



August 2, 2023

Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
17<sup>th</sup> Floor, 777 Bay Street  
Toronto, ON M7A 2J3

Dear Minister Clark,

**Re: *ERO 019-6813 Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning instrument***

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Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-6813 Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning instrument*. BFO represents the 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

A key priority for BFO and our members is the preservation of Ontario's agricultural land base. We strongly believe the best way to protect Ontario's agricultural lands is through sound provincial land use policy that sees agricultural lands, including marginal lands used for livestock grazing and carbon sequestration, protected as the highest and best use of Ontario's arable land.

Ontario's beef sector contributes \$2.69 billion to Ontario's GDP on an annual basis and sustains more than 61,000 jobs through primary production, processing and retail. Ontario's beef farmers also provide important ecological goods and services, especially through the management of grasslands, that protect and enhance Ontario's environment. This includes sequestering carbon in the soil, providing habitat for wildlife and species at risk, oxygen production, water and nutrient cycling, and maintaining and improving soil health. The ability to provide these ecological goods and services on lands managed with cattle is threatened by competing land uses.

We thank the government for taking the time to meet with BFO and our industry partners to discuss our concerns regarding proposed changes outlined in the PPS. BFO is very pleased with the government's commitment to continue engaging with the agriculture sector regarding alternatives for supporting multi-generational farm families without the use of additional severances in prime agricultural areas.

The provincial government's plan to address Ontario's housing crisis is ambitious and necessary, and we continue to support the province's efforts to address this issue. We also strongly believe achieving the government's housing goals must be balanced with the need to protect our agricultural land base and we remain concerned with aspects of the proposed PPS as it relates to this point.

Our comments to the discussion questions below will focus on the proposed changes that relate to or impact agricultural lands and beef farmers.

**1) What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?**

We acknowledge and strongly support the following statement as outlined in the proposed PPS Vision statement: *Housing must be built in the right places so that Ontario's vibrant agricultural sector and sensitive areas will continue to form part of the Province's economic prosperity and overall identity. Growth and development will be focused within urban and rural settlements that will, in turn, support and protect the long-term viability of rural areas, local food production and the agri-food network.* This component of the proposed PPS Vision statement recognizes that a balanced approach to land use planning is critical, and building more housing and maintaining our agricultural lands go hand in hand.

In addition, with the release of the Grow Ontario agri-food strategy, we recognize this strategy as the gameplan to address future food production challenges with targeted investments to drive growth and support Ontario's agri-food sector. The Grow Ontario strategy includes a significant goal to increase the consumption and production of food grown and prepared in Ontario by 30 percent by 2032. When examining a number of the changes within the proposed PPS it must be noted that achieving the above goal will be significantly challenged by the further loss of agricultural lands, increased conflicts between non-farm neighbours and farmers performing normal farm practices, and the increasing price of farmland. Further, the proposed PPS will impact not only Ontario's farmers, but also the general public, as Ontario's farmland is gradually paved over, we weaken our ability to produce food locally and, ultimately, negatively affect our food security.

We believe the proposed PPS should be the minimum standard for agricultural land protection in Ontario and allow for municipalities to expand upon agricultural land protections where they see fit.

Minimum Distance Separation

BFO is pleased to see the Minimum Distance Separation (MDS) formula will be maintained in the proposed PPS. MDS serves as an important tool to prevent land use conflicts and to minimize nuisance complaints related to normal farming practices between farming operations and surrounding residential land uses. By ensuring a minimum distance between livestock operations and residential land uses, MDS is also a critical tool to prevent potential water quality issues and biosecurity concerns. For these reasons, we firmly believe MDS needs to be maintained in Ontario.

That said, we have outlined concerns below in regards to section 2.3.4 Settlement Area and Settlement Area Boundary Expansions, which does not recognize the importance and value of the MDS policy.

Lot Creation and Lot Adjustments

Again, we are very pleased with the government's commitment to further engage with the agriculture sector regarding alternatives for supporting multi-generational farm families without the use of additional severances in prime agricultural areas.

Allowing lot creations in prime agricultural areas would be a fundamental shift from the current Provincial Policy Statement and would create a multitude of unintended policy consequences. Some of these unintended consequences include the constraining of livestock farmers' ability to establish new operations and/or grow their operations (barns, manure storage, etc.); would drive a reduction in investment into the livestock sector, which will create stagnation in the sector resulting in fewer and fewer farmers, negatively affecting the backbone of our rural communities; exacerbate the already unsustainable loss of Ontario's agricultural lands; risk inflating farmland prices; increase

infrastructure service demands on municipalities; create water quantity and quality concerns as a result of increased residences in agricultural areas; create increased fragmentation of our agricultural land base; and lead to more farmland being purchased for investment and speculative purposes, making farming even more unattainable for the next generation.

