



October 21, 2019

Planning Consultation  
Provincial Planning Policy Branch  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, Ontario M5G 2E5

To whom it may concern,

Re: ERO #019-0279 Provincial Policy Statement Review – Proposed Policies

Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments as part of the Provincial Policy Statement (PPS) review. BFO represents the 19,000 beef farmers across Ontario by advocating in the areas of policy planning, industry development and research, environment, animal health and welfare, and domestic and export market development.

BFO supports the Ontario government's commitment to reviewing the PPS, and believes this review to be an opportunity to better protect agricultural uses of our province's valuable land.

Ontario's farmland has been disappearing at an alarming rate, with the land that beef and other ruminant livestock depend on often being the first to be developed for non-agricultural uses. At an even faster loss rate than the category of farmland as a whole, pastureland in Ontario shrank by 30% and hay acreage shrank by almost 33% from 2006 to 2016. Hand-in-hand with the shrinking agricultural grassland acreage is the corresponding decline in Ontario's cow herd, with cow numbers down by 33% over the past 10 years.

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. Added priority needs to be placed on the protection of farmland in order to maintain sufficient capacity to produce food for the growing population. 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. The income derived from the beef industry helps support a broad range of rural infrastructure such as hospitals, schools and community centers. Ontario's beef industry is vitally important to the well-being and growth of families, businesses and communities.



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.

Regarding specific aspects of the proposed policies within the PPS, BFO has the following comments.

## **Settlement Areas**

### **Policy 1.1.2**

BFO supports extending the planning horizon from 20 to 25 years, as it will hopefully provide more certainty on where development will occur and result in less frequent additions to urban areas. However, this change perhaps doesn't go far enough. Fixed urban settlement boundaries for the duration of the 25-year period, plus the addition of "greenfield" density requirements and other intensification policies, would provide even more certainty for rural and agricultural areas that are in the path of expanding settlement areas and urban boundaries.

### **Policies 1.1.3.6 and 1.1.3.7**

There has been a change of language in these two sections that replaces the word "shall" (a requirement) to "should" (a recommendation). BFO opposes this change of language in both sections, because softening of language in this way weakens the important and necessary expectations that:

- development occurs adjacent to existing built-up areas
- development has a compact form, mix of uses, and densities that allow for efficient use of land and infrastructure
- intensification and redevelopment targets are achieved prior to, or concurrent with, new development
- there is an orderly progression of development and timely provision of infrastructure

### **Policy 1.1.3.8**

This section lays out the criteria for identifying or expanding a settlement area, including requirements for assessing agricultural impact and using minimum distance separation (MDS) when settlements expand into prime agricultural land. BFO strongly supports the continued inclusion of these requirements. However, BFO requests that 1.1.3.8 e) use the explicit language of requiring agricultural impact assessments, using OMAFRA's official "Guidance Document for Agricultural Impact Assessments".

## **Rural Lands**

### **Policy 1.1.5.2**



This section lists permitted uses on rural lands, with agricultural uses, agriculture-related uses, on-farm diversified uses and normal farming practices mentioned in an aside following the actual list. It is odd that agricultural uses, agriculture-related uses, on-farm diversified uses and normal farming practices are not included in the actual list and only mentioned after, when these are perhaps the most common uses of rural lands. These different agriculture uses should be item a) on the list.

#### Policy 1.7.1

This policy, under “Long-Term Economic Prosperity”, now includes more detailed language referring to “sustaining and enhancing the viability of the agricultural system through protecting agricultural resources, minimizing land use conflicts, providing opportunities to support local food, and maintaining and improving the agri-food network”. BFO strongly supports this change, which brings more consistency between the PPS and other provincial land use plans, such as the Growth Plan for the Greater Golden Horseshoe.

### **Agriculture**

#### Policy 2.3.1

This section sets out the definition of prime agricultural areas/lands: “Specialty crop areas shall be given the highest priority for protection, followed by Canada Land Inventory (CLI) Class 1, 2 and 3 lands, and any associated Class 4 through 7 lands within the prime agricultural area, in this order of priority.”

It is BFO’s position that all land used in Ontario for agricultural production should be officially designated as prime agricultural land. The beef industry depends on land that is often overlooked for the prime agricultural designation but is actually ideal for pasture and forages. The preservation of all land that is used for food production is imperative to the sustainability of agriculture in Ontario.

This change would allow for all regions and municipalities in Ontario to have prime agricultural land/areas in their official plans. There are currently a number of municipalities and/or regions in Ontario that do not have any Class 1 through 3 land and therefore do not have any prime agricultural land or areas, which leaves all their farmland with the more limited protection that comes with a rural land designation.

