



October 24, 2016

Cindy Tan, Manager
Land Use Planning Review
Ministry of Municipal Affairs
Ontario Growth Secretariat
777 Bay Street, Suite 425 (4th floor)
Toronto, ON M5G 2E5

Dear Ms. Tan,

RE: The Coordinated Land Use Planning Review

**Proposed Growth Plan for the Greater Golden Horseshoe (2016), EBR Registry #012-7194;
Proposed Greenbelt Plan (2016), EBR Registry #012-7195;
Proposed Oak Ridges Moraine Conservation Plan (2016), EBR Registry #012-7197;
Proposed Niagara Escarpment Plan (2016), EBR Registry #012-7228; and
Proposed Amendment to the Greenbelt Area Boundary Regulation, EBR Registry #012-7198.**

Thank you for the opportunity to provide feedback on the proposed changes to the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan as part of the Co-ordinated Land Use Planning Review process. The Ontario Farmland Trust (OFT) is grateful to the Province and the Ministry of Municipal Affairs for your commitment to a transparent, inclusive and accessible stakeholder engagement process that is responsive to community concerns and seeks to address challenges of urban growth management and resource protection with strong leadership, meaningful policy direction and a spirit of collaboration.

Amid ongoing population growth and unsustainable urban expansion, climate change impacts and uncertainties, rapid depletion of our agricultural land resources and disruption of local food systems in the Greater Golden Horseshoe (GGH), coordinated planning, policy, program and partnership development is needed more than ever. All of us, government leaders and non-government stakeholders, need to work together to build healthy, sustainable communities and coordinate planning across the region to effectively manage growth and preserve our farmland, water and natural resources that are increasingly under threat by private land development interests.

The Plans and their implementation must be strong and applied consistently across the GGH to protect and uphold the public good, and remain committed to planning for environmental protection and the long-term economic prosperity of our urban, rural and agricultural communities. Those planning policies and decisions that uphold the broader public interest must be defended diligently by the Province and municipalities; development approvals that preferentially enrich developers, exempt municipalities or developers from meeting growth density or intensification targets, and remove land from protected areas are unacceptable - they undermine the public trust in the Plans, reverse progress, and make policy adherence and implementation more difficult.

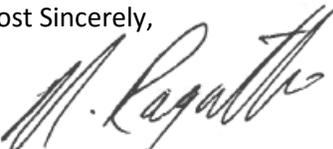
We commend the Province's efforts to look beyond updates to the GGH land use plans by also leading reviews and making improvements to other complementary policies and initiatives that support implementation of growth planning and land preservation objectives, understanding the dynamic relationship between land use policy and the fiscal tools, guidelines, programming, education and grassroots collaboration that have to work in tandem to deliver effective results. We commend the Province's leadership and inter-ministerial coordination surrounding additional consultations, and the development and improvement of the Ontario Municipal Board, Land Use Planning & Appeals System, Development Charges Act, Smart Growth for our Communities Act, Aggregate Resources Act, Excess Soil Management Policy, Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas, Agricultural Soil Health & Conservation Strategy, Ontario's Climate Change Strategy & Action Plan, and the Farms Forever program. Provincial land use plans cannot be treated in isolation; it is encouraging to see the Province leading such a comprehensive approach to building complete communities and conserving land resources that will have a positive, lasting impact on quality of life in the GGH and beyond.

Attached, you will find comments and recommendations from OFT that highlight and address policy gaps and improvements needed for fulfillment of the policy objectives and effective implementation of the Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan and Growth Plan for the Greater Golden Horseshoe, as well as support for several new directions presented in the proposed changes to the four Plans.

