



May 25, 2023

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

RE: Provincial Agricultural System, ERO #019-6813 for review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Dear Minister Clark,

I am writing on behalf of the Ontario Farmland Trust (OFT) to express our concerns regarding the proposed changes found in the proposed Provincial Policy Statement, 2023 (PPS 2023). Specifically, OFT is concerned about the impact the proposed policies will have on agricultural lands in the province.

Ontario's prime agricultural land is a finite, non-renewable resource that comprises less than 5% of Ontario's land base¹. With the growing rate of farmland loss in the province, currently at a rate of 319 acres per day², it is more important than ever before that the province protects our prime areas. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 750,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP³.

While OFT recognizes the need to address issues of housing availability and affordability, our organization is concerned that several of the policies in the proposed PPS 2023 will not adequately contribute to the housing issues and instead will create significant issues for the long-term viability of Ontario's agri-food sector. This submission will focus primarily on the proposed PPS 2023 impacts on the agricultural system. However, OFT has a breadth of concerns regarding several of the proposed policies and Ontario's agricultural land that is addressed in other submissions.

Comments regarding Agricultural Systems and the proposed PPS 2023

While OFT appreciates the attempt to adapt the Growth Plan policies pertaining to agricultural system mapping into the PPS 2023, the language undermines the previous requirement for municipalities in the Greater Golden Horseshoe from requiring them to use agricultural systems. S4.3.1 states, "planning authorities are encouraged to use an agricultural system approach." The use of the word 'encouraged' is not strong enough and will not require municipalities to use the provincial agricultural system mapping. Given that this is now optional for municipalities, it will decrease the likelihood of adopting agricultural systems mapping and create fragmented agricultural systems between municipalities. This is partly due to the added responsibility on rural municipalities that tend to have more limited resources to complete agricultural system mapping that the province would otherwise support. The use of a provincial agricultural systems approach to planning is crucial to protect agricultural land given its importance as an economic driver and in recognition of the natural heritage and hydrological features and functions that farmland plays⁴.



Recommendation 1: The province should amend the language in the proposed PPS 2023 that requires agricultural system mapping for all municipalities.

OFT noted the removal of the policy language which stated, “planning authorities shall designate prime agricultural areas and specialty crop areas in accordance with guidelines developed by the Province.” Instead, the proposed s.4.3.1.2 states, “as part of the agricultural land base, prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture.” There is concern as to the various approaches that municipalities may choose to take on designating prime agricultural areas. Provincial guidelines should remain the standard by which municipalities designate prime agricultural areas, in order to ensure a consistent approach across municipalities. By removing this policy, the province is risking inconsistent approaches to designating prime agricultural areas which can lead to further farmland fragmentation, particularly between municipal boundaries. It is important to note that farmland fragmentation makes farming practices significantly more challenging and creates an assortment of land-use conflicts. While the policy states that prime agricultural areas and specialty crop areas shall be designated and protected for long-term use for agriculture, s.4.3.3 permits up to three lot severances per farm parcel, which undermines the protection s.4.3.1.2 states it is intended to provide. OFT has submitted another detailed response that addresses these concerns in greater detail, however, it is important to highlight here the contradictory nature of these sections: S.4.3.3 needs to be removed in order to protect the agricultural system that the PPS 2023 proposes needs to be protected.

Recommendation 2: The PPS 2023 should include the requirement for municipalities to use the guidelines developed by the province to designate prime agricultural areas and specialty crop areas.

Recommendation 3: S.4.3.3 should be removed in its entirety as it undermines and contradicts the notion of a contiguous agricultural system.

We acknowledge that the policy provides opportunities for housing for new and young farmers during succession planning and transitioning the farm to new operators. However, municipalities should be permitted to allow for additional restrictions to help protect prime agricultural areas and mitigate the likelihood of conflict arising. The proposed s.4.3.3.2 prevents municipalities from being able to be more restrictive and prevent these types of conflicts, as well as utilize their own local knowledge and context for their communities needs, such as rural communities whose economies are heavily based on agricultural production. The weakened policies on utilizing provincial frameworks for designating prime agricultural areas as well as agricultural system mapping will put these rural and agricultural communities at risk.

Recommendation 4: S.4.3.3.2 should be removed in order to allow rural and agricultural communities the ability to properly protect their agricultural system, rural character, and implement local context into their official plans and zoning by-laws.



We urge the province to reconsider the proposed policy changes that have weakened the requirements for municipalities to implement an agricultural system and limit their ability to include more restrictive provisions to protect their rich agricultural land base and economies. This will help ensure the long-term viability of agriculture in Ontario and protect the agri-food sector's significant contributions to the province's GDP and employment numbers.

Sincerely,

Martin Straatnof, Executive Director
Ontario Farmland Trust

Cc: Bernard Pope, Chair of the Board of Directors, Ontario Farmland Trust
Hon. Lisa Thompson, Minister of Agriculture, Food & Rural Affairs
Rob Flack, Parliamentary Assistant to Minister of Agriculture, Food & Rural Affairs
Trevor Jones, Parliamentary Assistant to Minister of Agriculture, Food & Rural Affairs
Kevin Holland, Parliamentary Assistant to the Minister of Municipal Affairs and Housing
Michael Parsa, Associate Minister Municipal Affairs and Housing



References

- [1] Ontario Ministry of Agriculture, Food and Rural Affairs. 2016. Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas. Retrieved from <http://www.omafra.gov.on.ca/english/landuse/facts/permittedduseguide.pdf>
- [2] Statistics Canada. 2021. Census of Agriculture. Retrieved from <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3210015301&pickMembers%5B0%5D=1.7&cubeTimeFrame.startYear=2001&cubeTimeFrame.endYear=2021&referencePeriods=20010101%2C20210101>
- [3] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. Retrieved from <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [4] Ontario Ministry of Agriculture, Food and Rural Affairs. 2020. Implementation Procedure for the Agricultural System in Ontario's Greater Golden Horseshoe. Retrieved from <http://www.omafra.gov.on.ca/english/landuse/imp2019.pdf>