The current prime agricultural definition already includes associated Class 4 through 7 land, and we do not believe that defining prime agricultural land as all land currently used for agricultural production would add undue burden to municipalities. The definition is already halfway there, but there must be more clarity on the importance of Class 4 through 7 land.

CLI classes of land were designated in the 1950’s and primarily based on length of growing season and ability to grow corn. These should not be the primary factors for determining prime agricultural land/areas in 2019. Modern agriculture has crops maturing in far fewer days, making Class 4 through 7 land more valuable than ever. And besides, Ontario agriculture is much more than growing corn.

#### Policy 2.3.2

There is a new paragraph here *encouraging* planning authorities to use an agricultural systems approach to protect agricultural land and uses and the agri-food network. BFO has previously been a strong advocate for the agricultural systems approach, as it conceivably looks at the entire network of



agriculture, beyond CLI class designation. BFO strongly supports the addition of this paragraph, but it doesn't go far enough. Planning authorities must be *required* to use an agricultural systems approach.

#### Policy 2.3.6.1

The circumstances for permitting non-agricultural uses in prime agricultural areas used to include explicit requirement for MDS, but the point on MDS in 2.3.6.1 b) has been removed. BFO strongly opposes the removal of MDS – it needs to be included in this section.

#### Policy 2.3.6.2

This policy speaks to avoiding impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands, stating that this avoidance should be “informed by provincial guidelines”. BFO believes that the language here is too soft for such an important policy. We recommend changing to “in accordance with OMAFRA’s official “Guidance Document for Agricultural Impact Assessments””. This would also provide better alignment with policy 1.1.3.8 e).

### **Lot Creation and Adjustments**

#### Policy 2.3.4

BFO supports keeping the existing restrictions on lot severances. 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.

Additionally, BFO sees a gap in policy for addressing the too common occurrence of lots being bought in farming communities for non-agricultural uses with the residence built at or near the centre of the lot. We believe this growing residential development trend limits the potential for renting or utilizing already scarce land for agriculture and interrupts our province's agricultural system and agri-food network. Continuous land base for agriculture is vital, and interrupting large lots of land with residences severely limits options for agricultural use within a community. However, there is an opportunity for municipalities to utilize agricultural impact assessments for determining, mitigating and avoiding the impacts of this type of residential development on surrounding farms and the agricultural system. Agricultural impact assessments should be required as part of the permit process for residential builds on Ontario's diminishing agriculturally productive land.

### **Definitions of Permitted Uses on Agricultural Land**

Proposed definitions of permitted uses on agricultural land will bring consistency with OMAFRA's “Guidelines for Permitted Uses on Prime Agricultural Land”, which BFO supports. However, BFO believes that ground-mounted solar should not be acceptable or permitted on prime agricultural land (or any land that is used for agricultural production). Ground-mounted solar is one of the beef industry's biggest competitors for land in some parts of the province, and has no place on prime agricultural land, even as an on-farm diversified use. There is currently no restriction on ground-mounted solar on prime agricultural land since the dissolution of the *Green Energy Act*, and this policy gap must be addressed. BFO recommends that ground-mounted solar be fully restricted from all prime agricultural land.

### **Implementation and Interpretation**



## By-laws

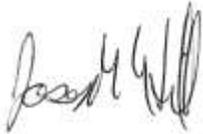
Local issues regarding land use planning decisions often come down to municipalities' outdated or inconsistent by-laws. Municipalities are required to update their official plans every five years, but there is no enforced requirement for updating by-laws. Understanding that this would require a change to the *Planning Act*, BFO recommends considering a requirement for updating by-laws on a set schedule that is in line with updating official plans.

## Guidance Materials

Over the years, the provincial government has developed a range of useful guidance materials to assist in the implementation of the PPS (e.g. "Guidelines for Permitted Uses on Prime Agricultural Land", "Guidance Document for Agricultural Impact Assessments"). However, the PPS does not include a list of guidance materials and they are quite difficult to find on MMAH's website. Guidance materials help official planners, but the lack of easy access to these materials leads planners to rely on third-party organizations that lack the credentials of provincial review and approval. Provincially developed and approved materials must be listed in Section 4 of the PPS, Implementation and Interpretation, and more easily found online.

Beef Farmers of Ontario would like to thank the Ministry of Municipal Affairs and Housing for the opportunity to comment on the proposed amendments to the Provincial Policy Statement. We would be pleased to answer any questions on the comments contained in this document, and we look forward to participating in further discussions on land use policy.

Sincerely,



Joe Hill  
President

cc: BFO Board of Directors

