



LONG-TERM THINKING FOR TODAY'S ISSUES

November 24, 2022

Attention: Planning Consultation
Ontario Ministry of Municipal Affairs and Housing
College Park, 13th Floor, 777 Bay St.
Toronto, ON
M7A 2J3
Via email: planningconsultation@ontario.ca

**Re: ERO 019-6163 Proposed Planning Act and City of Toronto Act Changes
(Schedules 9 and 1 of Bill 23 – the proposed More Homes Built Faster Act, 2022)**

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about the protection of productive agricultural land. This land is highly valuable as a source of food, as an economic driver, and as a provider of environmental goods and services.

The CFFO supports increased density within existing settlement area boundaries, and is in support of the proposals to increase “missing middle” development and increase density around transit stations. The CFFO has concerns about many of the other proposals and the potential impact for agricultural land loss and fragmentation, potential impacts on farming properties and businesses, and resources in rural municipalities.

The CFFO recommends that:

- Upper-tier planning is valuable and benefits farmers and rural and urban lower-tier municipalities.
- Third-party appeals should be permitted to the Ontario Land Tribunal in cases seeking correct application of laws and regulations (including Minimum Distance Separation formulae).
- Public and municipal input should continue on plans of subdivision and site plans.
- Current limits and requirements should remain on land lease communities.
- Aggregate applications should not be given special privileges.
- The process for Conservation Authorities to sever or dispose of lands should give full consideration to potential impacts.

Value of Farmland

Ontario's farmland is the foundation of the significant economic contributions of our overall agri-food sector. The sector has proven to be resilient and agile in adjusting to significant challenges and new opportunities. It will continue to be important to a strong Ontario economy far into the future – but only if our agricultural land base is protected.

Farmland also provides many important environmental goods and services including flood risk mitigation and wildlife habitat. Farmland and natural features together ensure greater environmental benefits and corridors for wildlife and water through the landscape.

Productive farmland is vital to our food security, here in Ontario and globally. Recent disruptions to supply chains and global food systems demonstrate the value of food producing land, especially close to home. All these benefits need to be considered when considering proposals that will permanently remove farmland from production.

The CFFO has long recognized that land use planning is a challenging process seeking to balance many different competing interests within a finite single landscape. In balancing provincial priorities, we should carefully consider the need to protect our valuable farmland and Agricultural System, especially in regions of the province where we have the highest quality, most productive farmland, and where growth pressure is most significant.

The CFFO recognizes the need for increased housing supply across the province and strongly encourages facilitating brownfield redevelopment, increasing density within settlement area boundaries, and prioritizing use of land currently designated for development without designating more farmland for future development.

Higher Density within Settlement Area Boundaries

The CFFO supports policies that will increase density within existing settlement area boundaries and encourage brownfield redevelopment and use of existing (especially vacant) buildings. We see these as effective and beneficial approaches to address the housing crisis, ensure efficient use of existing transit and municipal infrastructure while minimizing negative impacts on farmland and natural areas.

The proposal to increase missing middle development by allowing “as-of-right” three units per lot in existing residential areas across the province is a valuable step towards increasing density within settlement areas. **The CFFO supports proposed changes to increase “missing middle” development within settlement areas where full municipal water and sewage services are available. The CFFO also supports proposals to change zoning by-laws to facilitate transit supportive densities.**

Streamlining Municipal Planning Responsibilities

The CFFO is concerned about the proposed changes to remove planning policy and approval responsibilities from selected upper tier municipalities, including the regions of Durham, Halton, Niagara, Peel, Waterloo, York, and the County of Simcoe. The full implications of such a major change to land use planning are not clear, including implications this may have for increasing risks for farmland loss and fragmentation.

Planning at a regional level ensures more coordination, including around resources such as transit. Regional-level planning has been beneficial to farmland protection in many areas. Regional-level planning also allows greater access to planning staff resources which benefits all lower tier municipalities and is especially important for smaller lower-tier municipalities. **The CFFO is concerned that farmland loss and fragmentation will increase under a strictly lower-tier municipal planning regime.**

Third Party Appeals

The CFFO does not support the proposal to limit third party appeals for all planning matters. In particular, this will restrict farmer-landowners from access to appeals when changes to official plans or zoning by-laws affect their property or their business, but where they are not a key participant. As an example, it is important that farmers are able to access third-party appeals to ensure Minimum Distance Separation rules are correctly applied.

The CFFO requests that third-party appeals continue to be permitted in cases seeking correct application of laws and regulations (including Minimum Distance Separation formulae).

Public Meetings – Plans of Subdivision and Site Plan Exemptions

The CFFO is concerned about the proposal to remove the requirement for public meetings for draft plans of subdivision. The CFFO sees value in public input in the land use planning process, including these meetings. Relating to farming specifically, plans of subdivision often allow surrounding landowners, including farmers, to see plans and raise concerns about potential implications for their properties or businesses.

Similarly, site plans are useful when a development site abuts or impacts a farming property and their ability to carry on normal farm practices. Municipal regulation of site plans is valuable.

The CFFO requests that public input should continue for plans of subdivision and municipal oversight should continue for site plans.

Streamline Approval Process for Land Lease Communities

The CFFO is particularly concerned about the proposal to allow land lease communities to be approved via site plan control for a period up to 49 years. This puts increased risk, especially in rural areas, of poorly serviced housing that would then become entrenched for much longer periods of time. The CFFO does not support this proposed change.

The CFFO requests that current limits and requirements remain on land lease communities.

Facilitating Aggregate Applications

Amendments to official plans, secondary plans, and zoning by-laws to allow aggregate extraction applications at any time are likely to burden municipalities with extra costs and administrative burden. This will be particularly challenging for rural municipalities with lower overall budgets. The CFFO does not see benefit in this proposed change.

Aggregate applications should not be given special privilege with regard to official plans, secondary plans, or zoning by-laws that will burden municipal governments and taxpayers.

Conservation Authorities

The CFFO is concerned about the proposal to introduce a streamlined process for Conservation Authorities to sever and dispose of land. Conservation Authorities are being asked to consider land that they own that may be suitable for development purposes. Conservation Authority owned and controlled land is valuable for the conservation and environmental services that it provides, as well as the vital opportunities it creates for public access to greenspace for recreation and mental health.

Conservation Authority land is often adjacent to farmland and many farmers currently rent Conservation Authority owned land for farming purposes. The CFFO does not want to see any currently productive land that is rented to farmers turned over for development. The CFFO is also concerned about the implications of a streamlined process that may not allow public input or due consideration of the potential impact of development. Farm properties may be impacted by changes to the property in question, be they abutting or up or downstream.

The CFFO does not support a streamlined process for Conservation Authorities to sever or dispose of land.

Conclusion

In a context of increased pressure for housing, the CFFO strongly encourages increased density within existing settlement area boundaries as a primary focus for increasing housing supply. The CFFO supports proposals to increase “missing middle” development and increase density around transit stations.

The CFFO has concerns about many of the other proposals for changes to the *Planning Act* and the potential impact these may have for agricultural land loss and fragmentation, potential impacts on farming properties and businesses, and resources in rural municipalities. The CFFO sees value in Upper-tier planning, public and municipal input on plans of subdivision and site plans, and current limits and requirements on land lease communities. Third-party appeals to the Ontario Land Tribunal are a valuable tool to ensure farmers can protect their business interests. Due process should be required for aggregate applications and disposal or severance of lands by Conservation Authorities.

We appreciate this opportunity to provide input and thank you for your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario