



Durham Region Federation of Agriculture
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The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON
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Submitted via email to: minister.mah@ontario.ca and PlanningConsultation@ontario.ca
and submitted online via the Environmental Registry of Ontario (ERO)

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

The Durham Region Federation of Agriculture (DRFA) is one of 51 county and regional federations across the province that is an affiliate of the Ontario Federation of Agriculture (OFA). DRFA represents the voice of agriculture in Durham Region and advocates on behalf of our over 1100 farm families & agri-business members in Durham on local agricultural issues.

DRFA appreciates this opportunity to provide input to the proposed policy changes to the Provincial Policy Statement (2020).

We recognize that Durham Region is one of the fastest growing regions in Canada, but this growth cannot come at the expense of agricultural lands.

The Durham Agriculture community is proud of its contributions to the overall economic prosperity of the Region of Durham and its part of the economic powerhouse of agriculture across the province of Ontario.

Agriculture is the #1 contributor to the Region of Durham's economy. Based on 2021 census data, agriculture is Durham Region's largest goods producing industry and is home to 1200 farms and 3360 agri-food business establishments. The local agri-food sector employed 27,105 people. From 2016 – 2021 Durham's gross farm receipts increased by \$96.4 million from \$257.6 million to \$354 million. This is a 27.2% increase over a 5- year period.

Over half (52%) of Canada's prime soils are in Ontario and that farmland makes up less than 5% of Ontario's land base. Yet, from 2016 to 2021, the Census of Agriculture indicated that Ontario lost the equivalent of 319 acres a day. The average farm size in Durham Region is 220 acres.

Over the period from 2000 – 2017, 4183.5 acres of farmland in Durham Region were lost as a result of Official Plan Amendments.

Our agricultural areas provide us not only with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all residents, whether in Durham Region or the Greater Golden Horseshoe and beyond.

Settlement Area Boundary Expansions

The DRFA strongly opposes the proposed changes to settlement area boundary expansion policies. Higher-density development is needed to limit agricultural land loss.

The requirement to justify need and also conduct a comprehensive review must be maintained and not removed in the policy wording. Allowing these changes could lead to inconsistent implementation across municipalities, agricultural land fragmentation and inconsistent protections and considerations for agricultural land across municipal boundaries.

The DRFA supports fixed, permanent urban boundaries to limit the loss of agricultural land and to focus future urban growth within existing urban boundaries. This means urban growth primarily through redevelopment of vacant and underused lands, and higher density development. In urban areas, higher density development should be mandated province wide to take full advantage of existing infrastructure.

Agricultural Impact Assessments (AIAs)

AIA policies from A Place To Grow should be incorporated directly into the proposed PPS policies on settlement area boundary expansions, as the current policy outlines and including APTG Policy 2.2.8.3 h) “any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment;”.

The use of AIAs ensures that agricultural uses continue, and normal farm practices are protected. AIAs identify opportunities to increase compatibility between agricultural and non-agricultural uses by looking for ways to avoid, minimize, then mitigate adverse impacts on agricultural operations and the Agricultural System.

Agricultural Systems Mapping

The Provincial Agricultural Systems mapping, through consistent criteria and methodology is an important tool for municipalities to identify their most productive agricultural lands and the businesses supporting the agriculture industry.

The DRFA supports the extension of the Agriculture Systems Mapping and approach to be **required** across the province rather than encouraged as per 4.3.1.1.

The removal of Provincial Agricultural Systems policies and mapping, lessens protection for agricultural and natural heritage lands.

Lot Creation and Additional Residential Units

We understand that the three-lot severance proposal will not be moving ahead, however, we will reiterate that DRFA does not support further lot creation and severances. The creation of

additional lots and severances would only mean that additional incompatibility issues would be introduced for current and future farm operations, presenting even more challenges to carry out normal farm practices.

We can support Additional Residential Units (ARUs) on existing farm parcels, and in rural hamlets and communities as this supports our agricultural system. ARUs should be subordinate to the principal dwelling on an agricultural parcel, but no additional lot severances are to be made on these parcels.

However, the criteria and specifics for enabling ARUs will require being further defined. The Ontario Federation of Agriculture in consultation with other local federations across the province, like DRFA is well suited to provide input in the development of guidelines/BMPs for ARUs.

Minimum Distance Separation (MDS)

The MDS formulae are a proven means of separating livestock facilities and permanent manure storages from neighbouring land uses. The use of MDS reduces health and safety risks and/or complaints from neighbouring land uses arising from livestock/manure odours and practices.. The DRFA supports and values the rationale and use of the MDS formulae and guidelines to provide sufficient separation between new or expanding agricultural livestock buildings and uses and neighbouring non-agricultural buildings and uses, again to lessen the likelihood of odour complaints or health and safety risks or concerns.

Employment Lands

Changes in Employment Lands policies may impact agricultural land use and therefore it is prudent to be cautious of making the changes proposed.

Municipal Flexibility

DRFA concurs with the OFA, that the PPS should be a baseline that allows for some flexibility. Municipalities should be allowed to be more restrictive within the local policy so long as it is in accordance with provincial policy.

Farmland provides not only local food, but helps to protect habitat and wetlands which then help in water management and mitigates climate change. Agricultural practices such as conservation tillage, cover cropping and rotations, and in sequestering carbon into soils.

To be clear, as an industry, we are not opposed to development outright. On the contrary, further population growth and prosperity is in our collective interest. Growth management to meet housing demand and farmland protection are two sides of the same coin. However, in addressing the housing affordability crisis the focus must be on more protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements. This will achieve community development and farmland protection objectives.

Intensification will boost economic growth, create new jobs, provide new affordable housing options, support municipal infrastructure systems, ensure food security, and contribute to environmental stewardship.

Thank you for the opportunity to provide our feedback from an important agricultural perspective on the proposed Provincial Planning Statement.

Sincerely,

Edward Beach

Ed Beach
President, Durham Region Federation of Agriculture

cc: Patrice Barnes, MPP Ajax
Peter Bethlenfalvy, MPP Pickering – Uxbridge
Lorne Coe, MPP Whitby
Jennifer French, MPP Oshawa
Todd McCarthy, MPP Durham
Laurie Scott, MPP Haliburton-Kawartha Lakes-Brock