



# YORK REGION

## FEDERATION OF AGRICULTURE

SERVING THE FARM COMMUNITY SINCE 1940

May 6, 2023

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
17th Floor, 777 Bay Street  
Toronto, Ontario  
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Sent via email to: [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca) and [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca)  
and submitted online through the Environmental Registry of Ontario

Dear Minister Clark,

**Re: ERO 019-6821 - Proposed *Planning Act*, *City of Toronto Act, 2006*, and *Ministry of Municipal Affairs and Housing Act Changes (Schedules 2, 4, and 6 of Bill 97 - the proposed Helping Homebuyers, Protecting Tenants Act, 2023)***

The York Region Federation of Agriculture (YRFA) represents over 600 farm family members in the Region on matters affecting their farms now and into the future.

We appreciate the opportunity to provide our comments with respect to Schedule 6 of Bill 97 which makes various amendments to the *Planning Act*, including:

“A new subsection 47 (4.0.1) is added to provide that the Minister may, in an order made under clause 47 (1) (a), provide that policy statements, provincial plans and official plans do not apply in respect of a licence, permit, approval, permission or other matter required before a use permitted by the order may be established.”

Section 47 of the *Planning Act* allows you as the Minister of Municipal Affairs and Housing (“Minister”) to make “Minister's Zoning Orders” (“MZOs”), to govern land uses within areas subject to the order. We note that significant acres of farmland have been lost to development because of Minister’s Zoning Orders (MZOs) to date.

YRFA works tirelessly to advocate for the protection of farmlands for their long-term ability to produce food, fibre, and fuel.

YRFA believes that farming to produce food, fibre, fuel, flowers, and nursery stock is the best use for farmland. Farmland is a finite resource, that makes up less than five percent of the land in the province. It’s vital that Ontario has a strong, viable and sustainable supply of food products grown, harvested, and processed right here at home. Ontario’s shrinking agricultural land base is alarming. The current rate of loss is measured at 319 acres per day in our province, according to the 2021 Census of Agriculture. These losses are not sustainable.



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The protection of prime agricultural areas for their long-term agricultural use must be a key objective. It is one thing to think about housing the anticipated additional two million people that will reside in Ontario over the next ten years, but it is another to think seriously about how we will feed this increased population. Ontario's agricultural lands are a finite and shrinking resource. We cannot sustain continuing losses of agricultural land while maintaining our ability to produce food from this limited and declining agricultural land base. Therefore, any proposals looking at increasing housing supply must be done with consideration to the needs and support of the agricultural community.

YRFA endorses the 2020 Provincial Policy Statement (PPS 2020)'s Agriculture policies [Section 2.3] that require municipalities protect their prime agricultural areas for their long-term agricultural use. We further support the flexibility afforded to farmers to engage in on-farm value adding of primary farm products, as well as agriculture-related, on-farm diversified and agri-tourism uses. Although the PPS 2020 defines prime agricultural land as Canada Land Inventory (CLI) Class 1-3 soils plus specialty crop areas, the YRFA believes that prime agricultural lands should be defined as Class 1 to 4 soils plus specialty crop lands. Class 5-6 soils that are part of an ongoing agricultural operation deserve protection too. These soils can support agricultural activities such as grazing livestock or growing crops for biofuels, and their productivity can be improved through activities such as tile drainage, stone picking and the addition of lime. Where Class 1-4 soils are not present in a county or region, the best agricultural lands in that county or region should be recognized and protected for their agricultural use.

YRFA is a strong supporter of the preservation of Prime Farmland classes 1, 2, 3 & 4 plus specialty crop lands across Ontario. We believe strongly in the PPS 2020 Agriculture policies that governs farmland and rural areas protecting the right to farm and the Agriculture System in Ontario. In addition to this, YRFA believes strongly that lot creation and further fragmentation of farmland in the rural area is counterproductive for the agricultural business structure in Ontario's rural areas. YRFA supports additional residential units on existing farm parcels (but not on a severed lot from the farm parcel), and in rural hubs, hamlets, and communities to support our agricultural system.

YRFA does not support amendments to the *Planning Act* that would give the Minister or any other planning authority the ability to make planning decisions which are not consistent with the PPS 2020. The policies of the PPS 2020 represent the minimum standard in support of protecting the environment, farmland and public health and safety.

The PPS 2020 does not go far enough in protecting our finite agricultural lands. We strongly recommend strengthening of the PPS 2020 in order to require fixed urban settlement boundaries and policies requiring mandatory intensification within the existing built urban areas as well as mandatory "greenfield" density requirements to better utilize infrastructure, improve the financial viability of public transit and protect our prime agricultural lands from sprawl.



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YRFA does not support the *Planning Act* amendment specified in Schedule 6 of Bill 97 to give the Minister the ability to issue MZOs that are not consistent with policy statements, provincial plans and official plans. YRFA understands the need for the Minister to have the power of an MZO and we support MZO usage in areas of the province that are without robust local planning processes. We have no objection to MZOs being used within the lands that would be considered the Urban Envelope.

We are very concerned that amending the *Planning Act* to allow for planning decisions that are inconsistent with the PPS 2020 would result in developments that run counter to our overarching philosophy of farmland preservation.

YRFA appreciates the opportunity to provide our feedback and agricultural perspectives on the proposed *Planning Act* changes.

Sincerely,

Darryl Hamilton  
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cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs