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November 22, 2012

Darryl Lyons, Team Lead  
Provincial Policy Statement Review  
Ministry of Municipal Affairs and Housing  
Local Government and Planning Policy Division  
Provincial Planning Policy Branch  
777 Bay Street, Floor 14  
Toronto, Ontario M5G 2E5

Dear Mr. Lyons,

**RE: Environmental Bill of Rights (EBR) Registry Number 011-7070  
Provincial Policy Statement Five Year Review: Draft Policies and the Review Cycle**

Thank you for the opportunity to respond to the draft policies and review cycle of the Provincial Policy Statement and share the Ontario Farmland Trust's unique perspective as part of this important review process. We are very grateful for the extensive consultation the Ministry of Municipal Affairs and Housing has led since the review began in 2010, ensuring all stakeholders' interests, recommendations and concerns are considered as part of the process. This fall, sharing the track-changes version of the draft policies and hosting public workshops to explain these changes has been very welcome. This outreach has a critical element of openness and transparency to it, and makes the policy review process very accessible. We applaud your commitment to this comprehensive review and active engagement of a wide range of stakeholders to improve Ontario's land use planning system.

The Ontario Farmland Trust is the only province-wide organization in Ontario (government or non-government) specifically dedicated to farmland protection and therefore has a unique role to play in the advancement of policy relating to farmland conservation and farm viability. Our Board of Directors includes stakeholders from the conservation and agricultural sectors, as well as planners and academics. The Farmland Trust recognizes that the protection of much of Ontario's farmland depends largely on land use planning policies, and we support the province's efforts to strengthen the protection of agricultural land through the PPS.

Protection of prime farmland resources must continue to be a matter of strong provincial interest. Ontario farmland is a strategic provincial resource and the single most important agricultural

resource in Canada, producing a greater diversity of crops than anywhere else in the country - over 200 different commodities. This rich farmland and diversity of production provide the foundation for the largest sector of Ontario's economy, with agriculture and agri-food industries contributing over \$30 billion annually. Yet, only 5% of Ontario's land is considered prime farmland with soils capable of supporting farm production, the majority of this land located within or adjacent to the province's major settlement areas in Southern Ontario.

The ongoing loss of tens of thousands of acres of Ontario's most productive farmlands every year to urbanization, aggregate extraction and other non-farm uses undermines our local and provincial economies by removing a perpetual resource capable of producing food forever and sustaining Ontario's largest industry. We need to recognize Ontario farmland as the strategic resource it is, and ensure all policy is designed to mitigate the loss of this valuable resource and support the long-term viability of farming communities.

By strengthening language in the PPS related to agricultural land protection, and improving provincial support mechanisms for the protection of prime farmland and prime agricultural areas, the policy guidelines established by the PPS can become more effective in directing inappropriate non-farm development away from Ontario's most productive agricultural soil resources.

Enclosed you will find the Farmland Trust's comments and recommended changes to the draft PPS policies, with a focus on policies related to the protection of farmland and agriculture. Our response is organized as a response to the five questions posed by Ministry of Municipal Affairs and Housing on the website and EBR listing.

We invite discussion and welcome any questions you might have regarding our submission. Thank you again for this opportunity to make comments on the draft PPS, and for considering our unique insights on provincial farmland protection policies during this review process.

Sincerely,

Norman Ragetlie, Chair  
Board Members, Ontario Farmland Trust

## ***1. Do the draft policies provide sufficient direction to effectively protect provincial interests in land use planning?***

In regard to improving the protection of prime agricultural areas, prime agricultural lands and specialty crop areas as a major provincial interest, there have been several positive changes in this draft PPS that encourage promotion of local agriculture, greater consideration of the impacts of non-farm development on agriculture, and additional planning protections for prime farmlands.

There are some areas within the PPS, however, where policy should be improved further to ensure farmland resources receive the highest level of protection possible. Section 2.5, Mineral Aggregate Resources, for example, while protecting the provincial interest in aggregate resources, does not adequately protect agricultural resources when aggregate extraction is proposed in prime agricultural areas. Greater consideration must be given to the short and long-term impacts on farming communities and the permanent loss of strategic farmland resources in this scenario, rather than aggregate extraction receiving notably higher priority over other provincial interests.

Improvements that we see in the draft PPS and outstanding concerns of the Ontario Farmland Trust follow, referencing specific sections within the policy and offering recommendations to maintain and enhance the protection of farmland and agriculture in the final PPS document.

