



December 30, 2022

Provincial Land Use Plans Branch
Ministry of Municipal Affairs and Housing
13th Floor, 777 Bay St
Toronto, ON M7A 2J3
growthplanning@ontario.ca

To whom it may concern,

Re: ERO 019-6177 Review of A Place to Grow and Provincial Policy Statement

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on the Ministry of Municipal Affairs and Housing's (MMAH) *ERO 019-6177 Review of A Place to Grow and Provincial Policy Statement*. BFO represents 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.

The province's proposal to integrate the Provincial Policy Statement (PPS) and A Place to Grow (APTG) into a new province-wide planning policy instrument with the intended outcome of creating an approach that would enable municipalities to accelerate the development of housing and increase Ontario's housing supply raises significant concerns for BFO and our members. Many of our concerns come from the lack of details provided through this consultation on what changes may come from integrating both planning policies and the lack of clarity on what protections for agricultural lands and other beneficial policies to agriculture and rural communities may be changed or removed through this process.

We recognize the provincial government's plan to address Ontario's housing crisis and prepare for the province's expected population growth over the next ten years by building approximately 1.5 million homes is ambitious and necessary, but advancing housing development throughout Ontario cannot be done at the expense of our province's finite agricultural lands. BFO continues to advocate for the province to take seriously the continued loss of Ontario's agricultural lands to development or other non-agricultural uses, and to do more to balance our province's need for increasing Ontario's housing supply with the need to better protect our farmland and ability to produce food.

Farmland in Ontario continues to be lost to urbanization or non-agriculture uses at an alarming rate. The most recent Agriculture Census data for 2016 to 2021 shows Ontario lost 582,392 acres of farmland. This adds up to over 1.5 million acres of farmland lost to development or non-agriculture uses between 2006 to 2021. Further, between 2016-2021, over 290,000 acres of tame and native grasslands were removed from the Ontario landscape.

These are unsustainable losses, particularly when viewed in the context of the economic contributions of Ontario's agri-food sector and the anticipated population growth in Ontario and globally. The current levels of agricultural production, economic activity and employment cannot be maintained if the land base they depend on continues to be lost to non-agricultural uses.

Agriculture is the backbone of our rural communities and is important to the quality of life of all Ontarians. Beef farms and the broader beef cattle sector have a presence and economic impact in every county and district in Ontario, sustaining more than 61,000 jobs in primary production, processing and retail across the province. Combining the revenue from primary production, processing and retail, the beef industry contributes \$2.69 billion to Ontario's GDP on an annual basis, and gross sales exceed \$13 billion.

Further loss of the land that our industry depends on for grazing cattle and growing forages will also have serious environmental consequences. Grasslands are widely recognized by government, industry and environmental groups as a highly valuable ecosystem and environmental feature, and the majority of Ontario's grasslands are managed by livestock farmers. Beef farmers' businesses are dependent on healthy forages and pastures, and they are invested in protecting them. Land use policy has a significant influence on competing interests for Ontario's farmland, which is one of Ontario's most valuable and at-risk resources. The potential environmental consequences of losing even more agricultural grasslands in the province to competing land uses include loss of organic matter and perennial crops that store carbon, loss of wildlife habitat, release of carbon stores from land use conversion, degradation of soil health, and increased risk of nutrient run-off in our water sources

We have outlined our concerns and recommendations below regarding the integration of the PPS and APTG:

Agricultural System Approach and Mapping

BFO is a strong advocate for the agricultural systems approach, as it conceivably looks at the entire network of agriculture, beyond CLI class designation, and we support strongly the continued use of the agricultural system approach as it's been implemented within the Greater Golden Horseshoe (GGH). We recommend the agricultural system approach be required by planning authorities throughout the province, as Ontario's entire agricultural land base and network deserve policies that encourage and support economically viable agricultural uses over non-agricultural uses.

Land use plans within the GGH region have implemented an agricultural system approach through the APTG, supported by key tools including Agricultural Impact Assessments (AIAs), provincial Agricultural Land Base Mapping and an Agricultural System Portal. This agricultural system approach recognizes that agriculture requires both a land base and key surrounding infrastructure to thrive and works to support the entire system in land use planning.

We also strongly believe that land used for agriculture but not classified as prime agricultural land, or CLI Class 1-3 soils, must also be preserved to ensure future capacity for the production of food exists throughout the province and across commodity sectors. This is particularly important for agricultural uses that do not depend on CLI Class 1-3 soils, such as beef production, as such land is actually ideal for pasture and forages. There are currently a number of municipalities and/or regions in Ontario that do not have any Class 1-3 soil, and therefore do not have any prime agricultural land, which leaves all their farmland with the more limited protection that comes with a rural land designation.

Agricultural Impact Assessments

BFO supports the use of AIAs as a key tool for land use planning and for providing an opportunity for avoiding, minimizing and/or mitigating negative impacts on agriculture. We recommend AIAs continue to be a tool that is used and that AIAs be required as part of the permit process for residential builds on Ontario's diminishing agriculturally productive land throughout Ontario.

Residential Lot Creation in Agricultural Areas

BFO recommends maintaining the existing restrictions on lot severances in prime agricultural areas in the new planning policy instrument, as is outlined within the Provincial Policy Statement. The creation of residential lots in prime agricultural areas should not be permitted unless it's a surplus dwelling residence as a result of farm consolidation. Residential lot creation in agricultural areas continues to be controversial and the impacts are well known, including fragmentation of the agricultural land base, increased conflicts between neighbouring land uses, risk of inflating farmland prices, and increasing costs to municipalities. A continuous land base for agriculture is vital, and interrupting large lots of land with residences severely limits options for agricultural use within a community. We do not support policies that will increase residential lot creation in agricultural and rural areas.

Minimum Distance Separation

BFO supports the use of Minimum Distance Separation (MDS) policies across the province as a means to prevent land use conflicts and minimize nuisance complaints between farming operations and surrounding residential land uses, and we believe MDS should continue to apply across the province. MDS training and online tools are offered by OMAFRA to support municipalities in implementing MDS policies, and we believe this training should be utilized further.

Rural Housing

The core element outlined within the proposal for rural housing states the new integrated policy instrument will respond to local circumstances and provide increased flexibility to enable more residential development in rural areas. We strongly believe this needs to be done in a way that supports local needs and creates housing within existing settlement areas, while also protecting agricultural lands and rural lands for agricultural purposes.

We firmly believe the path to meeting Ontario's housing development goals while ensuring Ontario's finite agricultural lands are not lost in the process, is to ensure urban boundaries are fixed and that development focuses on densifying in urbanized areas. It is possible to build complete communities while minimizing sprawl and preventing further farmland loss. Especially in urban areas where density does not exist due to exclusionary zoning rules.

It is evident the preservation and protection of the existing agricultural land base is critical for the future sustainability of Ontario's food systems, the provincial economy and in the fight against climate change. The current unsustainable loss of agricultural lands needs to be seriously addressed. Long-term actions to protect agricultural lands that do not pit areas of the province against one another need to be examined. The province must find a way to balance the need for increasing our housing supply with the need to better protect our farmland.

Thank you for the opportunity to provide feedback on the *Review of A Place to Grow and Provincial Policy Statement* proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Chaffe". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Jack Chaffe
President