



November 16, 2022

The Honourable Steve Clark  
Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay St., 13th Floor  
Toronto, ON  
M5G 2E5

**RE: ERO Registry #019-6177 for input on the Review of A Place to Grow and Provincial Policy Statement**

Dear Minister Clark,

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated ecological lands through direct land securement, stewardship, policy research, and public education. Our goal is to ensure a safe and sustainable food supply for future generations in this province by protecting farmland in perpetuity.

With growing food insecurity in the province and the world, it is more important than ever before that we protect the finite and non-renewable resource that is our agricultural soil. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 860,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP<sup>1</sup>. In order to preserve the viability of Ontario's agri-food sector, it is crucial that the province's finite supply of agricultural land is protected.

In the past, OFT has commended the Province's commitment to the policies that strengthen agriculture in Ontario. We recognize the need to address issues of housing availability and affordability, however, OFT would like to encourage the Province to continue showing a strong commitment to Ontario's agri-food sector by making policy decisions that protect agricultural systems, agricultural land and food security and support the continued production of local food.

**The housing crisis facing Ontario is a real and wide-spread problem, however, OFT is concerned that the provincial policy changes in Bill 23 will not provide an effective solution. If this crisis is not addressed effectively, it will only exacerbate the other challenges Ontarians have to face, such as rising food insecurity, rising land prices, and the destruction of the agricultural system in Ontario.**

**OFT does not support the integration of the Provincial Policy Statement (PPS) and the Growth Plan.**

The Greater Golden Horseshoe (GGH) has some of the best farmland in Ontario. There are over 200 commodities grown in the GGH, many of which can not be grown elsewhere in the province. The GGH is a unique growing area due to the microclimates created by the Oak Ridges Moraine, the Niagara Escarpment, and the moderating influence of Lake Ontario. The soil in the region is predominantly Class 1, the best agricultural land available and part of a very limited and non-renewable resource. Less than 0.5% of the land in Canada is Class 1 land and over 50% of the land in Central Ontario qualifies as prime



agricultural land<sup>2</sup>. Unfortunately, the GGH is also facing some of the highest development pressures in Canada<sup>3</sup>. This puts the GGH in a unique position wherein a balance needs to be struck between development and agriculture. While many other municipalities around the province are also trying to find this balance, few others must contend with the development pressures facing the GGH. As such, it is important that the GGH has land use planning policy that is specific to the GGH. This will not only ensure that the needs of the people and the agricultural sector in the GGH are met, protect our future ability to produce a wide range of locally grown foods but also ensure that municipalities outside of the GGH are not held to land use planning policy that is not relevant to them.

**OFT has the following recommendations for the review of A Place to Grow and the Provincial Policy Statement:**

- 1) **That the PPS and A Place to Grow are not integrated.** Combining these two plans does not account for the unique circumstances that the GGH is subjected to, and will not serve the urban population or the farmers of the area in the long run.
- 2) **Streamlining settlement area boundary expansions and employment area conversions puts farmland at an unnecessary risk and does not adequately address the housing crisis. Instead of expansion, efforts should be focused on intensification and inclusionary zoning.** The streamlined approach to expansion and development proposed puts farmland at risk. Ontario's farmland supports a significant economic sector, and it should receive protections that reflect its importance. As the recent report by the Ontario Housing Affordability Task Force<sup>3</sup> states, "a shortage of land isn't the problem" (p.10), but rather that the land we have already slated for development is zoned exclusively for single-family, detached homes. This type of development does not provide an attainable, let alone affordable or equitable, solution to the housing crisis, and should be replaced by higher-density development.
- 3) **Additional, explicit, policy direction is needed for the implementation of an increase in rural housing supply.** While an increase in rural housing may actually be beneficial for farm workers seeking housing, special consideration needs to be given to the impacts that an increasing rural population may have on agriculture. Pre-existing agricultural activities should not be impeded by development. Regulations to mitigate and prevent conflicts need to be in place *before* changes to policies that permit more development in rural areas occur.
- 4) **Streamlining the process for aggregate extraction "close to where they are needed" focuses aggregate extraction around the province's best farmland.** Development pressures are highest around the GGH, surrounded by some of Ontario's most fertile farmland<sup>3</sup>. Ensuring access to aggregates "where they are needed" will result in the GGH being subject to aggregate extraction to facilitate the large amount of development there, and puts this farmland at even more risk. Attempts to ensure the rehabilitation of lands that have been subject to aggregate extraction for agricultural use have been ineffective. Aggregate operations are common throughout Ontario, which calls into question the need for streamlined approval processes for these operations. The simplified and streamlined policy direction for aggregate extraction will put farmland at an immense risk, and should not be permitted.



In their 2022 report, the Ontario Housing Affordability Task Force<sup>4</sup> states that “relying too heavily on undeveloped land would whittle away too much of the already small share of land devoted to agriculture.” (p. 10). OFT believes that the integration of the PPS and A Place to Grow will only exacerbate the development pressure on farmland by streamlining non-agricultural development on farmland, and as such, that this integration should not move forward.

**Ontario needs an increased housing supply, but what is proposed in Bill 23 is not an effective solution.** Ontarians need affordable, high-density housing solutions that provide residents with easy, walkable, access to public transit and amenities<sup>5</sup>. New development built upon annexed farmland and natural areas are not an equitable solution to the housing crisis, and will only serve to magnify both the climate crisis and food insecurity.

Thank you for this opportunity to share our recommendations and feedback on **ERO 019-6177**. We sincerely hope you take our suggestions into consideration when reviewing the feedback you receive. If you have any questions or would like to speak further on these issues, please do not hesitate to get in touch. We look forward to continuing to work with the Province to strengthen the agricultural system and protect the viability of the agricultural sector.

Most Sincerely,

Martin Straathof  
Executive Director  
Ontario Farmland Trust

Bernard Pope  
Chair, Board of Directors  
Ontario Farmland Trust

Margaret Walton  
Chair, Policy and Education Committee  
Ontario Farmland Trust



References:

- [1] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] The Neptis Foundation. (2021). Where are significant agricultural lands located? <https://neptis.org/publications/chapters/where-are-significant-agricultural-lands-located>
- [3] Ontario Federation of Agriculture & Environmental Defence. (2015). Farmland at risk: Why land-use planning needs improvements for a healthy agricultural future in the Greater Golden Horseshoe. <https://environmentaldefence.ca/report/report-farmland-at-risk/>
- [4] *Ontario Housing Affordability Task Force*. (2022). Report of the Ontario Housing Affordability Task Force. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>
- [5] Jacobus, R. (2019). Inclusionary housing: Creating and maintaining equitable communities. *Lincoln Institute of Land Policy*. <https://www.jstor.org/stable/pdf/resrep22075.pdf>