We firmly believe the current restrictions on lot severances in prime agricultural areas, as outlined in the Provincial Policy Statement, should be maintained. We do not support policies that will increase residential lot creation in agricultural areas.

### Permitted Uses

Section 4.3.2 would allow up to two additional residential units (ARU), in addition to the principal dwelling, in prime agricultural areas provided that any additional residential units are within, attached to, or in close proximity to the principal dwelling; complies with the minimum distance separation formulae; is compatible with, and would not hinder, surrounding agricultural operations; and appropriate sewage and water services will be provided.

We support this change and believe it will provide farm families with the opportunity to add residential units to their property for family members or farm workers. However, we believe much more clarity is needed within in this section. We recommend the inclusion of specifics for type, size, scale, and location of proposed ARUs. Furthermore, in section 4.3.2.4, it states that a principal dwelling associated with an agricultural operation may be permitted in prime agricultural areas as an agricultural use, in accordance with provincial guidance. We recommend provincial guidance material also be provided for ARUs in prime agricultural areas to ensure the creation of ARUs on prime agricultural land is applied consistently across the province. We are also concerned with the proposed change in section 4.3.2.5 that would allow for severing of ARUs in prime agricultural areas. As stated, we do not support policies that will increase residential lot creation in agricultural areas.

We recommend a government and industry working group be established to develop the needed clarity and criteria for ARUs in prime agricultural areas to ensure they are practical, consistent, and compatible with existing agricultural operations.

### Settlement Areas and Settlement Boundary Expansion

Section 2.3.1 states “[s]ettlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas”. BFO supports this section and we firmly believe that in order to balance our province’s need to build more housing while preserving our agricultural lands for future generations, the province must be focused on creating complete communities and densifying existing urban and rural settlement areas where municipal services are present.

BFO is very concerned with section 2.3.4, which states:

*In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities should consider the following:*

- a. that there is sufficient capacity in existing or planned infrastructure and public service facilities;*
- b. the applicable lands do not comprise specialty crop areas;*
- c. the new or expanded settlement area complies with the minimum distance separation formulae;*
- d. impacts on agricultural lands and operations which are adjacent or close to the settlement area are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible*

- as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and*
- e. the new or expanded settlement area provides for the phased progression of urban development.*

BFO supports fixed permanent urban boundaries to limit the loss of agricultural lands and focusing growth within existing urban boundaries. We believe higher density development should be mandated province-wide to take advantage of existing infrastructure and to protect agricultural land.

The change in language to provide municipalities with a simplified and flexible approach to expand settlement boundaries by removing the need for a comprehensive review and stating municipalities “should consider” things like compliance with MDS or ensuring impacts to agricultural lands are avoided or minimized through an Agricultural Impact Assessment, we view as short-sighted. We believe this will lead to inconsistent implementation across municipalities leading to further loss of agricultural lands and varying levels of protection for agricultural lands across municipalities.

We recommend the proposed PPS maintain the requirement for planning authorities to demonstrate whether creating a new settlement area or expanding an urban boundary will impact agricultural lands and farm operations, complies with MDS, and whether there are reasonable housing alternatives within existing urban boundaries.

In addition, the proposed change in 2.3.4 fails to recognize the importance of the MDS policy, and, for the reasons outlined above, the MDS policy cannot simply be taken as a light suggestion for new settlement areas or boundary expansions. In addition, we strongly believe Agricultural Impact Assessments (AIA) must be completed when examining a new settlement area or settlement area boundary expansion.

Building housing on agricultural lands should be a last resort and only after development of underused or vacant areas within existing urbanized areas has been completed.

#### General Policies for Agriculture

The proposed PPS outlines the following general policies for agriculture in section 4.3.1:

- 1. Planning authorities are encouraged to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.*

We believe the agricultural system approach, which is supported by Agricultural Impact Assessments, provincial Agricultural Land Base Mapping and Agricultural System Portal, is a valuable planning tool that looks at the entire agriculture network and we have supported the use of the agricultural system approach as it has been implemented within the Greater Golden Horseshoe (GGH), and we have previously requested and continue to request the use of this approach be required by municipalities throughout Ontario.

The proposal to eliminate the requirement to use the provincially-mapped Agricultural System, and require municipalities to designate specialty crop areas and prime agricultural areas is a concern. We believe this will create a patchwork of agricultural land mapping and remove a tool that allows for ‘big picture’ agriculture land use planning. We recommend maintaining the use of the provincially mapped agricultural system to reduce agricultural land fragmentation and to protect farmland.

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.*

BFO supports this provision continuing to be included in the province's land use planning policy, but, as our comments highlight, other policy changes in the proposed PPS do not support the above provision and will not protect prime agricultural areas.