### **Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns (1.1)**

In Section 1.1.1, “Healthy, liveable and safe communities are sustained by,” the Farmland Trust, and many of our urban and rural partners, feel strongly that an additional item should be added to this list that recognizes the importance of local food and agriculture as part of healthy communities. This may be in the form of ensuring access to local, healthy food; supporting community gardens and urban agriculture; and promoting development and land use patterns that protect and encourage farming activities.

### **Settlement Areas (1.1.3)**

See comments below in response to question 4 about additional supporting material needed provide clarity and direction to planning authorities, and to effectively implement settlement area policies.

The addition of Policy 1.1.3.8.d is good. It is important to reference the minimum distance separation formulae and ensure new or expanding settlement areas meet compliance and do not encumber nearby, existing farming operations.

### **Employment (1.3)**

The addition of 1.3.1.c., “encouraging compact, mixed-use development that incorporates compatible employment uses,” is excellent. This will help to reduce demands on transportation infrastructure and the need for new infrastructure, as people live closer to their workplace and spend less time commuting. More compact development in employment areas will also result in more efficient use of land and reduce the need for settlement area expansion into agricultural areas.

### **Infrastructure and Public Service Facilities (1.6)**

In policy 1.6.6, Transportation Systems, optimization of current transportation infrastructure should be prioritized before considering new infrastructure construction; new infrastructure

should only be considered after all other ways to accommodate projected needs are exhausted. Transportation in Ontario should not be modeled around an ever-increasing network of highway corridors. Instead, alternative, more efficient forms of mass transportation should be promoted. Fragmentation of farming communities and prime agricultural areas must be a primary consideration when new transportation infrastructure is proposed at a local, regional or provincial scale.

To adequately address these concerns and ensure good planning for future transportation infrastructure, the Farmland Trust recommends amending policy 1.6.6.1, using the word “shall” to read: “Transportation systems shall be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.”

1.6.6.2 should also be amended to prioritize the efficient use of existing infrastructure over the use of new infrastructure. This is particularly relevant in regard to new highway development. It should be recognized that traffic congestion stems from sprawl-type developments, which tend to cluster around new highways, thereby reducing the ability of highways to achieve their function of improved goods movement. This also relates to section 1.6.7.3.

Given that many transportation corridors run through agricultural areas, the new paragraph added to 1.6.7.3, addressing new development adjacent to existing or planned transportation corridors, should in no way hinder normal farm activities or agricultural development in these areas. Agricultural land uses adjacent to transportation corridors would very rarely have a negative impact on a transportation corridor’s function, however there is the potential for the policy to be interpreted as new agricultural developments being required to be directly “supportive of” the purposes of the corridor, which need not be the case for such farm developments. To avoid confusion among planning authorities, the language should be clarified to ensure farming activities and associated agricultural development over time will continue to be permitted adjacent to transportation corridors.

### **Energy Supply (1.6.10) & Energy Conservation (1.8)**

There is ongoing concern at the Farmland Trust and within the larger Ontario farming community about the misuse of prime agricultural land for large-scale, ground-based solar power generation. This is a land use issue - such large-scale solar developments should be directed to appropriate sites by the PPS and effective land use policy, rather than by Ministerial Directive. In general, solar power generation is best suited on the roofs of buildings within urban boundaries where they are closest to the demand for electricity. There should be no larger-scale, ground-based solar ‘farms’ permitted in any prime agricultural areas.

We have concern that the reference to “minimizing impacts on agricultural operations” of section 1.8.3 has been completely removed. Whether appearing in the new section 1.6.10, or being reinstated in 1.8.3, it is important to improve the PPS policy regarding the siting of new renewable energy systems to reflect the need for additional land use consideration and clarification, rather than making this component more ambiguous.

### **Long-Term Economic Prosperity (1.7)**

The changes to 1.7.1.i, “providing opportunities to support local food, and promoting the sustainability of agri-food and agri-product businesses by protecting agricultural resources and minimizing land use conflicts,” are very good. It is important to recognize the many contributions and far-reaching impact of local food, agriculture and supporting farm businesses on Ontario’s economy, and how fundamental this farm and food sector is to our long-term economic prosperity.

## **Natural Heritage (2.1)**

Policy 2.1.9 reads “nothing in policy 2.1 is intended to limit the ability of existing agricultural uses to continue.” The word “existing” in this policy has led to confusion when planners are faced with instances where the nature of a farm operation has changed, from livestock to row crops or fruits and vegetables for example. Owners of lands that are designated for agricultural use should be afforded the opportunity to use their land for any and all agricultural activities, with the minimum of restrictions. “Existing” should be removed, and “agricultural uses” italicized to reference the definition in section 6.0. This removes ambiguity and ensures farmers will continue to be able to respond to market signals and demands as their farm businesses evolve over time, without the worry of planning authorities imposing constraints because they cannot determine if “existing” applies.

One improvement in this section is policy 2.1.3, which recognizing that planning for natural heritage systems will vary in settlement areas, rural areas and agricultural areas.

## **Agriculture (2.3)**

There have been a number of good changes to this section that give additional support for farmland protection, and the Farmland Trust recommends the following be adopted and become part of the final PPS:

- The additional language in 2.3.1, acknowledging the importance of protecting Class 4-7 soils associated with prime agricultural areas, in addition to specialty crop areas and soil Classes 1-3;
- Requiring planning authorities to designate prime agricultural areas, as well as specialty crop areas, in 2.3.2. This is a great improvement. See comments below in response to question 4 about additional supporting material needed to support implementation of this policy;
- The additional clarity in 2.3.4.1.c.1 on the minimum lot size for surplus residential lot creation in agricultural areas due to farm consolidation;
- Reference to the minimum distance separation formulae in 2.3.5.1.c.2, as well as the restructuring of 2.3.5.1.c.4; and
- The change of word choice in 2.3.5.2 from “should be” to “are to be.”

Changes to the definition of specialty crop areas in section 6.0 are also very good.

## **Mineral Aggregate Resources (2.5)**

Ontario’s prime agricultural land must be protected for long-term agricultural production alongside protection of aggregate deposits. Unfortunately, the draft PPS makes aggregate a priority over all other land uses. Policy 2.5, rather than being encouraged to be read alongside the rest of the PPS, is largely treated in isolation from other policies. This is contrary to the PPS vision that encourages integrated planning that incorporates such values as sustainable and resilient communities, human health and Ontario-grown food. Planning for aggregate and agricultural land uses needs to be better integrated and coordinated, with an awareness that some areas of the province are best suited for agriculture, and that it is entirely appropriate to limit or prohibit aggregate extraction in these areas, particularly in prime agricultural areas of central and southwestern Ontario.

The change to 2.5.1 requiring that planning authorities identify deposits of mineral aggregate resources should only be included if a more comprehensive and balanced provincial strategy for the protection of both aggregate and agricultural resources is prepared in consultation with municipalities and community stakeholders. This would indicate clearly where long-term aggregate

and agricultural reserves should be strategically located and protected for their respective uses, given that protection of both resources is necessary to support the long-term stability and growth of Ontario's economy. See question 4 for additional comments on the creation of a more detailed aggregates and agriculture strategy as new support material, providing more guidance on how to effectively balance the protection of these two important provincial interests.

Section 2.5.2.1 is the source of much of the conflict over the siting of aggregate pits and quarries in Ontario. The "close to market" requirement in many cases directs aggregate activities directly into Ontario's most fertile agricultural areas. Major settlement areas in Ontario are located within or adjacent to rich farmlands, having historically relied on these lands for food. These cities and towns create demand for aggregates, but sourcing aggregate material close to this market does not always make sense, particularly if aggregate developments are pursued at the expense of farmland and local food production.

Blanket approvals for new aggregate sites because of this "close to market" provision is short-sighted and fails to effectively evaluate impacts on rural and agricultural communities. Fragmentation of the farming landbase and permanent loss of farmland resources can disrupt and displace these communities, undermine the long-term viability of local and provincial economies and remove the ability for local food production, which is a critical component of healthy communities. Policy 2.5.4.1.c. lays out the principle of evaluating alternatives to ensure aggregate extraction is directed toward lower-quality Class 4-7 agricultural soils, rather than Class 1-3 soils or specialty crop areas, however, this is often contradicted with the 2.5.2.1 requirement to locate aggregate sites as close to market as possible, where we also find many of our best farmlands.

A more holistic approach is needed to quantify and assess the above-mentioned impacts before approval of new aggregate extraction sites is granted. Again, there is a need for balancing the protection of agricultural and aggregate resources, and improve language in the PPS that acknowledges there are certain areas of the province that are best suited for agriculture and where aggregate extraction should be limited or prohibited to avoid permanent loss of Ontario's irreplaceable prime farmland resources. For these reasons, the "close to market" requirement for aggregate extraction should be removed from the PPS, and planning authorities be directed to seek alternatives that direct new aggregate extraction sites to locate outside of prime agricultural areas.

