



February 20, 2019

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street
23rd Floor, Suite 2304
Toronto, ON
M5G 2E5

RE: EBR Registry # 013-4504 for input on the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. OFT achieves this through direct land securement, stewardship, policy research, and education to benefit all Ontarians.

Thank you for the opportunity to submit feedback on the proposed amendments to the Growth Plan for the Greater Golden Horseshoe, 2017. OFT has played an active stakeholder role in other provincial land use planning policy reviews, including those contained within the coordinated land use planning review in 2016, and is pleased to continue working with the province to refine and strengthen the Growth Plan for the Greater Golden Horseshoe (“Growth Plan”).

OFT applauds the Ministry’s ongoing commitment to the Agricultural System and recognition of the need for farmland protection within a broader network of supportive infrastructure, agricultural services, distributors, and processors. This further support Ontario’s agri-food sector, which is an economic engine for the province that annually contributes over \$39 billion to the GDP and employs more than 820,000 Ontarians along the supply chain [1]. This contribution is overwhelmingly significant in rural areas, where roughly 12% of the GDP and 10% of rural jobs are attributed to the farm sector [2].

The Ontario Farmland Trust has several recommendations to strengthen the proposed amendments to the Growth Plan with continued commitment to the vitality of the agri-food sector:



Growth Management & Targets

OFT commends the Ministry's renewed commitment to controlling unmanaged growth. However, we believe that the proposed reductions to the Growth Plan's density and intensification targets substantively reduces, if not eliminates, the Plan's capacity to achieve its vision and guiding objectives. When these lowered targets are paired with the simplified process for requesting alternatives, the doors are opened for a business-as-usual approach, which runs counter to the goals and objectives of the Growth Plan. More specifically, this approach continues to put farmland at risk due to the unmanaged growth of settlement areas. This risk is unacceptable for the longevity and viability of Ontario's agri-food sector.

The ongoing success and advancement of the agri-food sector will require a continued culture of good, conscientious planning that overcomes the pitfalls of unmanaged growth. Overcoming these pitfalls will require density and intensification targets exceeding those proposed. It will also require that these targets are mandatory for and adhered to by all municipalities, effectively closing the doors on a business-as-usual approach. With effective growth management, the Greater Golden Horseshoe (GGH) will continue to protect the contiguous agricultural land base required for agri-food business investment, thus protecting the sector's substantial economic contributions.

- 1) **OFT recommends that intensification and density targets remain as originally stated in the Growth Plan for the Greater Golden Horseshoe, 2017.** Meeting and exceeding the original Growth Plan density and intensification targets throughout the GGH is absolutely necessary to protect farmland and the viability of the agri-food sector. Affected sections: 2.2.2.1 and 2.2.7.2.

- 2) **OFT recommends that all targets are mandatory for all municipalities. If a policy allowing for applications for alternative targets is absolutely necessary, OFT recommends that the criteria existing in the current Growth Plan, 2017 is maintained.** As currently proposed, the simplified process for, and vague wording around, applications for alternative targets could lead to continued unmanaged growth. Affected sections: 2.2.2.4, 2.2.4.4, and 2.2.7.4.



- 3) **OFT recommends that the word “appropriate” be removed from section 2.2.1.4 (g).** As currently proposed, the wording is vague and open to interpretations of when low impact development is appropriate. To effectively achieve the Growth Plan’s vision for the GGH and uphold its Guiding Principles, low impact development must always be appropriate for, and incorporated into, complete communities.
- 4) **OFT recommends that additional direction and criteria are added to section 5.2.2.3.** Specifically, the conditions under which the Province will respond to municipal requests should be outlined. Furthermore, **OFT recommends that only those requests that add land to the agricultural land base mapping and improve protection for farmland and the Agricultural System are permitted.** The agricultural land base mapping requires a contiguous, permanently protected land base in conjunction with a complete agri-food network for continued viability. Any municipal requests that erode that land base or connectivity of its network will negatively impact the agri-food sector.

Boundary Expansion & Adjustment

OFT continues to contend that there is no valid justification for expansion of urban or rural settlement area boundaries for at least the next 25 years. A vast surplus of land has already been designated by municipalities to accommodate forecasted population and employment growth for the GGH through 2041 [3]. Settlement area expansion within the next planning period would result in an unacceptable loss of farmland, irreparable damage to the Agricultural System, and undermine the Province’s Growth Plan objectives. Establishing long-term fixed boundaries is necessary to shift urbanization patterns away from the dominant ‘perpetual urban sprawl’ model of growth, and toward healthy, complete communities.

