



The Regional Municipality of Durham

Durham Agricultural Advisory Committee Agenda

Tuesday, September 12, 2023

7:30 PM

THIS MEETING IS BEING HELD IN-PERSON

Meeting Room 1A
Regional Municipality of Durham Headquarters
605 Rossland Road East, Whitby

Please note: The Region of Durham continues to hold electronic meetings for Advisory Committees with limited in-person attendance at this time. Members of the public may [view the Committee meeting](#) via live streaming. If you wish to register as a delegate regarding an agenda item, you may register in advance of the meeting by noon on the day prior to the meeting by emailing delegations@durham.ca and will be provided with the details to delegate electronically.

1. Roll Call

2. Declarations of Interest

3. Adoption of Minutes

- A) Durham Agricultural Advisory Committee meeting held on June 13, 2023
([Attachment 1](#))

4. Presentations

- A) Shauna Muir, Supervisor, Public Affairs & Corporate Communications, City of Pickering – Pickering Corporate Strategic Plan

5. Discussion Items

- A) Rural and Agricultural Economic Development Update – S. Jibb & A. De Vos
B) Avian Influenza and Backyard Chickens – S. Jibb

If this information is required in an accessible format, please contact 1-800-372-1102 ext. 2548.

- C) Agriculture 101 Training – S. Jibb & A. De Vos
- D) 2023 Farm Tour Sub-Committee Report – D. Risebrough

6. Information Items

- A) Office of the Auditor General of Ontario - [Special Report on Changes to the Greenbelt](#)
- B) Office of the Integrity Commissioner - [Re: The Honourable Steve Clark, Minister of Municipal Affairs and Housing and Member of Provincial Parliament for Leeds–Grenville–Thousand Islands and Rideau Lakes](#)
- C) [#2023-INFO-64](#) - Proposed Provincial Planning Statement Update
- D) Uxbridge Proposed Urban Provincial Park
- E) [#2023-EDT-10](#) – Precision Agriculture Field Day
- F) Ontario Federation of Agriculture (OFA) Provincial Planning Statement Submission ([Attachment 2](#))

7. Other Business

8. Date of Next Meeting

October 10, 2023

Notice regarding collection, use and disclosure of personal information:

Written information (either paper or electronic) that you send to Durham Regional Council or Committees, including home address, phone numbers and email addresses, will become part of the public record. This also includes oral submissions at meetings. If you have any questions about the collection of information, please contact the Regional Clerk/Director of Legislative Services.

If this information is required in an accessible format, please contact 1-800-372-1102 ext. 2097.

The Regional Municipality of Durham

MINUTES

DURHAM AGRICULTURAL ADVISORY COMMITTEE

June 13, 2023

A meeting of the Durham Agricultural Advisory Committee was held on Tuesday, June 13, 2023 in Meeting Room 1-A, Regional Headquarters Building, 605 Rossland Road East, Whitby, Ontario at 7:30 PM. Electronic participation was offered for this meeting.

1. Roll Call

Present: Z. Cohoon, Member at Large, Chair
R. Death, Whitby
N. Guthrie, Ajax
B. Hulshof, Uxbridge
G. O'Connor, Member at Large
D. Risebrough, Member at Large, Vice-Chair
H. Schillings, Member at Large
M. Shiers, Durham Region Federation of Agriculture
B. Smith, Uxbridge, Vice-Chair
M. Somerville, Member at Large
D. Stevenson, Oshawa
N. Swain, Scugog
G. Taylor, Pickering
T. Watpool, Brock
W. Wotten*, Regional Councillor

*** denotes members of the Committee participating electronically**

Absent: T. Barrie, Clarington

Staff

Present: A. De Vos, Program Specialist, Department of Planning and Economic Development
C. Goodchild, Manager, Policy Planning & Special Studies
S. Jibb, Manager, Agricultural & Rural Economic Development, Department of Planning and Economic Development
R. Inacio, Systems Support Specialist, Corporate Services – IT
M. Scott, Project Planner, Department of Planning and Economic Development
K. Smith, Committee Clerk, Corporate Services – Legislative Services

2. Declarations of Interest

There were no declarations of interest.