3. *Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory Class 1, 2, and 3 lands, and any associated Class 4 through 7 lands within the prime agricultural area, in this order of priority.*

The continued prioritization of agricultural soils within prime agricultural areas is concerning for the beef sector. Agricultural soil types serve different purposes and have various capabilities, but are all important for maintaining a healthy and vibrant agricultural sector. We have long advocated that soil types classified as 4 through 6 be equally protected and included in the definition of Prime Agricultural Lands. Class 4-6 soils are suitable for grazing livestock on pasture and hay production, and for providing ecological goods and services, such as sequestering carbon in the soil and providing habitat for wildlife.

#### Rural Housing and Lands

It is very important to remember that not all agricultural land in Ontario is zoned as prime agricultural land, and there are many farms and agricultural lands that municipalities have zoned as rural land. We cannot forget about these farms and their value when discussing the preservation of agricultural lands.

Land use planning in Ontario must balance opportunities for growth and building housing with the need to preserve our agricultural lands. Focusing growth on urban and rural settlement areas will help balance this need while supporting local economies, reducing farmland loss and reducing potential land use conflicts. We know rural communities also need more housing, and there are opportunities within existing rural hamlets and towns to increase density and where adequate servicing exists or can be expanded upon to more efficiently expand the rural tax base for municipalities. Density and intensification targets should be analyzed and applied to rural settlements and settlement areas.

The proposed change to add multi-lot residential development as a permitted use on rural lands within section 2.6.1 is extremely concerning and we believe unrestricted growth in rural areas will have negative consequences, especially for agricultural lands. This includes removing productive farmland and natural heritage features, increasing conflict between non-farming residents and farming operations, increasing demand for services in less dense areas, and the overall character of rural landscapes. BFO does not support this proposed change.

The current 2020 Provincial Planning Statement in section 1.1.5.2 allows residential development, including lot creation, that is locally appropriate, as a permitted use on rural lands. Lot creation on rural lands is already a controversial topic and has meant agricultural land zoned as rural land has been severed for residential development or purchased for the purpose of removing the land from agricultural production altogether. We strongly believe the government should examine setting a maximum size for lot creation on rural lands to ensure large pieces of productive agricultural land is not removed from production.

BFO recommends agricultural uses, agricultural-related uses, on-farm diversified uses and normal farm practices should be protected and given higher priority as permitted uses within section 2.6.

### Natural Heritage

We would like to indicate our support for section 4.1.9 that states nothing in section 4.1 is intended to limit the ability of agricultural uses. We encourage the government to strengthen section 4.1.9 by stating that, in addition to “agricultural uses”, nothing in section 4.1 is intended to limit “normal farm practices”, as it is defined within the proposed PPS.

### **2) What are your thoughts on the proposed policies regarding conservation of agriculture, aggregates, natural and cultural heritage?**

Under Ontario’s current provincial land use planning policies and plans, the province is currently losing agricultural land at an unsustainable rate. Agriculture Census data from 2016 to 2021 shows Ontario lost 582,392 acres of farmland, totaling over 1.5 million acres of farmland lost between 2006 to 2021. Further, between 2016-2021, over 290,000 acres of tame and native grasslands were lost in Ontario. BFO has long advocated for improvements in land use planning policies to better protect agricultural lands in Ontario.

Statements within the proposed PPS policies to focus growth within urban and rural settlement areas and maintaining MDS are important to conserve agricultural land. Now, as our above comments highlight, we have serious concerns that a number of proposed changes will do very little to conserve agricultural lands or support agricultural operations for the long-term. In fact, a number of the proposed changes, as they relate to agricultural lands, would be harmful to the future of livestock agriculture in Ontario and would fundamentally weaken Ontario’s agriculture sector and its ability to produce local food.

Section 2.9 Energy Conservation, Air Quality and Climate Change states that municipalities must plan to reduce greenhouse gas emissions (GHG) and prepare for the impacts of a changing climate. As noted above, agricultural lands, especially hay and pasture lands, do not simply serve as land to produce food, but provide ecological goods and services through sequestering carbon in the soil, mitigating floods, supporting biodiversity and wildlife, and other extremely important natural climate solutions that will help to reduce the impacts of climate change. Policies that will directly or indirectly reduce our agricultural land base not only negatively impact our food security, but increase GHG emissions and remove a tool we have to mitigate the effects of climate change.

We look forward to on-going dialogue with the government to help meet Ontario’s housing goals while preserving our agricultural land and achieving the Grow Ontario agri-food strategy goals.

Sincerely,



Jack Chaffe  
BFO President

Cc: Hon. Lisa Thompson, Minister of Agriculture, Food and Rural Affairs  
Hon. Nina Tangri, Associate Minister of Housing

Mr. Rob Flack, Parliamentary Assistant (OMAFRA)  
Mr. Trevor Jones, Parliamentary Assistant (OMAFRA)  
Mr. Matthew Rae, Parliamentary Assistant (MMAH)