There is also ongoing concern that there remains no requirement that aggregate proponents demonstrate need for aggregate resources when seeking approval for development of new extraction sites (policy 2.5.2.1). This encourages licensing and approval of new pits and quarries where the materials are unneeded and results in the unnecessary loss of prime farmland and disruption of rural and agricultural communities.

Changes to policy 2.5.2.3, requiring conservation, recycling and reuse of mineral aggregate resources is a great step forward, and if fully implemented should reduce the need for new aggregate sites and mining of virgin aggregate resources. This reinforces the importance of requiring aggregate proponents to demonstrate the need for new pits and quarries. Conservation of aggregate resources should be clearly prioritized over the creation of new aggregate extraction sites.

Regarding extraction in prime agricultural areas, policy 2.5.4.1, parts c and d, do not fit well under requirements for agricultural rehabilitation, as they discuss site selection more directly rather than rehabilitation. Parts c and d, therefore, should be taken out of this list and moved above. There are implementation challenges associated with section 2.5.4, and a need for additional supporting

materials related to selecting new aggregate sites and ensuring complete agricultural rehabilitation. See the response to question 4 below for more recommendations.

There has been some marginal improvement to 2.5.4.1, providing new protections for specialty crop areas from extraction of tertiary aggregate material, but the Farmland Trust does not feel this policy change adequately recognizes the value and strategic importance of specialty crop areas in Ontario. These areas contain significant investment in farm infrastructure, and the best soils and climate for growing unique tender fruit, grape, vegetable and greenhouse crops that can't be grown elsewhere in Canada. Specialty crop areas are to receive the highest level of policy protection, and yet aggregate extraction is still permitted in 2.5.4.1. While it is understood that clarification is needed on the designation and current boundaries of specialty crop areas (see comments in question 4 below), policy 2.5.4.1 needs to be improved to ensure specialty crop areas are fully protected by prohibiting aggregate extraction in these areas, as is the condition for all other types of non-farm development.

The Farmland Trust, alongside many of our farm, conservation, urban and rural partners, believes strongly that there should be no new aggregate extraction permitted on prime farmlands or in any prime agricultural areas. We realize, however, that there would be significant challenges to implementing such a large change as part of this policy review without, for example, substantial investments in alternative transportation infrastructure required to move aggregate materials over greater distances to serve communities in southern Ontario that are located in agricultural areas. Alternative means to protect prime farmlands must be explored further where aggregate materials are present in agricultural areas, and additional changes can be made to section 2.5.4 to improve protection and rehabilitation of these farmland resources.

In addition to prohibiting aggregate extraction in specialty crop areas, below water table extraction should be prohibited on all Class 1-3 farmlands and in prime agricultural areas, as this makes rehabilitation back to agriculture impossible and permanently removes farmland from production. Where aggregate sites are created in prime agricultural areas, the land must be rehabilitated so that substantially the same acreage and soil capability for agriculture as had been present before extraction is restored. In the very least, only permit extraction of "high quality" aggregate materials from within prime agricultural areas, as proposed for specialty crop areas in this draft PPS.

There is a strong assumption in 2.5.4 that aggregate extraction sites in prime agricultural areas will be rehabilitated to agriculture and the same average soil capability for farming can be restored. Unfortunately thousands of aggregate pits and quarries in Ontario have been abandoned in agricultural areas without being rehabilitated, or rehabilitation is being delayed for decades because of the open-ended nature of aggregate licenses. This long-term disruption of farming communities weakens or permanently damages the social fabric of these communities and local agricultural economies, and must be corrected. To ensure aggregate extraction in prime agricultural areas is indeed an "interim use," the province needs to do more to enforce compliance and work with the aggregate industry to see sites rehabilitated in a timely manner. This also requires changes to the Aggregate Resources Act. See question 4 below for more recommendations on supporting materials.

## ***2. Are there additional land use planning matters that require provincial policy direction and which are not included?***

Given some of the challenges associated with planning for agriculture and effectively protecting farmland resources in urbanizing areas, parts of the province where aggregate extraction is undermining the viability of farming communities, and other areas facing non-farm development pressures, the Farmland Trust recommends a new way of thinking about Ontario agriculture – by adopting a systems approach to planning for the long-term health and sustainability of these communities.

The ‘systems’ language is already used in multiple contexts within the PPS, particularly with natural heritage and transportation, and similar language would lead to a better understanding of the uniqueness and complexity of the agriculture sector and its land requirements among planning authorities and other agencies using the PPS.