3. Adoption of Minutes

Moved by G.L. O'Connor, Seconded by T. Watpool,
That the minutes of the Durham Agricultural Advisory Committee meeting
held on Tuesday, May 9, 2023, be adopted.

CARRIED

4. Discussion Items

A) Rural and Agricultural Economic Development Update

A. De Vos provided the following update:

- The Precision Agriculture Field Day was hosted by the Barrie Family on May 30 and was offered to high school students to advise of career opportunities in agriculture and general exposure on how precision agriculture technology is used to produce food. There has been discussion to make this an annual event.
- Local Food Week took place the week of June 5th which included campaigns for Durham Farms and Local Food and identified the Village of Newcastle as the apple capital of Canada.

S. Jibb provided the following update:

- It was the consensus of staff to not continue to work on the On-Farm Diversified Toolkit at this time with the Provincial Policy changes and instead will shift their focus to educating staff on the Provincial guidelines for On-Farm Diversified Uses.

B) Avian Influenza and Backyard Chickens

S. Jibb provided the following update:

- The Township of Brock is looking into introducing backyard chickens and changing their by-law.
- The City of Pickering Council adopted the staff recommendation to not proceed with a backyard chicken pilot project.
- Hubert Schilling delegated to the City of Pickering on Monday, June 5, 2023 to speak on this topic.

C) Agriculture 101 Training

A. De Vos provided the following update:

- Zac Cohoon presented to Regional Council regarding the Agriculture 101 Training. There was discussion to provide the training to local municipalities.

Discussion ensued with regards to providing the Agriculture 101 Training in the late fall/winter; making the training specific to each lower tier municipality; how to get the training onto the lower tier agendas; the length of the presentation to Regional Council and shortening the version to the lower tiers; ensuring appropriate staff are in attendance for the training; who will be providing the training to the lower tier municipalities; and the priority of topics to be included in the training. Scugog Council will be the first local tier presentation.

D) 2023 Farm Tour Sub-Committee Report

D. Risebrough advised the Farm Tour will take place on Thursday, September 21, 2023 and will be hosted by Carncroft Farm and Swain Beef Farm with registration beginning at 11:00 AM and lunch at 12:00 PM; the guest speaker is the Director of Meat & Poultry Ontario; and the presentation of the two farms will take place at 1:00 PM. He further advised that assistance is needed from Committee members for the set up and take down of equipment used for the event at the locations.

E) Durham Regional Official Plan Update

M. Scott advised that the new Durham Regional Official Plan was adopted by Regional Council on May 17, 2023 and has been sent to the Province for approval. He further advised he would provide an update when they hear back from the Province with any changes.

F) Regional Development Charge By-law

S. Jibb advised she had a discussion with the Regional Development Charge (DC) working group and discussed the comments raised at the May 9th Durham Agricultural Advisory Committee meeting in terms of the On-Farm Diversified Uses and Building definition in the DC By-law, and that it was the consensus that more time was needed to look into the definitions. She further advised that there will be a presentation on this topic at the October 10th meeting.

Discussion ensued with regards to whether comments received from the committee can be brought up through an amendment to the by-law or if it has to be done during the next by-law study; and working with the Planning Division to assist with defining On-Farm Diversified Uses appropriately.

G) Region of Durham Annual Business Count

M. Scott advised the Region of Durham Annual Business Count is open at durham.ca/businesscount and that they will not be conducting it in person this year due to the Avian Influenza.

H) Consultation on Proposed Changes to Part XV of the Health of Animals Regulations (Identification and Traceability)

M. Scott advised that any comments from the Committee on the regulations are due by June 16, 2023. He further advised that fair boards will have to take control over tracking the animals that are coming to and leaving each fair and that it was previously done by the exhibitor.

Moved by T. Watpool, Seconded by B. Smith,
That the Durham Agricultural Advisory Committee supports the Agriculture Societies in maintaining the exhibitors as the source of traceability for animals attending fairs.