OFT is the only province-wide organization with a mandate and mission that is dedicated to advancing the permanent protection of farmland and agriculture in Ontario, and therefore can offer a unique perspective as part of provincial land use planning and policy development. We work with farmers and community partners, including municipalities and conservation organizations, to permanently protect farmland by facilitating farmland easement agreements and land donations. OFT also supports farmland policy research and leads educational events, such as the annual Ontario Farmland Forum, that engage hundreds of planning practitioners, municipal leaders, farmers and other community stakeholders in information exchange, learning, debate and discussion. Such activities allow OFT to receive and synthesize information about the on-the-ground impact of current provincial policies. We hear stakeholder concerns, new ideas, challenges and opportunities that we can summarize, share and translate into grounded policy recommendations like those presented in the attached document. OFT's recommendations to government are vetted through our Policy Committee that includes primary producers, farm owners, professional planners, researchers, retired civil servants, members of Ontario's major farm organizations, and land conservation specialists.

Thank you again for the opportunity to share our recommendations and feedback on the proposed changes to the four land use Plans. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further to strengthen the protection of agricultural land resources and provide a secure future for our vibrant farming communities in the Greater Golden Horseshoe.

Most Sincerely,



Norman Ragetlie
Chair, Board of Directors

The Co-ordinated Land Use Planning Review: Necessary Improvements for Fulfillment of Policy Objectives & Effective Implementation

1. Addressing Policy Gaps

Recommendations for key improvements to the Plans and their implementation, where policy in the four Plans falls short in meeting growth management objectives and effectively protecting the countryside and farmland resources:

A Freeze Settlement Area Expansion & Establish Firm Urban Boundaries

With an excess of lands designated for future development, now is the time to freeze urban expansion and introduce permanent boundaries in all communities across the GGH to stop sprawl, manage growth effectively, and protect farmland resources and farming communities.

- Firm urban and rural settlement area boundaries must be established and maintained around all communities in the GGH, following existing settlement area boundaries.
- Settlement area boundaries are fundamental to effective growth management, yet the Growth Plan for the Greater Golden Horseshoe (Growth Plan) fails to introduce and enact long-term, fixed boundaries that are necessary to shift urbanization patterns away from the dominant ‘perpetual urban sprawl’ model of growth, and toward healthy, complete communities.
- 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: 264,650 acres, or 1.5 times the area of the City of Toronto, the majority of which is prime agricultural land (Neptis Foundation, 2013).
- Even in a sprawling, business-as-usual scenario there is enough developable land currently available; if municipalities meet intensification and density targets, the designated area is large enough to accommodate growth for many more years beyond 2041 (Neptis Foundation, 2015).
- Settlement area expansion within the next planning period would result in an unacceptable loss of agricultural land resources and irreparable damage to the agriculture and agri-food sector in the region, and would represent status quo urban sprawl that undermines the Province’s growth management objectives.
- Settlement area boundary expansion should only be considered in exceptional circumstances after 2041 based on the following:
 - The Province has completed identification and mapping of the GGH Agricultural System, and these maps and the Agricultural System designations have been incorporated into municipal Official Plans,

- Permanent boundaries are solidified and maintained where any settlement area expansion would encroach on Prime Agricultural Areas.
 - Growth Plan population and employment forecasts are updated following release of the 2016 Census results by Statistics Canada and not overinflated as they have been to date (see Recommendation 1.B),
 - A definitive and standardized methodology has been developed by the Province for undertaking municipal ‘land needs assessments’ to avoid creating an oversupply of land designated for urban uses (see Recommendation 1.B),
 - Municipalities have demonstrated their ability to achieve Growth Plan intensification and density targets, AND
 - The need for a settlement area boundary expansion has been justified with a ‘land needs assessment’ following application of the new methodology required by the Province and approved by the Province.
- The vast majority of Ontarians support the introduction of firm urban boundaries by the Province, as expressed repeatedly through the Coordinated Plan Review consultations. There is also strong agreement among farmers, other agricultural stakeholders, farm organizations, and land conservation organizations that firm urban boundaries in the GGH are essential to protecting Ontario’s farmlands and agricultural economy.
 - The Growth Plan clearly provides authority to implement firm urban growth boundaries in Section 5.2.2.

B

Introduce a Standard Method for Assessing Land Requirements

A standardized ‘Land Needs Assessment’ process is needed to correct inconsistencies in how municipalities calculate the amount of land they require to accommodate future growth.

- Establish a definitive target-based methodology for assessing land needs to accommodate growth and effectively reign in urban sprawl (Growth Plan Section 2.2.1.5.).
- Mandate that this standardized Land Needs Assessment method be uniformly adopted by all municipalities to consistently and accurately apply intensification and density targets and calculate the area needed for any settlement area boundary expansions (Growth Plan Section 2.2.8.).
- Correct and update population growth forecasts in Schedule 3 of the Growth Plan, for use in assessing land needs, by incorporating the 2016 Census data by Statistics Canada. There are significant discrepancies between Growth Plan forecasts and more accurate Ministry of Finance growth forecasts, with outer ring municipalities currently required to plan for net population growth that is 80% higher than Ministry of Finance projections. As a result 25% more land is being designated for urban uses than would be required if 2016 Ministry of Finance projections were used to reflect actual growth to 2041 (Greenbelt Foundation, 2016). The impact is unsustainable and excessive loss of farmland, land development, and infrastructure investment that is costly and unwarranted.

- The Growth Plan’s Land Needs Assessment process must require full compliance with municipal intensification and density targets and ensure that the entire capacity of the existing designated greenfield area is used within the planning period before a settlement area expansion is permitted.
- Prepare a definitive list of permitted ‘take-outs’ from the designated greenfield area density calculations and require that all municipalities follow the prescribed formula for clear, consistent implementation (Growth Plan Section 2.2.7.3.). Inappropriate take-outs like golf courses should not be allowed to artificially raise greenfield density numbers or be used to justify urban boundary expansion.
- Prohibit appeals to the Ontario Municipal Board associated with municipal Land Needs Assessments that use the mandated methodology and are approved by the Province.

C

Prohibit Exemptions to Density & Intensification Requirements

Do not permit municipalities to grow with development patterns that reflect lower intensification and greenfield density rates than the targets outlined in the Growth Plan.

- Clarify that the use of the term “will be planned to achieve” in the Growth Plan Sections 2.2.3.3. and 2.2.7.2. means that density targets for urban growth centres and designated greenfield areas are intended to be achieved within the planning period; they are not just inconsequential targets that can be disregarded.
- Eliminate Growth Plan policies 2.2.2.4 and 2.2.7.4 to close the loophole which allows for outer ring GGH municipalities to be exempted from density and intensification requirements.
- Over the past 10 years 60% of outer ring municipalities have received permission by the Province to build and maintain status quo low-density residential development with much lower intensification and greenfield density targets than those outlined in the Growth Plan (Neptis Foundation, 2013); this is resulting in significant loss of farmland resources and fragmentation of farming communities throughout the GGH.
- Adherence to the intensification and density targets outlined in the Growth Plan must be mandatory for all municipalities or they are meaningless. There need to be significant penalties that are triggered for any municipality that fails to achieve the Growth Plan targets.

D

Do Not Remove Lands from the Greenbelt

Removal of land from the Greenbelt Plan area undermines the Plan’s permanent land protection mandate and erodes public confidence in the provincial Plans and the Province’s commitment to effective planning for land conservation and growth management.

- Section 5.7 of the Greenbelt Plan must be upheld: “Amendments to the Plan shall not have the effect of reducing the total land area of the Greenbelt Plan.”
 - It is unclear whether the proposed amendment to the Greenbelt Plan area boundary regulation, EBR Registry #012-7198, is being pursued in accordance with Section 5.7 and whether it will result in a net gain or loss in the Greenbelt Plan area.

- OFT does not support any removal of land from the Greenbelt Plan area, as it directly contradicts and undermines the Greenbelt Plan’s purpose and policy mandate to “provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape” (Section 1.1).
- It is highly inappropriate for the Province to consider granting approval of any of the 650 requests from developers, land speculators, and municipalities seeking to remove land from the permanently protected Greenbelt. Much of the 27,000+ acres affected by these requests is productive food-producing land and sensitive ecosystems (Environmental Defence, 2016).
- Change Section 3.4.3.3 of the Greenbelt Plan to prohibit expansion of the settlement area boundaries of towns and villages within the Greenbelt Protected Countryside and the Agricultural System.
- Change Section 3.4.5.c. of the Greenbelt Plan to prohibit settlement area expansion into the Agricultural System and Prime Agricultural Areas, in addition to Specialty Crop Areas. The Agricultural System should receive the same level of protection that the Natural Heritage System receives in this same section, 3.4.5.b.

E

Grow the Greenbelt with Meaningful Stakeholder Consultation

Stronger, permanent policy protection is needed for ‘at risk’ agricultural, ecological and hydrological areas that are currently subject to development pressures. Growing the Greenbelt is one way to achieve this, but must be pursued in consultation with community stakeholders.

- The Greenbelt Plan is a unique policy that offers permanent protection for valuable farmlands and farming communities that would otherwise be under severe threat and subsumed by urban sprawl in the near future. Many lands just outside the Greenbelt Plan protected area are still vulnerable; farmers in these areas face a very uncertain future and many desire to be included in the Greenbelt so their families and neighbours can continue to farm.
- OFT supports a provincially-led process to grow the Greenbelt Plan area that proactively engages and involves multiple provincial ministries, municipal governments, farmers and agricultural organizations, environmental and conservation organizations, and other community stakeholders in visioning and planning for the expansion of this important protected area.
- The Province should set firm timelines for identifying, mapping, consulting and finalizing areas to grow the Greenbelt, with public consultations via the EBR Registry initiated in January 2017 and any Greenbelt expansion confirmed with amendments to the Greenbelt Boundary Regulation enacted by spring 2017 under the current government mandate.
- The Province should address “leapfrog” development pressure and discourage land development speculation by expanding the Greenbelt into the “whitebelt” and outer-ring municipalities of Simcoe County, Brant County, Waterloo Region, Wellington County and Niagara Region.
- Section 5.7.1.2. of the Greenbelt Plan focuses only on “areas of ecological and hydrological significance where urbanization should not occur.” The focus of Greenbelt expansion should be broadened to include areas of agricultural significance that will enhance the Agricultural

System. A Prime Agricultural Area or Agricultural System overlay would be helpful to the process of identifying potential Greenbelt expansion areas. Where agricultural, hydrological, natural heritage and urban pressure layers overlap there is a stronger case to be made for expanding the Greenbelt in these areas that protect multiple resources and values.

- Any Greenbelt expansion needs clear criteria and rationale for what lands are to be included, and this criteria communicated openly to landowners and other stakeholders.
- Greenbelt expansion is preferred over expansion of the Niagara Escarpment Plan area as a means to preserve farmland and support agriculture through land use planning in the GGH, given the Niagara Escarpment Commission’s reputation for discouraging agriculture with expensive, onerous and lengthy permitting and approvals processes.
 - Expansion of the NEP must be seen as different from expansion of the Greenbelt Plan, as the NEP introduces much more administrative burden and overarching powers through the Commission, vs. the Greenbelt as an easier-to-implement land use plan implemented in partnership with municipalities.
- The Niagara Escarpment Commission has proposed that 112,870 acres be added to the NEP, a significant increase of more than 23 percent of the current policy area. While the criteria used to identify lands for inclusion in the NEP is generally consistent with the conservation objectives of the Plan, much more landowner and community consultation is needed and a more in-depth analysis of the impact of these changes.
 - It is not clear how much agricultural land and how many farm businesses are affected by these additions. Before any inclusion of new lands, Agricultural Impact Assessments should be conducted to evaluate the potential negative outcomes for all farm properties affected.
 - An independent third party should be engaged to review and verify that each property listed for inclusion in the NEP does indeed meet the criteria from a scientific and conservation perspective, given few details from the Commission on their method of scoring and choosing the subject properties.

F

Support Agriculture in the Rouge National Urban Park

References to the Rouge Nation Urban Park Management Plan in the Greenbelt Plan need to be removed where agricultural land protection and natural heritage restoration objectives conflict.

