



Friday, December 23, 2022

Sent via Environmental Registry of Ontario Submission

Re: More Homes Built Faster Act, 2022 (Bill 23)
ERO # 019-6177 – Review of A Place to Grow and Provincial Policy Statement

Dear Minister Clark,

Thank you for the opportunity to provide comments on the Province's *More Homes Built Faster Act* to support the Housing Supply Action Plan and Bill 23 – *More Homes Built Faster Act*. We are writing you this letter directly on behalf of the Agricultural Advisory Committee of the County of Brant, as well as providing a written submission through the Environmental Registry of Ontario.

The Agricultural Advisory Committee in the County of Brant is an advisory committee to Council that provides expertise on agriculture and provide comments on applications that are related to or may impact agricultural operations in the County of Brant. We understand the impacts of the ongoing housing affordability and supply crisis, and we support the need for action and change within Ontario's land use planning framework to address this crisis.

Given the scope of the changes approved with Bill 23 and its rapid approval process, it has been impossible for us to comment meaningfully on all sections, but we wish to express concern with changes that will significantly affect the food and farming cluster of the Golden Horseshoe and the components of the agri-food network in the County of Brant and beyond.

Two important mechanisms for the protection of agricultural lands in the fastest growing part of the province have been strict limitations to settlement area boundary expansions and the application of the Agricultural Systems approach. The proposal to combine the *Growth Plan* and the *Provincial Policy Statement* will serve to better protect the scarce, high quality agricultural lands that we have left in Southern Ontario if these two policies tools are strengthened and carried forward, not undermined. Urban development continues to threaten the agricultural land base, with the 2021 Census of Agriculture showing Ontario loses 319 acres (129 hectares) of farmland per day. Ontario's farmland is a finite and shrinking resources, and the agri-food sector contributes over \$47 billion dollars to Ontario's annual GDP.

We believe that while Bill 23 and the changes to Ontario planning framework seek to reduce administrative barriers that currently exist to prevent housing to be built in a timely manner, these changes must not come at the cost of our ability to provide food, fibre, and fuel. While frivolous objectives must certainly be reduced, we must not lose sight of the essential objectives of our planning framework that must remain in place to ensure this province has a variety of housing, built in the right places, with affordable infrastructure, and growth that pays for growth. Priority must remain to protect scarce agricultural lands and natural features for future generations.

Sincerely,

Kevin Hodge, Chair

On behalf of the Agricultural Advisory Committee of the County of Brant