If boundary expansions and adjustments continue to be permitted within the Growth Plan, they must be completed with the appropriate foresight and planning. The proposed amendments that are intended to expedite the expansion and adjustment processes threaten the viability of surrounding agricultural businesses and the agri-food sector as a whole by reducing the land-use certainty required for investment and increasing incentives for land banking near municipal borders.

- 5) **OFT recommends that settlement area boundary expansions or adjustments are only permitted as part of a Municipal Comprehensive Review (MCR).** The current proposal to allow settlement area boundary expansions or adjustments outside of an MCR

Ontario Farmland Trust, c/o University of Guelph, SEDRD, Guelph, ON N1G 2W1
(519) 824-4120 ext. 52654 | info@ontariofarmlandtrust.ca | www.ontariofarmlandtrust.ca



threatens to revert to an ad hoc approach to planning whereby municipalities respond to development proposals as opposed to planning in advance. Affected policies: 2.2.8.4 and 2.2.8.5

- 6) **OFT recommends that greater clarity be provided for the terms “minor adjustments” and “minor rounding out” in section 2.2.9.7.** Minor rounding out of rural settlements should only be used to achieve thoughtfully planned rural settlements that respect on-the-ground realities (e.g. resolving situations where agricultural plots are currently divided by the existing rural settlement boundary). This additional clarity would help prevent unmanaged growth, undue stress on rural infrastructure, and the destruction of farmland.
- 7) **OFT recommends that settlement area boundary expansions continue to require an Agricultural Impact Assessment (AIA).** The AIA details a systematic and standardized process for accomplishing the continued support of the Agricultural System and the actions required in section 2.2.8.3 (f).
- 8) **OFT recommends that the Guidance Document for Agricultural Impact Assessments is released in its full and final form.** The Draft Guidance Document for AIAs has already undergone a public commentary period and its release would provide additional guidance for proposed developments and projects requiring an AIA.

Agricultural System

OFT would like to commend the Ministry for its ongoing commitment to the Agricultural System. Acknowledging the many facets and dimensions of the agri-food sector is an important and necessary step towards ensuring its long-term viability. In this same vein, policies that prevent the fragmentation of prime agricultural lands and the agri-food network must be maintained and the Agricultural System held to the highest standard. This can be facilitated by applying the existing provincially issued land base mapping until municipalities are able to review, ‘ground truth,’ and implement the mapping at the municipal level.

- 9) **OFT recommends that provincially issued agricultural land base mapping continues to be the basis of the Growth Plan until such time that municipalities are able to refine/augment the agricultural land base as informed by municipal mapping.** This will accommodate the breadth of completion in municipal agricultural land base mapping

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(519) 824-4120 ext. 52654 | info@ontariofarmlandtrust.ca | www.ontariofarmlandtrust.ca



and, when in conjunction with section 4.2.6.9, will allow municipalities with detailed mapping to refine and augment the provincially issued mapping more quickly. Affected sections: 4.2.6.8.

- 10) OFT recommends that municipalities are required to provide justification when alterations to the agricultural land base mapping remove land from prime agricultural areas, as permitted in section 4.2.6.9.** While we support the new policy and the expedited option for Agricultural System implementation, it must not come at the cost of the erosion or fragmentation of prime agricultural areas.
- 11) OFT recommends that municipalities continue to be provided the option to “refine and augment provincial mapping” in section 4.2.6.9.**
- 12) OFT recommends that sufficient setbacks be required when non-agricultural uses are introduced adjacent to agricultural land.** Mandatory buffers or setbacks will help to reduce incompatibility concerns about non-agricultural uses and make it easier for farmers to continue running financially sustainable farm businesses without impacts on normal farm practices. This addition would be appropriate for section 4.2.6.3.

Thank you for this opportunity to share our recommendations and feedback on the Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further to strengthen the direction of the Growth Plan for the Greater Golden Horseshoe, 2017 and achieve its vision.

Most Sincerely,

Kathryn Enders
Executive Director
Ontario Farmland Trust



References:

- [1] Ontario Federation of Agriculture. 2018. *Agriculture Matters – A Guide for Municipal Councillors and Staff*. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Ontario Federation of Agriculture. 2013. *Economic Contribution of the Ontario Farm Sector 2013*. <https://ofa.on.ca/resources/economic-contribution-ontario-farm-sector-2013/>
- [3] The Neptis Foundation. 2013. *Implementing the Growth Plan for the Greater Golden Horseshoe: Has the strategic regional vision been compromised?*
http://www.neptis.org/sites/default/files/growth_plan_2013/theneptisgrowthplanreport_final.pdf