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LONG-TERM THINKING FOR TODAY'S ISSUES

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April 28, 2022

Ministry of Municipal Affairs and Housing  
College Park, 23 Floor, Suite 2304  
777 Bay Street  
Toronto, ON M7A 2J3  
Via email: [planningconsultation@ontario.ca](mailto:planningconsultation@ontario.ca)

## **Re: ERO 019-5287 Seeking Feedback on Housing Needs in Rural and Northern Municipalities**

Dear Planning Consultation Staff,

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 has several recommendations for consideration relating to the potential impact on agriculture from proposed changes intended to address housing needs in rural and northern municipalities.

1. The CFFO requests consistent provincial mapping of prime agricultural areas across the province.
2. The CFFO supports affordable and appropriate worker housing on-farm and in local communities for seasonal and year-round farm workers.
3. The CFFO does not support increased lot creation in rural areas where the property and/or neighbouring properties are actively farmed.
4. The CFFO does not support increased lot creation in prime agricultural areas.
5. The CFFO supports permitting additional residential units on a farm property provided no future severance is possible for the added residence(s).
6. The CFFO supports intensification and redevelopment within settled areas of rural municipalities including through increased “missing middle” density increases.
7. The CFFO supports more housing options for vulnerable populations, such as seniors.
8. The CFFO encourages residential settlement within towns, hamlets and villages rather than through lot creation.
9. The CFFO encourages settlement away from agricultural land and onto less productive or non-productive land.

## Protecting Farmland

1. The CFFO requests consistent provincial mapping of prime agricultural areas across the province (as has been done in the GGH).

The CFFO is concerned about the long-term protection of our farmland across Ontario. All our farmland is a limited valuable resource. It provides a renewable source of human sustenance and vital environmental goods and services. It requires strong protections from permanent loss to settlement expansion through good land use planning.

Productive farmland is also the foundation of Ontario's agri-food sector, which, according to OMAFRA, "contributes \$46.3 billion to the provincial economy." The CFFO sees a significant role for agriculture as part of ensuring ongoing food security and as aiding in economic recovery and prosperity for the province.

Within the GGH region, the province has undertaken a process to define, identify and map prime agricultural areas. This ensures that a consistent definition is being applied in all municipalities across the region and that policies intended to apply to prime agricultural areas will be fairly applied.

The CFFO requests that the provincial government identify and map prime agricultural areas across the province, beginning with those counties outside the GGH which have the highest quality farmland in proximity to large settlements. This will ensure that provincial interests of protecting farmland are appropriately and fairly applied in all municipalities.

## Worker Housing

2. The CFFO supports affordable and appropriate worker housing on-farm and in local communities for seasonal and year-round farm workers.

Farmers face ongoing challenges in attracting and retaining workers. One of the challenges continues to be appropriate and affordable housing for farm workers with suitable access (either by proximity or transportation) to the worksite. Housing needs for seasonal and temporary workers are very different from the needs of workers who will live and work on the farm year-round. Both types of housing need consideration.

The CFFO supports efforts to find innovative solutions to better accommodate workers on-farm and within local communities. This includes ensuring there are appropriate rental opportunities and transportation options for workers and family members who do not live on-farm. It also includes finding building code regulations to allow suitable housing on-farm without adding risk of future severances or significant loss of workable farmland to housing.

## Lot Creation or Severances

3. The CFFO does not support increased lot creation in rural areas where the property and/or neighbouring properties are actively farmed.
4. The CFFO does not support increased lot creation in prime agricultural areas.
5. The CFFO supports permitting additional residential units on a farm property provided no future severance is possible for the added residence(s).

The CFFO does not support increased residential lot creation or severances in rural areas where the land in question and/or neighbouring properties are or have recently been actively farmed. It is not only our highest classes of farmland that deserve protection. All arable land has the capacity to produce food. Classes 4-7 land are often ideal for livestock production and can be improved for crop production through good stewardship. Microclimates for growing particular crops are found in different regions of the province beyond those currently defined as specialty crop areas.

The CFFO has long argued for the importance of continued protection of the highest quality farmland by region, even where that farmland may be defined as class 4 or lower. This helps to preserve the local food-producing capacity of each region and to preserve our overall food security as a province. The impact of severances or lot creation must be considered for all farmed land, not only prime agriculture land.

The CFFO does not support permitting new residential lot creation or severances in prime agricultural areas beyond what is permitted in the Provincial Policy Statement, 2020, which in section 2.3.4.1 (c) permits severance of a “residence surplus to a farming operation as a result of farm consolidation, provided that: 1. the new lot will be limited to a minimum size needed to accommodate the use and appropriate sewage and water services; and 2. the planning authority ensures that new residential dwellings are prohibited on any remnant parcel of farmland created by the severance. The approach used to ensure that no new residential dwellings are permitted on the remnant parcel may be recommended by the province, or based on municipal approaches which achieve the same objective.”

Severances, or lot creation, has been a controversial issue in the countryside and continues to cause problems, especially for farm operations. While the initial impetus for lot creation may be for family members, such as for a retirement property or adult siblings, once the lot is created there is no guarantee of a continuing relationship with abutting farming operations either as family or workers. These lots often end up purchased by those looking for a bucolic lifestyle away from the city, but who are unfamiliar with normal farm practices. This can create conflict between neighbours and increased risks for farm operations.

Rural lot creation outside settlement areas can have negative impacts on existing and future farming operations for many reasons. While Minimum Distance Separation rules must be followed based on existing operations, a new residence creates a “shadow” that may limit future establishment or expansion of animal agriculture operations within the vicinity of the new lot.

Farmland values can also be impacted. Allowing severances can unfairly increase the cost of farmland by encouraging overpayment for a parcel of farmland on the expectation of the subsequent severance and sale of a lot from that parcel to cover the added costs. This inflates farmland values in the area, which is particularly troubling for new and expanding farming operations.

## **Missing Middle in Rural Settlement Areas**

6. The CFFO supports intensification and redevelopment within settled areas of rural municipalities including through increased “missing middle” density increases.
7. The CFFO supports more housing options for vulnerable populations, such as seniors.
8. The CFFO encourages residential settlement within towns, hamlets and villages rather than through lot creation.

9. The CFFO encourages settlement away from agricultural land and onto less productive or non-productive land.

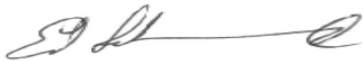
There is significant opportunity to increase density within rural settlement areas. This should include focus on intensification and redevelopment within settlement areas boundaries. Rural settlements can accommodate far more “missing middle” type density increases, including multi-unit housing of various types. These should focus on ensuring living accommodations suitable for family members and farm workers living off-farm and for seniors who wish to remain within their preferred community and maintain family and community connections through their entire lives.

## **Conclusion**

The CFFO emphasizes the importance of protection of farmland and the vitality of farm businesses in rural areas. We highlighted the importance of consistent mapping and protecting prime agricultural areas across the province. The CFFO supports affordable and appropriate worker housing on-farm and in local communities. The CFFO does not support increased lot creation on farmed land in rural or prime agricultural areas and discourages practices that may encourage requests for severances. The CFFO supports intensification and redevelopment within settled areas of rural municipalities including through increased “missing middle” density increases, including more housing options for vulnerable populations such as seniors. The CFFO encourages residential settlement within towns, hamlets and villages rather than through lot creation.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario