated ecological areas that fall outside of the Greenbelt as part of this new legislation.

We trust that bringing this to your attention will emphasize the importance of protecting farmland specifically in southern Ontario where the most essential component of the resource is located. This is essential to support a resilient local food system. The recent atrocities in Ukraine coupled with the issues arising from the COVID-19 crisis have strongly underscored this need and highlight food security as a global concern. We hope that in the creation of more housing in this province, farmland is not targeted in the crossfire. Agricultural land is a limited, non-renewable resource and we sacrifice it to the peril of future generations. It is also a large contributor to our economic success as a province and we urge you to protect it.

Thank you for the opportunity to share our feedback. If you have any questions or would like to speak further on these issues, please do not hesitate to get in touch. We look forward to continuing to work with the Province to strengthen the agricultural system and protect the viability of the agricultural sector.

Most Sincerely,

Bernard Pope
Board Chair
Ontario Farmland Trust

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Cc:

The Honourable Doug Ford, Premier of Ontario
The Honourable Caroline Mulroney, Minister of Transportation
The Honourable Marie-Claude Bibeau, Minister of Agriculture and Agri-food
The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs
The Honourable Kinga Surma, Minister of Infrastructure
The Honourable David Piccini, Minister of Environment, Conservation and Parks
Anne Bell, Director of Conservation and Education, Ontario Nature
Megan Sipos, Research and Policy Analyst, Greenbelt Foundation
Tim Gray, Executive Director, Environmental Defence
Krista Long, Executive Director, National Farmers Union—Ontario
Suzanne Armstrong, Director of Policy and Research, Christian Farmers Federation of Ontario
Jason Bent, Director of Policy Research, Ontario Federation of Agriculture

References:

- [1] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Ontario Federation of Agriculture. 2013. Economic Contribution of the Ontario Farm Sector 2013. <https://ofa.on.ca/resources/economic-contribution-ontario-farm-sector-2013/>
- [3] Environment Canada. 1976. Canada Land Inventory: Land Capability for Agriculture. [https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agric_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%20%20to%203%20soils\).](https://atrium.lib.uoguelph.ca/xmlui/bitstream/handle/10214/15222/LUPSD_land_capability_agric_rep10_1976.pdf?sequence=1&isAllowed=y#:~:text=6.,Class%20%20to%203%20soils).)
- [4] Ontario Ministry of Municipal Affairs and Housing. 2020. Citizen’s Guide to Land Use Planning. <https://www.ontario.ca/document/citizens-guide-land-use-planning/zoning-bylaws#section-1>