



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: Intensification, Municipal Comprehensive Review, and Settlement Area Expansion, 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 agricultural 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 sections of the proposed PPS 2023 dealing with intensification, municipal comprehensive reviews, and settlement area expansion. 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 proposed changes to intensification, municipal comprehensive reviews, and settlement area expansion

OFT has significant concerns regarding the proposed policy changes found in the PPS 2023 regarding intensification targets, municipal comprehensive reviews, and settlement area expansion. These policies should ensure strategic growth for communities while protecting highly valuable farmland. However, while the proposed PPS 2023 generally states support for intensification, it does not require targets for municipalities across Ontario and provides many permissions that would undermine attempts at intensification. Additionally, the intensification targets for many municipalities in the Growth Plan have been reduced or removed altogether, which will use up lands in municipal boundaries faster and lead to increased rates of urban boundary expansion. Without the requirement to complete municipal comprehensive reviews, this poses a significant threat to farmland. As noted below, reducing and eliminating density targets is contrary to encouraging complete communities found within the proposed



PPS. This will lead to fragmented patterns of development, including when settlement boundary expansion occurs.

OFT has noted concerns under s.2.3, Settlement Areas and Settlement Area Boundary Expansions. The policy in s.2.3.2 now states that "land use patterns within settlement areas **should** be based on densities and a mix of land uses". The province opted to change the language from "shall" to "should", which weakens the policies that are meant to support intensification. Additionally, the language that states land use patterns should "minimize negative impacts to air quality and climate change, promote energy efficiency" and "prepare for the impacts of a changing climate" has been removed. This is concerning given the climate crisis we are facing and that agriculture relies on healthy and stable ecosystems to produce a consistent supply of quality local food. By removing this language, the province is undermining the future viability of the agricultural sector, the largest sector of the Ontario economy.

Recommendation 1: The province should use stronger language in s.2.3.2 that will require municipalities to adopt land use patterns that support density targets and also minimize negative environmental impacts.

Furthermore, s.2.3.3 states that "planning authorities should support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities." Once again, the use of "should" is not strong enough to ensure the deliverables of complete communities. Furthermore, the policy no longer requires planning authorities to identify appropriate locations or take stock of suitable existing sites, eroding the possibility of efficient land use. While OFT encourages the use of complete communities in the planning framework, the removal of intensification targets will not only have severe impact to farmland but it will undermine the existing urban planning framework to achieve complete communities.

Recommendation 2: The province should use stronger language in s.2.3.3 that will require municipalities to identify appropriate locations for intensification.

The policy on settlement area expansion has also been weakened, which will further threaten Ontario's prime agricultural land. A major concern is removing the requirement of a municipal comprehensive review that demonstrates the need for expansion. Additionally, the language in s.2.3.4 has been changed from "shall" to "should" which weakens the policy, making it possible for development to occur on prime agricultural lands. While proposed s.2.3.4.b states that applicable lands do not comprise specialty crop areas, this is a subsection under s.2.3.4 which states planning authorities "should" consider this. Since the language does require planning authorities to consider this, there is the likelihood of it still occurring. This is also the case for s.2.3.4d regarding impacts on agricultural lands and operations that are adjacent or close to the settlement.

Recommendation 3: The province should require municipal comprehensive reviews prior to settlement boundary expansion and require the planning authority to demonstrate the need. Furthermore, the province needs to adopt stronger language in s.2.3.4 that ensures the applicable lands do not comprise specialty crop areas and that prime agricultural areas are avoided to the greatest extent possible as determined through an agricultural impact assessment.



OFT has also noted the removal of policies from s.2.6 Rural Lands in Municipalities, in particular, “when directing development on rural lands, a planning authority shall apply the relevant policies of Section 1: Building Strong Healthy Communities, as well as the policies of Section 2: Wise Use and Management of Resources and Section 3: Protecting Public Health and Safety.” OFT is suggesting that the removal of this policy will undermine the future resiliency of rural communities.

Recommendation 4: The province should reinstate the policies pertaining to directing development on rural lands that require planning authorities to apply relevant policies that support strong and resilient communities as found in the Provincial Policy Statement, 2020.

Finally, there is concern pertaining to the language in s.2.1.1 that states, "sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 25 years." As noted above, without improving language and goals pertaining to density targets, it will be increasingly difficult for municipalities to plan accurately for beyond 25 years. This will likely lead to further settlement area expansion to accommodate the likelihood of urban sprawl, which will reduce investments in agricultural operations surrounding urban boundaries.

Recommendation 5: The province should maintain the current requirement for planning authorities to plan for up to 25 years in order to minimize unnecessary and premature settlement area expansion.

In conclusion, the proposed changes to intensification targets, municipal comprehensive reviews, and settlement area expansion weaken policies that would ensure strategic growth for communities while protecting highly valuable farmland. The use of weaker language and the removal of requirements will lead to increased rates of settlement boundary expansion and further threaten farmland and the agricultural sector. It is essential that the policies are strengthened to ensure efficient land use and protect Ontario's agricultural operations and communities.

Sincerely,

Martin Straathof, 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/>