CARRIED

5. Information Items

A) DAAC Workplan and Terms of Reference 2023

Report #2023-P-16 of the Commissioner of Planning and Economic Development – DAAC Workplan and Terms of Reference 2023 was provided as a link to the Agenda and received.

M. Scott advised that Report #2023-P-16 of the Commissioner of Planning and Economic Development was approved by the Planning and Economic Development Committee on June 8, 2023 and will be presented to Regional Council on June 28, 2023.

B) Durham Agricultural Advisory Committee Resolutions

Durham Agricultural Advisory Committee Resolutions included in the June 6, 2023 Planning and Economic Development Committee agenda was provided as a link to the Agenda and received.

C) Report #2023-P-15 – Envision Durham – Recommendations on the New Regional Official Plan

Report #2023-P-15 of the Commissioner of Planning and Economic Development – Envision Durham – Recommendation on the New Regional Official Plan was provided as a link to the Agenda and received.

M. Scott advised that Report #2023-P-15 of the Commissioner of Planning and Economic Development was approved by Regional Council at the Special Regional Council meeting held on May 17, 2023.

D) Notice of Adoption – Regional Official Plan

Notice of Adoption of the Regional Official Plan dated May 30, 2023 was provided as Attachment #2 to the Agenda and received.

E) Durham Region's Response to Provincial Consultation on Bill 97 – the Helping Homeowners, Protecting Tenants Act, 2023, the Proposed Provincial Planning Statement, and Related ERO Postings #019-6821, #019-6822, #019-6813

Report #2023-P-19 of the Commissioner of Planning and Economic Development – Durham Region's Response to Provincial Consultation on Bill 97 – the Helping Homeowners, Protecting Tenants Act, 2023, the Proposed Provincial Planning Statement, and Related ERO Postings #019-6821, #019-6822, #019-6813 was provided as a link to the Agenda and received.

M. Scott advised that Report #2023-P-19 of the Commissioner of Planning and Economic Development was approved by the Planning and Economic Development Committee on June 8, 2023 and will be presented to Regional Council on June 28, 2023.

F) Joint Statement from Ontario's Farm Leaders on Bill 97 and Proposed Provincial Planning Statement

Joint Statement from Ontario's Farm Leaders on Bill 97 and Proposed Provincial Planning Statement was provided as Attachment #3 to the Agenda and received.

G) CBC News Article – Farmers Pressure Doug Ford Government to Reverse Course on Housing Plan

CBC News Article entitled Farmers Pressure Doug Ford Government to Reverse Course on Housing Plan was provided as a link to the Agenda and received.

Z. Cohoon advised that Mike Crawley attended at his farm to prepare the news article. He further advised that M. Crawley was invited to the Durham Agriculture Advisory Committee Farm Tour.

H) Development of Lands Removed from the Greenbelt

Report #2023-COW-23 of the Chief Administrative Officer – Development of Lands Removed from the Greenbelt was provided as a link to the Agenda and received.

M. Scott advised that Report #2023-COW-23 of the Chief Administrative Officer will be presented to the Committee of the Whole on June 14, 2023 and to Regional Council on June 28, 2023.

I) Brock Backyard Chickens Proposal

Township of Brock's Backyard Chickens Proposal survey was provided as a link to the Agenda and received.

J) Local Food in Durham Region: Durham Farm Fresh Marketing Association Annual Update and Ontario Local Food Week

Report #2023-EDT-8 of the Commissioner of Planning and Economic Development – Local Food in Durham Region: Durham Farm Fresh Marketing Association Annual Update and Ontario Local Food Week was provided as a link to the Agenda and received.

S. Jibb advised that Report #2023-EDT-8 of the Commissioner of Planning and Economic Development was approved by the Planning and Economic Development Committee on June 8, 2023. She further advised that Rob Alexander, President, Durham Farm Fresh Marketing Association delegated to the Planning and Economic Development Committee on June 8, 2023 and it was well received.

K) Durham Environment and Climate Advisory Committee Minutes – April 20, 2023

Durham Environment and Climate Advisory Committee minutes dated April 20, 2023 was provided as a link to the Agenda and received.

6. Other Business

There was no other business.

