

May 14, 2026

Planning and Housing Policy Branch; Provincial Planning Branch
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay Street
Toronto, ON. M7A 2J3

Submitted online and to PlanningConsultation@ontario.ca

To the Planning Consultation Team,

Re: ERO # 026-0300, Proposed Planning Act, City of Toronto Act, 2006, Building Code Act, 1992 and Municipal Act, 2001 Changes (Schedules 1, 2 and 7 of Bill 98, the Building Homes and Improving Transportation Infrastructure Act, 2026); ERO # 026-0315, Consultation on upper-tier official plans, secondary plans, and site and area-specific policies; and ERO # 026-0311: Proposed Regulatory Approach to Establish a Minimum Residential Lot Size in Urban Areas

On behalf of the Ontario Federation of Agriculture (OFA), thank you for the opportunity to continue participating in the consultation process through EROs # 026-0300, 026-0315, and 026-0311 by providing input on the proposal to streamline and standardize planning in Ontario. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA is dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with on issues, legislation and regulations that would impact the sustainability and growth of our farm businesses.

OFA's Feedback in Summary

- OFA recommends using the *Provincial Planning Statement* (PPS, 2024) as the central policy instrument that defines planning terms and prefers that the PPS definitions be used as the basis for standardization;
- OFA cautions that adding new planning terms (e.g. *neighbourhoods*) and alternative definitions (e.g. *prime agricultural areas*) through regulations and policies outside the PPS will add to the complexity of Ontario's planning system and may result in competing legal interpretations;
- OFA supports policies that direct municipalities to absorb growth into the existing urban built-up area through intensification, densification, and incremental growth; *mixed-use areas* and small or non-existent minimum lot sizes in built-up urban areas may contribute towards intensifying Ontario's existing *settlement areas*;
- The proposal to remove notice from *minister's zoning order decisions* is not supported;
- OFA recommends that upper-tier municipalities without planning responsibilities have their planning responsibilities re-instated.

Introduction

OFA supports the intensification of Ontario's urban settlement and built-up areas as a means of limiting farmland loss. The prosperity of Ontario's agricultural system relies on policies that redirect non-agricultural uses and developments into appropriate areas, away from the countryside. OFA is supportive of planning tools like the *Agricultural Impact Assessment (AIA) Guidance Document* that advance this goal. Municipalities should be encouraged to use planning tools that protect farmland and maximize urban efficiency. OFA remains deeply troubled by farmland loss trends and hopes that by changing the planning system to prefer intensification and efficient urban spaces that countryside spaces and non-renewable soil resources are protected.

Standardizing and Streamlining Municipal Plans

OFA's membership has voiced concern that planning requirements can differ between municipalities which in turn may impede farm business development. Farms often make use of multiple properties which can be spread out between townships or even counties. OFA therefore supports the general intent behind standardizing planning documents. However, there may be circumstances where local policies must be tailored to suit a unique need, which should be justified to the MMAH or upper-tier planning authorities during official plan approval.

OFA observes that EROs # 026-0300 and 026-0315 propose a number of new planning terms. Historically, provincial planning definitions tend to be introduced through the *Provincial Planning Statement* (PPS, 2024). For example, the proposal includes *neighbourhoods* and *community areas* as new planning terms to be introduced separately from the PPS.

These consultations also discuss other terms that have been previously defined, such as *prime agricultural areas* and *specialty crop areas*, but the definitions in consultation proposals differ from those in the PPS. Municipalities are instructed by the *Planning Act* to make planning decisions and designations consistent with the PPS. Introducing new and alternative definitions through regulations and other planning instruments may result in competing legal interpretations and possibly appeals to the Ontario Land Tribunal. Instead, OFA recommends using definitions in the PPS as the central policy instrument for harmonizing planning terminology across the province.

Minimum Lot Sizes, Intensification, and Denser Urban Areas

Mixed-use areas can be an effective tool for encouraging intensification. Mixed-use zoning and other policies encourage developments to stack, building upwards rather than outwards. OFA notes that ERO # 025-1100 stated the Ministry is aware of policies that enable high-density developments in other countries, and we are encouraged by the forward momentum that EROs # 026-0300, 026-0315, and 026-0311 add to the discussion.

Among the proposed planning changes is eliminating or reducing minimum lot sizes, road frontage, and lot depth within urban *settlement areas* outside of the *Greenbelt Area*. In combination with *mixed-use areas*, this urban policy structure has the real potential facilitate denser and more efficient urban spaces. OFA takes this opportunity to repeat our position that

existing urban boundaries should be prohibited from expanding, which would contribute to the success of municipal intensification and support policies that mitigate farmland redevelopment pressures.

OFA encourages the province to include mechanisms in urban land use definitions, potentially including *neighbourhoods* and *mixed-use areas*, that enable incremental growth. Many existing built-up areas could be leveraged for their potential to absorb growth but can only do so through tools like *additional residential units* and other forms of intensification. By enabling urban spaces to absorb growth, outward expansion into the countryside can be limited while maximizing public investments already made into infrastructure. The province should consult with municipalities regarding what low-density residential areas can be designated for incremental growth into *mixed-use areas*, and what corresponding targets should be required.

Minister's Zoning Orders

OFA does not support changes to the *Planning Act* that would remove the requirement for notice of proposed *minister's zoning order* (MZO) actions. OFA recommends that *minister's zoning orders* (MZOs) be subject to agricultural impact assessments, and further recommends that MZOs not be used to enable the conversion of farmland into non-agricultural uses.

Upper-Tier Planning Responsibilities

OFA supports upper-tier municipal planning as a practice that protects Ontario's contiguous and interconnected agricultural systems, including the agricultural land base and the agri-food network. Agricultural systems do not stop at municipal boundary lines, and upper-tier planning is an effective tool for regional coordination. Creating a division between upper-tier municipalities with and without planning authority adds to the already complex planning system seen in Ontario, as it necessitates collaboration between many lower-tier municipalities rather than relying on the established and consistent framework of a regional or county planning authority.

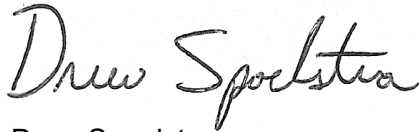
OFA recommends that planning responsibilities be restored to those upper-tier municipalities that have seen them revoked unless an assessment can demonstrate whether such revocations have resulted in desirable outcomes.

Closing Remarks

OFA is appreciative the Ministry has worked to enable urban intensification and standardize planning. Both initiatives may benefit Ontario farmers. However, our organization is concerned about adding layers to Ontario's already complex planning system, such as new planning tools that include new and alternative definitions from those in the PPS. OFA is also concerned about the ramifications of ceasing the practice of providing notice for MZOs and revoking planning responsibilities from upper-tier municipalities. Our organization remains deeply troubled by farmland loss; OFA hopes that urban intensification and denser built-up areas will help to mitigate unsustainable farmland loss trends.

OFA thanks the Ministry for this opportunity to provide our feedback and perspectives on how the province is reshaping the planning system. We look forward to working with the provincial government and our municipal counterparts to find policy solutions that support the agri-food sector and protect Ontario's agricultural system.

Sincerely,



Drew Spoelstra
President

cc: Hon. Rob Flack, Minister of Municipal Affairs and Housing;
Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness;
Hon. Lisa M. Thompson, Minister of Rural Affairs;
OFA Board of Directors.

This submission has been approved by OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources>.