Not only are natural heritage and transportation systems in southern Ontario required to be identified through the PPS, but connectivity is prioritized to maintain, restore and improve function of these respective systems. This ‘systems’ way of thinking is easily understood, and would apply equally well to agricultural areas. Planning for the stability, enhancement and renewal of complete agricultural systems, and recognizing the importance of connectivity and linkages among and between agricultural and rural areas and across municipal boundaries where farming activities are occurring, would go a long way to strengthening the sustainability of Ontario’s food and farming industries.

The PPS defines “natural heritage systems,” as well as “ecological function.” While there are definitions for agricultural uses in the PPS, there is no direct reference to broader agricultural systems or the function or importance of agricultural areas. Even rural areas, in section 1.1.4, now have an introduction that speaks to the function of these areas. Now that agricultural areas are required to be designated by planning authorities in the draft PPS, an introduction of the function of these areas, either in the definitions section or upfront in section 2.3, is warranted.

Considering development proposals through an agricultural systems lens, and within the broader function of agricultural areas, planning authorities would be able to make decisions based on a more comprehensive evaluation of impacts on the broader agricultural landscape and farming communities. Farms do not remain viable when isolated from a larger farming community. Farming does not remain viable when agricultural landscapes are fragmented by non-farm developments. A strong agricultural industry requires a contiguous, protected landbase with few conflicting land uses, the ability to move farm equipment from place to place and significant investment in local infrastructure (eg. field drainage systems). Agriculture thrives when there is a critical mass of farming activities in an area and clustering of farm services and supporting businesses. The cumulative impact of planning decisions and development approvals can strengthen or weaken farming communities and the long-term sustainability of agriculture. A systems approach emphasized within the PPS would bring a better understanding to the function of agricultural areas and ultimately help protect important farming resources across the province.

### ***3. Do you foresee any implementation challenges with the draft policies?***

Most implementation challenges associated with farmland protection can be addressed with the development of additional support materials, as indicated in the response to question 4.

One implementation challenge we see, however, is the effective rehabilitation of aggregate extraction sites in prime agricultural areas back to the same average soil capability for agriculture, and in specialty crop areas, rehabilitation of soil and microclimate to a condition which allows for the same range and productivity of specialty crops. There is uncertainty about whether complete agricultural rehabilitation this is possible, as there is a lack of research and precedence in the province that suggests this is feasible, and questions about how to best measure the effectiveness of rehabilitation efforts. In the absence of better research, it becomes even more important that specialty crop areas and prime agricultural lands be protected from aggregate extraction, and efforts to restore farmland on sites that have been disturbed for aggregate uses are pursued, documented and monitored.

### ***4. Is additional support material needed to help implement the Provincial Policy Statement?***

#### **Settlement Areas (1.1.3)**

The Farmland Trust agrees with policies promoting efficient use of land resources through intensification, redevelopment and compact form within settlement areas. Not only is this fiscally responsible, but protects farmlands adjacent to settlement areas by reducing urban and rural sprawl into agricultural areas. Although the PPS requires that municipalities set targets for intensification and redevelopment (1.1.3.5), performance related to these targets and implementation is not monitored. There is a need for timely evaluation and adaptive management to optimize the effectiveness of this policy. The Farmland Trust encourages the province to develop measurable targets and require municipal reporting regarding how municipalities are achieving consistency with the PPS, recognizing and taking into account regional differences and the unique sustainability challenges of urban and rural communities.

In Section 1.1.3.8, parts c.2.i, c.2.ii, and e, the words “no reasonable alternatives” and “mitigated to the extent feasible” give planning authorities considerable discretion when faced with expanding a settlement area boundary onto prime agricultural land. Additional guidance material and clarification from the province would be very welcome in this regard to help municipalities evaluate the need for a settlement area expansion, effectively assess alternative locations, and fully understand impact on agricultural operations and mitigation options available. “Mitigated to the extent feasible” appears again in section 2.3.5.2, and similar guidance materials are needed.

#### **Rural Areas in Municipalities (1.1.4)**

Additional clarification is still needed in sections 1.1.4.1 and 1.1.4.4 with reference to “limited residential development” and “development that is compatible with the rural landscape,” respectively. For example, if 51% of a municipality’s development occurred in settlement areas, would the remainder in rural areas be considered limited? “Development that is compatible with the rural landscape” is open to varying interpretations, and there is concern that this policy may encourage an idealized view of rural and agricultural areas and will frustrate technological and economic changes taking place in these areas that are necessary for sustainable economic

development. Supporting materials could help address these concerns, or a change to the PPS language, such as “development that is compatible with the multifunctional role of natural and agricultural features in rural landscapes shall be promoted.”