7. Date of Next Meeting

The next meeting of the Durham Agricultural Advisory Committee will be held on Tuesday, September 12, 2023 starting at 7:30 PM.

8. Adjournment

Moved by D. Risebrough, Seconded by H. Schillings,
That the meeting be adjourned.

CARRIED

The meeting adjourned at 8:29 PM

Respectfully submitted,

Z.Cohoon, Chair

K. Smith, Committee Clerk



200 Hanlon Creek Boulevard
Guelph, ON N1C 0A1

Tel: 519.821.8883
Fax: 519.821.8810

July 31, 2023

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Sent via email to: minister.mah@ontario.ca and PlanningConsultation@ontario.ca
and submitted online through the Environmental Registry of Ontario

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 policy instrument.

Thank you for the opportunity to participate in the consultation process for planned policy changes to the PPS. Our topline feedback is summarized below:

- **Settlement Area Boundary Expansions:** OFA strongly opposes changes to settlement area boundary expansion policies, we believe that higher-density development is needed to limit agricultural land loss.
- **Additional Residential Units (ARUs):** OFA supports ARUs on existing farm parcels and rural hubs, but we have concerns about lack of criteria and specificity.
- **Minimum Distance Separation (MDS):** Ontario farmers value the MDS formulae as a proven means of separating livestock facilities and permanent manure storages from neighbouring land uses.
- **Employment Lands:** OFA would like to caution against changing Employment Lands policies, as it may impact agricultural land use.
- **Municipal Flexibility:** OFA believes 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.
- **Agricultural Impact Assessment (AIA):** OFA supports AIA inclusion for land use proposals and has some concerns about the granting of exceptions.
- **Natural Heritage & Water:** OFA believes that the Provincial Planning Statements should not remove the words “all municipal” from section 4.2.1(e)(1). OFA is a strong advocate of protecting water supplies and wetlands, in a way that prioritizes Normal Farm Practices.

Protecting the Future of Farming

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

Ontario's agri-food sector is an economic powerhouse – producing more than 200 farm and food products, fuelling rural communities, generating nearly 750,000 jobs and contributing more than \$47 billion to Ontario's annual GDP. The province's agri-food strategy, Grow Ontario, aims to strengthen the agri-food sector, support economic growth and ensure an efficient, reliable and responsible food supply. By removing barriers, unnecessary costs and red tape, Ontario farmers will be positioned to seize opportunities and rise to the challenge of an ambitious growth strategy, allowing the agri-food sector to continue to drive the economy forward.

We appreciate the reconsideration of the lot creation issue on agriculturally zoned properties. The original direction would have had significant potential impacts on agricultural operations across this province, and we thank you, Minister, for the change. We have reviewed the remaining policies originally proposed within the statement using an agricultural lens, and provide the following comments.

Agricultural System Mapping and Agricultural Land Protections

OFA is a strong advocate for the protection of Ontario's farmlands for their long-term ability to produce food, fibre, fuel, flowers and nursery stock, not only for Ontario's growing population, but also for consumers beyond our borders.

OFA believes that farming to produce food, fibre, fuel, flowers and nursery stock is the best use for farmland. Ontario's limited supply of farmland is a scarce resource, making up less than five per cent of all the land in the province. It's vital that Ontario has a strong, viable and sustainable supply of food products grown, harvested and processed right here at home. Ontario's shrinking agricultural land base is alarming. The current rate of loss is measured at 319 acres per day in our province, according to the 2021 Census of Agriculture. These losses are not sustainable.

We also wish to emphasize that there is only one Ontario landscape. The full range of urban, rural, agricultural, natural heritage, cultural heritage and mineral extraction land uses must coexist across this landscape.

Provincially, the protection of Ontario's prime agricultural areas for their long-term agricultural use must be a key objective. It is one thing to think about housing the anticipated additional two million people that will reside in Ontario over the next 10 years, but it is another to think seriously about how we will feed this increasing population. Ontario's agricultural lands are a finite and shrinking resource. We cannot sustain continuing losses of agricultural land while maintaining our ability to produce food, fibre, fuel, flowers and nursery stock from this limited and declining agricultural land base. Therefore, any proposals looking at increasing housing supply must be done with consideration to the needs and support of the agricultural community.

