

December 22, 2022

Provincial Land Use Plans Branch
13th Flr, 777 Bay St
Toronto, ON M7A 2J3
growthplanning@ontario.ca

Re: ERO 019-6177 Review of A Place to Grow and Provincial Policy Statement

Dear Planning Consultation Staff,

The National Farmers Union - Ontario (NFU-O) is writing to express our concern with the potential threats to farmland presented by ERO-019-6177 Review of a Place to Grow (APTG) and Provincial Policy Statement (PPS). We are concerned that the government's stated goal of building more houses for Ontarians, and the regulatory changes proposed through Bill 23, will come at the expense of farmland.

The NFU-O is an accredited farm organization representing thousands of sustainable farmers in Ontario and has advocated for farmers across Ontario and Canada since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farmers, while protecting and enhancing rural environments for current and future generations.

The NFU-O has long advocated farmland protection measures within the [Provincial Policy Statement](#) and [A Place to Grow](#), especially those that ward against urban sprawl and aggregate extraction on our finite and irreplaceable farmland. We are concerned that protections on agricultural land and other policies beneficial to agriculture and rural communities may be lost or changed in this process.

A Place to Grow takes a critical holistic view of planning by working in conjunction with the Greenbelt Plan, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan and bolsters the PPS with a framework to balance growth in Canada's most densely populated area with environmental and farmland protections. The NFU-O insists that the government uphold the holistic planning framework spelled out within A Place to Grow.

By changing the language of density targets from people and jobs per hectare to number of homes, this proposed province-wide planning policy framework threatens unnecessary and uninformed sprawl on prime farmland. We request that the APTG's growth targets be upheld.

The NFU-O is deeply concerned by the potential loss of the Agricultural Systems approach to land-use planning. We strongly encourage the ongoing use of this approach within municipalities of the Greater Golden Horseshoe and would support the expanded use of this tool in other municipalities across the province. A key tool within the Agricultural Systems

approach is the use of Agricultural Impact Assessments (AIAs). It is imperative that the use of AIAs continues in the province to ensure that agricultural systems are not negatively impacted.

Equally important, Natural Heritage Systems mapping ensures that ecologically-sensitive areas, like marshes, wetlands, and ravines are not swallowed up by sprawl. NFU-O farmers know that protecting natural heritage features near and on their farms is crucial to maintaining clean water supplies, flood mitigation, healthy soils, and wildlife diversity.

We are equally worried that a streamlined province-wide planning policy framework will weaken Minimum Distance Separation (MDS) policies that are crucial to mitigate conflicts between farming operations and surrounding land uses, including residential developments. MDS policies need to be upheld province-wide and support for OMAFRA's training and online tools to support municipal implementation of MDS policies should be continued.

We also warn against regressing to pre-1996 residential lot creation policies. This will lead to an increase in farmland lot severance for aggregate extraction and development without the necessary power, water, sewage, and transit infrastructure. Relaxed residential lot creation policies will lead to agricultural land base fragmentation, increased conflicts between neighbouring land users, overinflation of farmland prices, and increased municipal costs. We are opposed to any policies that will allow for residential lot creation on any farmland in the province.

The NFU-O is concerned about unmet local housing needs in rural areas, but we are troubled that the government appears to only be working with developers to "solve" the housing crisis. The provincial government needs to sit down with farm organizations, farmers, and affordable housing organizations to ensure the right kind of housing is available for rural communities while protecting prime agricultural and rural lands for farming.

The loss of any of the farmland and natural heritage protections contained within the PPS and Growth Plan present a risk to Ontario's dwindling base of prime farmland, a crucial non-renewable resource at the center of one of Ontario's largest economic sectors and the basis of our food security. It is imperative that we plan for community growth using principles of gentle density rather than sprawl to ensure we maintain the farmland base that will continue to feed Ontario.

Sincerely,



Max Hansgen,
President, National Farmers Union - Ontario