### **Agriculture (2.3)**

Policy 2.3.2 states: “Planning authorities shall designate prime agricultural areas and specialty crop areas in accordance with guidelines developed by the Province, as amended from time to time.” There are currently no provincial guidelines for designating prime agricultural areas or specialty crop areas, and municipal planning authorities need additional direction and support to ensure they are adequately protecting these areas. Specialty crop areas of local and provincial interest are currently not even identified in mapping.

The province needs to develop evaluation procedures for designation of both prime agricultural areas and specialty crop areas to effectively safeguard unique agricultural land resources of provincial interest. The province should also work with communities to determine exact locations and boundaries of existing specialty crop areas, and create a process by which municipalities and community organizations can apply for specialty crop area status.

### **Mineral Aggregate Resources (2.5)**

A more comprehensive aggregate strategy is needed for the province, which will give greater certainty in future land use to aggregate operators, agricultural operators and rural communities. Such a strategy would identify where long-term aggregate and agricultural reserves should be strategically located and protected for their respective uses. It would also effectively analyze and mitigate impacts on host communities, differentiate between different types of aggregate materials and link production to the need for these materials. Development of such a strategy should be transparent and include meaningful consultation with municipalities and community stakeholders. The first step would be conducting a thorough analysis of the State of the Agricultural Soil Resource in Ontario, led by the Ministry of Agriculture, Food and Rural Affairs, similar to the Ministry of Natural Resources’ 2010 State of the Aggregate Resource in Ontario report. This would provide a strong basis for understanding how to balance the use of Ontario’s two primary, strategic resources: farmland and aggregate. It would also generate a better understanding of the long-term social and economic costs to the Province and local communities when farmland and associated farm supply businesses and services are displaced by aggregate operations.

To fully achieve and implement the PPS principles and policies in section 2.5.4 for the rehabilitation of aggregate pits and quarries in agricultural areas, improvements are also needed within the Aggregate Resources Act (ARA). The PPS and ARA need to be complementary and work toward the same objectives, so that land use decisions and the licensing of aggregate operations are mutually supportive. For example, the ARA needs to be strengthened to require aggregate operators to surrender their license in a timely manner following extraction to expedite rehabilitation of the site back to agricultural use (eg. place expiration dates on licenses and requiring demonstration of need in requests for extensions). Aggregate license and royalty fees should also be increased through the ARA to support improved monitoring of aggregate sites; programs and incentives that encourage reuse and recycling of aggregate material; and new incentives or mechanisms for rehabilitation of aggregate sites following extraction. In addition, as part of the licensing process, the ARA could require aggregate applications conduct full agricultural impact studies for aggregate sites proposed in agricultural areas and demonstrate no negative impact on local farming. This could include full assessments of agricultural soils, types of agricultural production, fragmentation of the agricultural

landscape, local agricultural infrastructure and interference with farming activities in the area, as well as rehabilitation plans.

### **PPS Performance Monitoring Indicators**

Performance indicators for monitoring PPS compliance and effectiveness of Ontario's land use policies need to be developed further. Currently, the proposed performance indicator for the effectiveness of the PPS policies related to farmland protection is the 'change in farmland area' over each five year period associated with the Census of Agriculture. Unfortunately, this is very high-level data and will not provide substantial insight into the effect of the policy on-the-ground. We need a better measure of farmland loss and farmland protection at the municipal level across Ontario; more regular and detailed reporting or data collection is required. The province should develop a means to gather such information and would then be able to directly monitor the direct results of policy changes and improvements over time.

### ***5. Do you think that the legislated Provincial Policy Statement review cycle should be extended from the current five-year period?***

The Planning Act should not be amended to extend the current five-year review period for the PPS. Just since 2005, there have been so many new realities to take into consideration as necessary changes and updates are being made (eg. Introduction of necessary climate change language in this PPS draft, directing municipalities to proactively plan to address impacts and mitigate risk). We are also finding the review process may take three years or more, which means the policy updates don't actually come into effect until eight years from the start of the review. To extend the review period beyond five years would be too long and reduce the flexibility to adapt to new realities that require additional changes. The province could provide more support to municipalities that may find it challenging to update local planning documents in a timely manner to meet conformity with new or updated PPS policies.