OFA endorses the 2020 Provincial Policy Statement (PPS 2020)'s Agriculture policies [Section 2.3] that require municipalities protect their prime agricultural areas for their long-term agricultural use. We further support the flexibility afforded to farmers to engage in on-farm value adding of primary farm products, as well as agriculture-related, on-farm diversified and agri-tourism uses. We believe that prime agriculture lands should be defined as Class 1-6 plus speciality crop lands. Classes 4-6 support agricultural activities such as grazing livestock, growing crops for biofuels, and the agriculture sector has demonstrated that the productivity of this land can be improved through activities such as tile drainage, stone picking and addition of lime. Provincial policy must continue to protect specialty crop areas because they are scarce and unique; if lost, they cannot be recreated. They are important economically and represent some of Ontario's highest-earning agricultural lands. In addition, they provide many value-added and agri-tourism opportunities.

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. The proposed change to add multi-lot residential development as a permitted use on rural lands within section 2.6.1 is very concerning. We believe unrestricted growth in rural areas will have negative consequences, especially for the preservation of agricultural lands. Land use planning in Ontario must balance opportunities for growth with the need to preserve our agricultural lands, regardless of whether it is zoned rural or agricultural. Focusing growth in existing settlement areas will support local economies, reduce farmland loss and reduce land use conflicts.

We believe strongly in the PPS 2020 Agriculture policies that govern farmland and rural areas, protecting the right to farm and the Agriculture System in Ontario. In addition to this, OFA believes strongly that the fragmentation of farmland in rural areas is counterproductive for the agricultural business structure in Ontario's rural areas.

OFA is against the removal of the requirement to use the provincially mapped agricultural system as it would allow for agricultural fragmentation, inconsistent classification of agricultural lands and specialty crop areas and disconnect in agricultural land mapping and classifications across municipal boundaries.

Settlement Area Boundary Expansions

OFA is strongly against the proposed changes to settlement area boundary expansion policies. Specifically, changes in functional policy language have removed both the requirement to justify need and to conduct a comprehensive review, as such could result in uncertainty and ambiguity for the process, expectations, and requirements for these expansions. OFA believes that these changes could lead to inconsistent implementation across municipalities, agricultural land fragmentation and inconsistent protections and considerations for agricultural land across municipal boundaries.

OFA supports fixed, permanent urban boundaries to limit the loss of agricultural land, thereby focusing future urban growth within existing urban boundaries. This means urban growth primarily through redevelopment of vacant and underused lands, and higher density development.

We further believe that in urban areas, higher density development should be mandated provincewide to take full advantage of existing infrastructure. OFA supports urban

intensification/densification as one way to protect agricultural land and create complete communities.

OFA believes that urban areas should only be allowed to expand onto abutting agricultural lands only after exhausting redevelopment of underused or vacant areas within their existing urban boundaries. This would include the rehabilitation and redevelopment of both “greyfield” and “brownfield” sites. Lastly, urban expansion onto abutting agricultural land must be directed onto lower class agricultural land adjacent to the existing urban boundaries.

OFA does not support scattered or strip development within prime agricultural areas. This form of development not only limits the ability of new and existing agricultural operations to function but fails to contribute financially to municipalities. OFA believes that urban expansion should only be permitted onto abutting agricultural lands where municipal sewer and water services are available.

OFA wants to see PPS policies in Section 1.1.3.8 remain as is. Keeping these policies intact (and holding municipalities and MMAH accountable to following these policies) is critical for meeting joint goals of balancing farmland protection with urban development. Further, OFA wants to see Agricultural Impact Assessment (AIA) policies from APTG incorporated directly into the proposed PPS policies on settlement area boundary expansions (APTG Policy 2.2.8.3 h). Specifically referencing AIAs as the current policy outlines:

“Where the need for a settlement area boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following: ... 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;” (APTG Policy 2.2.8.3 h).

