



June 15th, 2018

Ministry of Municipal Affairs
Partnerships and Consultation Branch
777 Bay Street
c/o Business Management Division, 17th Floor
Toronto, ON
M5G 1Z3

RE: EBR Registry # 013-2359 for input on the two draft technical guidance documents designed to help municipalities carry out municipal comprehensive reviews and meet Growth Plan, 2017 intensification and density targets:

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Thank you for the opportunity to submit feedback on the two draft guidance documents to support implementation of the Growth Plan, 2017. OFT appreciates the Ministry's dedication to responsible and sustainable growth within the Greater Golden Horseshoe (GGH) and their foresight to prepare for extended planning horizons. OFT has played an active stakeholder role in the development of the Growth Plan and the Agricultural Systems elements and is pleased to continue to work with the Province to strengthen the implementation of these provincial policies.

OFT applauds the Ministry's work on both draft guidance documents. The language used is clear and both documents are successfully grounded in the Growth Plans policies and objectives. OFT also commends the Ministry's efforts to increase density and intensification targets, which is a strong step towards farmland preservation. The long-term protection of Ontario's limited farmland is critical for the ongoing viability of the Agricultural System and these documents will make substantive gains in bringing this to the fore of municipal planning discussions within the GGH. OFT believes this consultation is an important step towards strengthening the draft documents and providing municipalities the best possible guidance for successful Growth Plan implementation.

The Draft Guidance Documents are promising tools to direct the successful implementation of the Growth Plan, 2017. Below, OFT has amassed several recommendations to strengthen the guidance within the Municipal Comprehensive Review (MCR) Process document and the Intensification and Density Targets document. These recommendations have been sorted into the following themes: settlement area boundary expansion, the Agricultural System, and density and intensification target alternatives.



Settlement Area Boundary Expansion

OFT would like to compliment the Ministry's clearly outlined criteria and eligibility for settlement area boundary expansions. The inclusion of the Agricultural System within the considerations indicates a strong commitment to the longevity of a thriving agri-food sector. However, we 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 (Neptis Foundation, 2013). 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.

- 1) OFT recommends that additional language be included to discourage applications for settlement area boundary expansions.** Firm settlement area boundaries are absolutely necessary for effective farmland protection and to achieve sustainable growth.
- 2) OFT recommends using stronger language to discourage settlement boundary expansions within the Greenbelt in section 3.5.2.** Towns/villages in the Greenbelt area should not be the focus of growth for any urban structure. To maintain the integrity of the Greenbelt Plan, growth must be located outside of the Greenbelt area. OFT strongly discourages the re-designation or fragmentation of prime agricultural areas within the Greenbelt, Oak Ridges Moraine, and Niagara Escarpment plan areas.

The Agricultural System

OFT would like to, once again, commend the Ministry for its extensive work to establish the Agricultural System and related elements. Acknowledging the many facets and dimensions of this industry is an important and necessary step towards ensuring its long-term viability.

- 3) OFT recommends that the Agricultural System and the related implementation document should be introduced, in brief, earlier in Section 3 of the MCR Process document.** Providing greater description of the systems approach and its value to the viability of the agri-food sector earlier in the document will provide important context for decision making. It is critical that the many elements of the Agricultural System are considered at all steps throughout the MCR process.



Density & Intensification Target Alternatives

OFT would like to commend the Ministry's efforts to set effective and achievable density and intensification targets for the Growth Plan's planning horizon. Meeting these targets will make considerable gains towards preventing urban sprawl and protecting Ontario's critical natural infrastructure, including its farmland and Agricultural System. We believe that Growth Plan policies' flexibility is capable of accommodating the needs and context for all of the municipalities within the GGH and, as a result, there is little to no need for alternative targets. The application of alternative targets erodes the integrity of the Growth Plan and runs counter to its intent and objectives. All density and intensification targets must be mandatory for and adhered to by all municipalities or they become effectively meaningless.

OFT also applauds the encouragement and direction provided to achieve density targets within existing DGA. The acknowledgement of differing stages of DGA development is an excellent step towards bringing a diverse range of municipalities into conformity with the Growth Plan. However, more can be done to ensure that those municipalities with partially built out DGAs are encouraged to achieve density targets and discouraged from applying for alternative targets or settlement boundary expansion. Additionally, vague language regarding circumstances that require alternative intensification and DGA density targets could be misinterpreted as an opportunity to continue with business-as-usual. This approach runs counter to the goals and objectives of the Growth Plan. More specifically, a business-as-usual scenario continues to put farmland at risk due to the outwards expansion of settlement areas. This risk is unacceptable for the longevity and viability of Ontario's Agricultural System.

4) OFT recommends that additional language be introduced into the Intensification and Density Targets document and the MCR Process document that reiterates the importance of Growth Plan prescribed density and intensification targets and discourages applications for alternative targets.

5) OFT recommends that, in section 4.1.1 of the MCR Process document, greater clarification be provided regarding the supporting evidence or documentation that should be provided to the Minister. Again, we would reiterate that the targets provided for in the Growth Plan are achievable and appropriate for all municipalities within the GGH and alternatives should be discouraged.

6) OFT recommends that language in the Intensification and Density Targets document be altered to encourage the exploration of all options to achieve the Provincially prescribed density and intensification targets. Section 2.2, paragraph 3 is one specific area for improvement.



7) **OFT recommends that additional direction and description be provided for “Areas that are partially built out” in the Intensification and Density Targets document, section 3.4.2.** As noted within the preamble for this section, potential opportunities for these areas exist around “redevelopment on underutilized or vacant lots, infill development, or expansion/conversion of existing buildings.” **These areas should also be encouraged to plan for greater density as development progresses,** particularly in anticipation of broader planning horizons and the higher required densities in new DGA.

8) **OFT recommends that additional clarification be provided in the Intensification and Density Targets document, sections 3.5.2 and 4.5.2.** Specifically, more clarity is required for the following statement: **“why additional actions that could be considered are not appropriate for achieving the applicable density [intensification] target,”** and in what circumstances this is an appropriate rationale for requesting an **alternative target.** To achieve the objectives of the Growth Plan’s intensification and density targets, all additional actions should be seriously considered.

Thank you for this opportunity to share our recommendations and feedback on the proposed recommendations to EBR Registry # 013-2359. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further to strengthen these guidance documents for the Growth Plan, 2017.

Most Sincerely,

Kathryn Enders
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Ontario Farmland Trust