- The prescriptive nature of the Rouge North Management Plan and 600 metre corridor referenced in Section 3.2.7 of the Greenbelt Plan is inappropriate and contrary to the goals of the Greenbelt to preserve farmland and support local agriculture. It has created difficulties for area farmers, directing more than 1,700 acres of prime farmland to be removed from agriculture and planted in trees. A better balance of agricultural and natural heritage restoration is articulated in the more recent Rouge National Urban Park Management Plan. This Plan, where applicable, supercedes the Rouge North Management Plan and should be accurately represented in the Greenbelt Plan.

G Prohibit Aggregate Extraction in Prime Agricultural Areas

The Plans must provide more restrictions on aggregate extraction operations locating or expanding in Prime Agricultural Areas.

- Prime Agriculture Areas are areas where agriculture is the predominant and desired land use, yet there are few protections for farmland and agriculture from aggregate extraction in each of the proposed Plans.
- Strengthen Greenbelt Section 4.3.2., Growth Plan Section 4.2.8., ORMCP Part IV Section 35 and NEP Section 2.9 to prohibit aggregate extraction, both new and expanding operations, in Prime Agricultural Areas, Specialty Crop Areas and Prime Agricultural Lands, including below-water-table extraction.
- Identify areas with unexploited high-potential aggregate resources, where Prime Agricultural Areas and Prime Agricultural Lands can be avoided and where extraction activities can be directed.
- There is much language and whole sections of each of the Plans that require mineral aggregate extraction operations to ‘protect and enhance’ Natural Heritage System and Water Resource System, but there no requirement for protection or rehabilitation of affected Prime Agricultural Areas or the Agricultural System. Rehabilitation of disturbed agricultural lands receives a brief mention in ORMCP Part IV Section 35, NEP Section 2.9.11 and Growth Plan Section 4.2.8.5, but this is insufficient on balance with the rehabilitation standards and expectations for natural heritage.
- There is total absence of language surrounding the rehabilitation of Prime Agricultural Lands in the Greenbelt Plan. Rehabilitation of aggregate sites in Prime Agricultural Areas and the Agricultural System to a state of equal or greater agricultural value than the original agricultural features and values must be required. It is concerning that there is no mention of rehabilitation of agricultural lands in Greenbelt Plan section 4.3.2.6 and that rehabilitation is only focused on restoration of sites to a state of equal or greater ecological value.

H Harmonize Approaches to Agricultural Planning, Terms & Definitions

Seeking to harmonize language between the Plans and the Provincial Policy Statement results in a more consistent approach planning for agriculture in the GGH and makes it easier for farmers to conduct business and navigate planning processes.

- Some improvements have been made in harmonizing language across all four Plans, such as inclusion of the terms: ‘on-farm diversified uses’, ‘agricultural-related uses’, and ‘on-farm diversified uses’.
- Many inconsistencies remain, however, and must be addressed between the Plans.
For example:
 - The definitions of ‘Prime Agricultural Area’ and ‘Prime Agricultural Land’ in ORMCP Part I, Section 3, need to be changed to mirror definitions in the other Plans and the Provincial Policy Statement. It is important that Prime Agricultural Areas be defined in

all the Plans as explicitly including “Prime Agricultural Lands and associated Canada Land Inventory Class 4 through 7 lands, and additional areas where there is a local concentration of farms which exhibit characteristics of ongoing agriculture.” All active farmlands in Ontario require protection and contribute significantly to the agricultural economy regardless of CLI Classification or a ‘prime’ designation.