As Ontario becomes more urbanized, municipal councils and staff may not apply an agricultural lens to their plan-, policy- and decision-making. This is critical as we need to plan for ‘farm-friendly’ urban development that promotes compatibility at the urban-agricultural interface. For example, parcel size, configuration, building setbacks, road patterns, institutional locations, drainage patterns and location of municipal servicing will all have implications for agriculture.

OFA firmly believes in the widespread use of AIAs, as it 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.

Lot Creation and Additional Residential Units

OFA is optimistic about the reconsideration of the proposed lot severance policies and are eager to work with the government to balance the need for housing with the protection of agricultural land without severances.

While OFA does not support further lot creation and severances, we do support Additional Residential Units (ARUs) on existing farm parcels, and in rural hubs, hamlets and communities to support our agricultural system. OFA would like to establish our support for additional dwelling units subordinate to the principle dwelling on an agricultural parcel but do not support the establishment of additional lot severances on these parcels.

In our previous submissions to the government regarding the PPS 2020, we have commented that the PPS 2020 does not go far enough in protecting our finite agricultural lands. We have recommended strengthening PPS 2020 in order to require fixed urban settlement boundaries and policies requiring mandatory intensification within the existing built urban areas as well as mandatory “greenfield” density requirements to better utilize infrastructure, improve the financial viability of public transit and protect our prime agricultural lands from sprawl.

While OFA is supportive of additional residential units, we do feel there needs to be further specificity in the policy. Our concerns include a lack of criteria for ARUs, insufficient consideration for onsite infrastructure and servicing, inconsistency between policies on provincial guidance, a lack of consideration for the distinctiveness of municipalities, and the exclusion of specificity surrounding whether these policies apply to both farm and rural lots.

OFA believes that there should be additional consideration of a set of criteria for ARUs as well as clarification on the extent of this policy. There is a distinct lack of inclusion for the type, size, scale, and location of these proposed ARUs that needs to be addressed as well as the clarification on whether this policy is exclusive to farm lots or includes rural lots as well.

Further, we are concerned that inconsistencies between policies on permitted uses in agricultural lands could lead to the misinterpretation or unpredictable development and approval of ARUs. Specifically, under section 4.3.2 Permitted Uses, 4.3.2.4 (principal dwellings) states that the policy must be in accordance with provincial guidelines, however, 4.3.2.5, does not include this provision. OFA believes that this exclusion in conjunction with the lack of criteria for ARUs could result in development that does not align with our position that farming to produce food, fibre, fuel, flowers and nursery stock is the best use for farmland.

Additionally, we must highlight the distinctiveness of municipalities across Ontario, both in their landscape as well as their governance ability and priorities. No two municipalities are alike, therefore flexibility within provincial level policies allows municipalities to address their local concerns in accordance with provincial policy. OFA believes the Ontario government needs to clarify the extent of provincial-level direction and as well as outline considerations and guidance for onsite infrastructure and servicing.

OFA sees that opportunities to build more rural housing should be concentrated within, and directed to, rural settlements and settlement areas as identified in APTG Policy and PPS (2020) Policies 1.1 “Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns,” 1.1.3 “Settlement Areas,” 1.1.4 “Rural Areas in Municipalities.” Density and intensification targets should be analyzed and identified in accordance with APTG methodology and appropriately applied to rural settlements and settlement areas.

Within rural lands, OFA recommends that agricultural uses, agriculture-related uses, on-farm diversified uses and normal farm practices should be protected and given higher priority as

permitted uses under PPS (2020) Policy 1.1.5.2 and throughout Policy 1.1.5 “Rural Lands in Municipalities.”

OFA previously requested that this proposal be applied to rural and smaller-town municipalities within designated rural settlements and settlement areas. We acknowledge the servicing capacity limits many rural communities in Ontario face, such as that with private water and wastewater services. However, rural communities also need additional housing. There are opportunities within existing smaller villages, hamlets and towns to increase density on parcels of land in the settlement area that are adequate for servicing and more efficiently contribute to the rural tax base. This would serve to eliminate the need for lot severances on agricultural lands while providing increased housing options across Ontario.

