



LONG-TERM THINKING FOR TODAY'S ISSUES

April 28, 2022

Planning Consultation
Provincial Planning Policy Branch
Ontario Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3
Via email: PlanningConsultation@ontario.ca

Re: ERO 019-5285 Community Infrastructure and Housing Accelerator – Proposed Guideline

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 use of the Community Infrastructure and Housing Accelerator tool because of the potential impact it may have in overriding protections and accelerating development on productive farmland across Ontario.

The CFFO does not support the need for a tool such as this, which amounts to a workaround to undermine the existing land use planning process. The new Community Infrastructure and Housing Accelerator tool offers the possibility to circumvent the requirements of provincial plans, the Provincial Policy Statement and municipal official plans. Instead, the CFFO emphasizes the value of our current land use planning process which establishes rules to protect public and provincial interests, including farmland protection. The current planning process sets out rules for public consultation and long-term planning to fairly consider competing needs and interests on the single finite landscape of Ontario.

Undermining the current land use planning process will result in patchy development that does not fit within existing land use plans, creating potential for long-term conflict where competing adjacent land uses are not carefully considered. If changes are needed, the CFFO strongly recommends making improvements to the current process, rather than creating an alternate “work-around” process.

We understand that regrettably, this tool has already been introduced through amendments to the *Planning Act*, with the passage of Bill 109 on April 14, 2022. Nevertheless, we urge you not to proceed with its use. Should the government go forward with this workaround tool, however, the CFFO has some key recommendations to support the provincial interest to protect farmland through the use of this tool. In particular the CFFO recommends that:

- the guidelines indicate that a Community Infrastructure and Housing Accelerator order may not be made on specialty crop land, prime agricultural land or actively or recently farmed rural lands,
- minimum density targets be required for developments issued through this type of order, and
- conditions continue to require agricultural impact assessments where they would normally be required for the proposed development.

Value of the Current Land Use Planning Process

The CFFO recognizes that there are many competing interests for finite land resources in Ontario. Our most productive farmland is also within regions of the province under the most development pressure. To make the best decisions about how to balance development with preservation of farmland and natural areas, public input, local knowledge and long-term planning is necessary. This is not best achieved through developmental approvals made at a Ministry level designed to circumvent existing long-term land use plans. Where an existing planning process is already in place, the CFFO does not see the use of Community Infrastructure and Housing Accelerator orders as necessary or appropriate. The current process for public input and long-term planning does take time, but this is the best way to suitably protect provincial interests and balance the many competing demands for land use in our diverse communities in Ontario.

Protection of Farmland

As a farm organization, we are concerned about the protection of productive agricultural land.

Ontario's farmland is valuable as the foundation for the significant economic contributions of our overall agri-food sector. The agriculture and agri-food sector has proven to be resilient in economic downturns and agile in adjusting to significant changes and new opportunities. It is an important sector as we rebuild our Ontario economy. Farmland also provides many important environmental goods and services. Productive farmland is vital to our food security, here in Ontario and globally. All these benefits need to be appropriately considered when reviewing development proposals that will permanently remove farmland from production through the Community Infrastructure and Housing Accelerator order process.

It is not clear what, if any, processes are being proposed to weigh the importance of protecting productive farmland when considering issuing a Community Infrastructure and Housing Accelerator order. There are already examples of farmland being slated for development through the current Minister's Zoning Order process.

While the government has been clear that existing Greenbelt protections will be respected, there are no other indications in the proposed guidelines about how the value of farmland or natural areas will be considered in other regions of the province through the Community Infrastructure and Housing Accelerator order process.

Recommendations for Increasing Farmland Protection

The CFFO is pleased that the new proposed Community Infrastructure and Housing Accelerator order process will now include clear guidelines and conditions under which these orders can be issued. The CFFO wants to see farmland protection addressed in these guidelines.

The CFFO supports the current restriction that Community Infrastructure and Housing Accelerator orders may not be made within the Greenbelt Area boundaries. **The CFFO strongly recommends that this be expanded so that Community Infrastructure and Housing Accelerator orders may not be made on specialty crop land, prime agricultural land or actively or recently farmed rural lands across the province.**

Increasing density ensures that land used for development is gaining maximum benefit for the type of development proposed while minimizing loss to other land uses such as natural areas and agricultural land. **The CFFO recommends that minimum density targets should be required for developments issued through Community Infrastructure and Housing Accelerator orders.**

The CFFO is pleased to see that requirements for consultation are included in the guidelines. Consultation with the agricultural community is vital for any development proposal that may impact agricultural land, adjacent agricultural businesses, or components of the agri-food network within an area. The Agricultural Impact Assessment process offers clear guidelines for effective consultation with the agricultural sector on land use changes. **Minister-imposed conditions should continue to require agricultural impact assessments where they would normally be required for the proposed development.** They should also continue to recommend Agricultural Impact Assessments as a valuable tool for consultation with the agricultural sector concerning land use changes.

Conclusion

The CFFO is concerned that our best productive farmland will be put at greater risk through the process of granting Community Infrastructure and Housing Accelerator orders to expedite development projects. Clear guidelines for protecting farmland and considering the impact on farmland need to be part of the Community Infrastructure and Housing Accelerator order process beyond the Greenbelt areas.

In order to increase farmland protection, the CFFO recommends that a Community Infrastructure and Housing Accelerator order may not be made on specialty crop land, prime agricultural land or actively or recently farmed rural lands, that minimum density targets should be required for developments and that conditions should continue to require agricultural impact assessments where they would normally be required.

Ultimately, however, the CFFO sees the best land use planning decisions coming from our current land use planning process that includes public input, local knowledge and coordinated long-term planning. In regions of the province with established land use planning processes in place, the CFFO does not see the use of Community Infrastructure and Housing Accelerator orders as appropriate.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario