



May 25, 2023

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

RE: Agricultural Lot Severances, ERO #019-6813 for review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument

Dear Minister Clark,

I am writing on behalf of the Ontario Farmland Trust (OFT) to express our concerns regarding the proposed changes found in the proposed Provincial Policy Statement, 2023 (PPS 2023). Specifically, OFT is concerned about the impact the proposed policies will have on agricultural lands in the province.

Ontario's prime agricultural land is a finite, non-renewable resource that comprises less than 5% of Ontario's land base¹. With the growing rate of farmland loss in the province, currently at a rate of 319 acres per day², it is more important than ever before that the province protects our prime agricultural areas. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 750,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP³.

While OFT recognizes the need to address issues of housing availability and affordability, OFT is concerned that several of the policies in the proposed PPS 2023 will not adequately contribute to the housing issues and instead will create significant issues for the long-term viability of Ontario's agri-food sector. This submission will focus primarily on the proposed PPS 2023, section 4.3.3 Lot Creation and Lot Adjustments. However, OFT has a breadth of concerns regarding several of the proposed policies and Ontario's agricultural land that are addressed in other submissions.

Comments regarding section 4.3.3 Lot Creation and Lot Adjustments

OFT is concerned about proposed s.4.3.3 which permits the severance of three residential lots from parcels in prime agricultural areas. This poses a significant threat to the long-term viability of the agricultural sector. As it currently reads, this policy could apply to any parcel of agricultural land, regardless of its size or whether it was previously severed before January 2023. Given that there are 48,346 farms⁴ and as many as 170,000 farmland properties in Ontario⁵, the province could see anywhere from 145,038 to 510,000 lots severed from agricultural properties. **Therefore, if each lot is approximately 1-acre in size, this policy alone would be responsible for removing anywhere from 1.25% to 4.3% of Ontario's finite agricultural land base.**

The use of a provincial agricultural systems approach to planning is crucial to protect agricultural land, given its importance as an economic driver and in recognition of the natural heritage and hydrological features and functions that farmland plays⁶. While OFT appreciates that proposed s.4.3.1 states "Planning authorities are encouraged to use an agricultural system approach," this policy does not provide the



strength needed to require agricultural systems, and appears to be in contradiction to the permissions of s.4.3.3. When you factor in s.4.3.2.5, which permits up to two additional dwellings in prime agricultural areas, this could result in as many as 1.5 million dwellings on newly severed lots in agricultural areas.

This will lead to significant farmland fragmentation, which is contradictory to the purpose of an agricultural system, and will cause significant disruptions to surrounding agricultural operations.

Moving to rural areas often means embracing the realities of agricultural living, such as noise, dust, odors, and farm equipment on the roads. Unfortunately, this leads to land-use compatibility conflicts that are difficult to mitigate once residential units are developed in agricultural areas. This poses significant challenges for farmers, especially when Minimum Distance Separation (MDS) is not properly followed during development approvals. **This is concerning given that Bill 23 prevents third-party appeals at the Ontario Land Tribunal, making it difficult for nearby farmers to address MDS concerns. Additionally, constructing residential units up to the MDS line will limit any future growth of the agricultural operation, threatening the future viability of animal agriculture in Ontario.**

Furthermore, additional residential units on prime agricultural areas will result in an increase in water usage from underground aquifers. Three additional lots, including three additional residential units would put a significant strain on the water usage and increase the likelihood of water source issues for both the residents and the agricultural operation. Agriculture uses significant amounts of water to irrigate crops and provide water to livestock. Although a large percentage of water is returned to the source, often it has been changed and carrying soil and dissolved compounds⁷. With less water available in the aquifer, any contaminants will be more concentrated. **Therefore, permitting three lot severances in prime agricultural areas will have significant implications for water availability and safety.**

By permitting lot severances, the province will be impacting the financial accessibility of farmland for the next generation of farmers, making farming less financially viable. Each farm property will likely increase in price relative to the value of three vacant lots in the respective region. Ontario experienced a 19.4% increase in property values in 2022⁸, making it unattainable or financially unfeasible for many young farmers to buy land. The proposed severance policies will incentivize developers, who can outbid young farmers, to purchase farmland or provide cash incentives for farmers to sever lots, contributing to the increase in farmland prices. This will result in the next generation experiencing a fragmented agricultural system and keeping ownership of farmland out of their reach. **This is concerning because if the next generation of farmers cannot afford to farm, and experience it as increasingly difficult to farm, the province will not have a viable agricultural sector for much longer.**

We have noticed that the new proposed PPS 2023 states in policy 4.3.1.2, "As part of the agricultural land base, prime agricultural areas, including specialty crop areas, shall be designated and protected for long-term use for agriculture." **However, permitting lot severances for residential use contradicts lands being designated for the long-term protection for agriculture.**

We believe that the proposed s. 4.3.2.5, which would allow two additional units on existing farm properties, could be significant in providing housing opportunities for new and young farmers during succession planning and transitioning the farm to new operators. Similarly, the proposed s. 2.2.1.b.2 allows more land for housing by converting existing commercial and institutional buildings for residential use. Given these other proposed policies permitting additional housing and the significant concerns over



the proposed lot creation policies, OFT questions why there is a need to permit such a significant allowance for severances.

Furthermore, permitting these severances is in contradiction to proposed s. 2.2.1.c, "promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation." S.4.3.3 will not promote efficiency in these areas and will detract from the intentions to support intensification.

We believe that municipalities should be permitted to allow for additional restrictions to help protect agriculture and mitigate the likelihood of conflict arising between non-farming residents and the agricultural community. However, proposed s.4.3.3.2 prevents municipalities from being more restrictive, which could be vital for preventing these types of conflicts. **For rural communities whose economies and culture are intricately associated with agriculture, s.4.3.3.2 will prevent municipalities from protecting a key component of their communities** and is contradictory to the content on page 3 that states the PPS 2023 recognizes the diversity of Ontario and that local context is important. **S.4.3.3.2 restricts rural municipalities from ensuring the local context of their agricultural system is protected from farmland fragmentation.**

We, therefore, urge the province to consider these concerns and **remove s.4.3.3 in its entirety so that the proposed changes do not harm the province's agricultural lands and the farmers who depend on them.** The province should require municipalities to use the provincial agricultural system mapping and allow municipalities to implement additional restrictions to help protect agriculture and prevent conflicts with non-farming residents.

Thank you for considering our submission, and our organization looks forward to the province's response. OFT hopes you also refer to our other submissions regarding settlement area expansion and agricultural system planning.

Sincerely,

Martin Straathof, Executive Director
Ontario Farmland Trust

Cc: Bernard Pope, Chair of the Board of Directors, Ontario Farmland Trust
Hon. Lisa Thompson, Minister of Agriculture, Food & Rural Affairs
Rob Flack, Parliamentary Assistant to Minister of Agriculture, Food & Rural Affairs
Trevor Jones, Parliamentary Assistant to Minister of Agriculture, Food & Rural Affairs
Kevin Holland, Parliamentary Assistant to the Minister of Municipal Affairs and Housing
Michael Parsa, Associate Minister Municipal Affairs and Housing



References:

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- [2] Statistics Canada. 2021. Census of Agriculture. Retrieved from <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3210015301&pickMembers%5B0%5D=1.7&cubeTimeFrame.startYear=2001&cubeTimeFrame.endYear=2021&referencePeriods=20010101%2C20210101>
- [3] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. Retrieved from <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
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- [5] Agricorp. 2022. 2021-22 Annual Report. Retrieved from <https://www.agricorp.com/SiteCollectionDocuments/Agricorp-AnnualReport-2022-en.pdf>
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