OFA welcomes the opportunity to be a part of a potential group to establish best management practices (BMPs) or regulations surrounding ARUs to effectively develop

Minimum Distance Separation

Ontario farmers value the MDS formulae as a proven means of separating livestock facilities and permanent manure storages from neighbouring land uses, thereby reducing health and safety risks and/or complaints from these neighbouring land uses arising from livestock/manure odours and practices. OFA wholeheartedly supports the use of the MDS formulae and guidelines to bring about adequate separation.

The OFA supports MDS, its rationale being to prevent encroachment by neighbouring non-agricultural uses on livestock farms by providing sufficient separation between livestock uses and buildings and neighbouring non-agricultural uses and buildings to lessen the likelihood of odour complaints as well as any health and safety risks or concerns.

The OFA also endorses the use of the MDS formulae 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

In our submission to the Standing Committee for Bill 97, OFA cautioned against changing the definition and policies for Employment Lands proposed in the *Planning Act* amendment in Schedule 6 of Bill 97. We would like to maintain that the resulting impacts of reduced protections for Employment Lands could result in increased pressure to utilize agricultural lands such as Prime Agricultural Lands and Specialty Crop Areas for employment uses in the future as well as put agricultural processing operations at risk.

Municipal Flexibility

OFA believes that the PPS should be used as a baseline and remove the provisions that limit the flexibility of municipalities. As we have highlighted, municipalities vary across the province, and it is OFA's belief that municipalities should be allowed to be more restrictive within the local policy so long as it is in accordance with provincial policy.

Agricultural Impact Assessment

While we are very happy to see that Agricultural Impact Assessment (AIA) is included in the definitions, we do believe that an AIA must (not should) be completed under section 2.3 Settlement Areas and Settlement Area Boundary Expansions. We are pleased to see the requirement for “avoiding, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment...” in section 4.3.5 Non-Agricultural Uses in Prime Agricultural Areas. We are also very pleased to see the application of 4.3.5.2 applied to Mineral Aggregate Extraction in Prime Agricultural Areas under 4.5.4.1.a. Avoiding impacts to agricultural areas from mineral extraction is an important protection of Ontario’s limited agricultural lands.

OFA is very pleased to see the requirement for an AIA or equivalent analysis for mineral extraction in prime agricultural areas, yet we remain concerned there are circumstances in which “complete rehabilitation to an agricultural condition is not required...” As established in 4.5.4.2. It is our belief that an application to extract minerals in prime agricultural areas that cannot be rehabilitated to an agricultural condition should not be approved on the basis that it does not meet the conditions of that application.

Natural Heritage & Water

OFA believes that the Provincial Planning Statements should not remove the words “all municipal” from section 4.2.1(e)(1). We believe that this section should remain: “Implementing necessary restrictions on development and site alteration to: 1. Protect all municipal drinking water supplies and designated vulnerable areas; ...”

OFA is pleased to see that the definition of “Wetlands,” as it currently exists in the Provincial Policy Statement, 2020, has been retained.

OFA is pleased to see that the statement in Section 4.1.9 has remained across the versions of the Proposed Provincial Planning Statement. However, to address potential conflicts between Natural Heritage and Agricultural landscapes OFA recommends the inclusion of a provision that gives priority to *Normal Farm Practices*.

We look forward to further engaging in future Natural Heritage policy discussions.

OFA notes the legend in Figure 1 requires updating to reflect the changes in section numbers.

We are concerned that combining *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* and the *Provincial Policy Statement, 2020* would diminish the protections and support for agricultural lands and community and therefore open the floodgates for a rash of developments that run counter to our overarching philosophy of farmland preservation which is paramount to our mission of “Farms and Food Forever.”

We request including greater specificity and guidance on these proposed policies as well as greater consideration for agricultural land, operations and community.



OFA appreciates the opportunity to provide our feedback and agricultural perspectives on the proposed Provincial Planning Statement. We look forward to working with the provincial government and our municipal counterparts to protect Ontario's farmlands as well as sustain Ontario's housing supply and communities.

Sincerely,


Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs
OFA Board of Directors