- There is no acknowledgement or discussion of the ‘Agricultural System’ or ‘Agricultural Support Network’ in the NEP as there is in the other three Plans; this must be added.
- NEP only permits existing agricultural uses, existing agriculture-related uses and existing on-farm diversified uses. For agriculture to remain viable and sustainable in the NEP area, the word “existing” must be removed to acknowledge the ever-changing nature of farming and farm businesses, allowing for variation in types of crops and livestock, changing farm practices, use of modern technology, and adaptation to climate change.
- For clarity and consistency, agriculture should be explicitly supported as a part of Rural Areas in Growth Plan Section 2.2.9.
- The ORMCP restricts agricultural, on-farm diversified and agriculture-related uses to Prime Agricultural Areas. The working agricultural landscape on the Oak Ridges Moraine needs to be recognized and these agriculture uses should be supported in general agriculture and rural land uses designations as well.

2.0 Maintaining Improvements

Recommendations for maintaining improvements to the Plans, where the Province’s proposed changes to the four plans enhance and strengthen planning for growth management and the protection of the countryside and farmland resources:

A

Adopt the ‘Agricultural System’ and ‘Agricultural Support Network’

This new language introduces a more positive, holistic and coordinated approach to protecting and sustaining agriculture in the GGH.

- OFT supports new definitions and description of the Agriculture System and Agricultural Support Network, such as those in Greenbelt Plan Sections 1.4.2 and 3.1.1, Growth Plan Section 4.2.6, ORMCP Introduction – Some Key Land Use Policies.
- The Agricultural System language is missing from the NEP, however, and should be acknowledged and included as in the other Plans.
- Integration of these new terms throughout the Plans and their policies is supported as it explains the benefits and function of agriculture in the GGH and adds an important layer of protection for the community infrastructure and supportive farm services that are required for farming to remain viable, in addition to protecting the agricultural land base.
- Growth Plan Section 4.2.6.6. and Greenbelt Plan 4.2.6.6. however need to be modified to ‘require’ municipalities to implement strategies and other approaches to sustain and enhance the agricultural system and the long-term economic prosperity and viability of the agri-food sector, rather than just being ‘encouraged’ to do so.

B Identify, Map & Protect the Agricultural System

Nothing is more fundamental to protecting farmland and agriculture than identifying and mapping the Agricultural System across the GGH region.

- OFT strongly supports a leading role for the Province in identifying the Agricultural System for the GGH, and designating and mapping the Agricultural System and Prime Agricultural Areas for protection (Growth Plan Section 4.2.6 and 5.2.2.2., Greenbelt Plan Section 5.3)
- This is a top priority. The Province needs to set firm timelines for identifying, mapping, consulting and finalizing the Agricultural System. The process should be initiated immediately, with final mapping completed by spring 2017 for incorporation in municipal official plans as soon as possible, understanding the urgent need for enhancing the protection of farmland, farm operations and the Agricultural Support Network now.

C Require Agricultural Impact Assessments

The impact of non-agricultural development on adjacent farming operations must be assessed and mitigated for the agricultural sector to remain viable in the GGH.

- OFT supports introduction of the new requirement for ‘agricultural impact assessments’ to assess and mitigate the impact of proposed settlement area expansions, infrastructure, mineral aggregate operations and other non-agricultural developments within Prime Agricultural Areas and the Agricultural System (eg. Growth Plan Sections 2.2.8.2, 3.2.5, 4.2.8.4, Greenbelt Plan section 3.1).
- OFT encourages the Province to lead and work with municipalities and agricultural stakeholders to develop Agricultural Impact Assessment Terms of Reference, along with detailed guidelines for mitigating impacts to the Agricultural System, to support municipalities in implementing this proposed policy change.
- Ensure that the requirement for Agricultural Impact Assessments for proposed aggregate operations is also integrated into the Aggregate Resources Act to harmonize this approach across the Province.

D Increase Density & Intensification Targets for all Settlement Areas

Setting higher density and intensification targets is one of the most effective ways to decrease development pressure on farmland and protect the agricultural land base.

- OFT supports the increase in minimum intensification target to 60% of residential development being accommodated within the built-up area (Growth Plan Section 2.2.2.3)
- OFT supports the increase in minimum density target to 80 residents and jobs per hectare to be accommodated within designated greenfield areas (Growth Plan Section 2.2.7.2)

E Support Planning for Local Food, Urban & Near-Urban Agriculture

Inclusion of local food, urban and near-urban agriculture validates and supports a broader range of agricultural activities and business models in the GGH.

- OFT supports integration of urban and near-urban agriculture into the Agricultural System (Growth Plan Section 4.2.6.6., Greenbelt Plan Sections 1.2.2.1., 3.1.5, 3.3.3.3(f))
- More provincial guidance, programming, planning policies and tools are needed to support and sustain farming activities in this challenging environment, where conflicts with nearby or adjacent non-agricultural uses, trespassing, traffic, etc. are more prevalent.

F Recognize the Agricultural System as Part of Climate Change Resilience

It is important to recognize the important role that agriculture plays in climate change mitigation and adaptation, contributing to a more resilient future for communities, the environment and economy in Ontario.

- Acknowledging the Agricultural Systems' role in mitigating climate change and contributing to climate resilience is important. It is good to see language in the plans about protecting carbon sequestration potential and other ecological goods and services that are inherent in the Agricultural System (Greenbelt Plan Section 1.2.2.6, Growth Plan Section 4.1). Similar language and recognition could be included in the ORMCP and NEP as well.

3.0 Supporting Implementation

Recommendations for supporting implementation of the Plans, where companion programs and partnerships can strengthen planning approaches, and where more guidance and leadership is needed from the Province to foster collaboration, monitor progress, and achieve growth management objectives and the protection of the countryside and farmland resources:

A Create Meaningful Performance Indicators and Monitoring Procedures

Monitoring plan effectiveness at protecting agricultural lands and mitigating their loss to urbanization throughout the GGH is of the utmost importance.

- Current performance indicators for the four Plans are underdeveloped and inadequate to monitor progress on the protecting farmland and preventing fragmentation of the agricultural land base.
- The Province needs to be quantifying the amount of farmland that is being protected or lost as a measure of the effectiveness of the implementation of the Greenbelt and Growth Plan.

- Develop a monitoring and reporting process, and lead data collection and analysis, in cooperation with municipalities, that accurately measures annually how much agricultural land is being protected for agricultural uses in official plans and how much farmland is being redesignated for conversion to other non-agricultural uses across the GGH.
- Growth Plan Sections 5.2.2. and 5.2.6., Greenbelt Plan Section 5.8, ORMCP Part V and NEP Introduction on Performance Indicators all speak to an active role for the Province in gathering data and developing performance indicators and standards for monitoring implementation of the Plans.
- Ten years have passed with little to no progress in performance monitoring. Immediate data collection and benchmarking on farmland preservation is critical as the next ten year period of Plan implementation begins.

B

Develop Fiscal Tools and Guidance Materials

Land use plans with strong policy objectives of land protection and growth management need to be complemented with implementation tools, including robust fiscal tools, clear guidance materials and new resources for municipalities and implementation partners.

- The Province must expedite the process of developing essential guidance material needed by municipalities to effectively interpret and implement growth planning and land conservation policies and objectives. This includes guidance on:
 - Identifying and mapping the Agricultural System across the GGH and integrating this overlay into municipal official plans,
 - Understanding how to plan for the Agricultural System, including how to identify and protect the Agricultural Support Network,
 - Requirements and expectations for Agricultural Impact Assessments and what is to be included in the process for different types of non-agricultural developments such as proposed settlement area expansions and aggregate operations, and
 - Municipal 'Land Needs Assessments' with a standard methodology for land budgeting that all municipalities must follow (see 1B above for more).
- Set baseline requirements for development charges to be implemented by all municipalities to ensure growth pays for itself and does not place an undue burden on taxpayers. Maximize development charges for low-density sprawl on greenfield sites.
- Provide more support to local governments, helping them adopt best practices for calculating development charges in a way that discourages sprawl and incentivizes high density development within existing built areas.
- Create robust fiscal tools, programs and incentives to encourage municipalities and the building industry to invest in higher density, infill, redevelopment and transit-oriented developments within existing built areas.

C**Increase Agricultural Awareness among Plan Implementers**

The Province should assist municipalities in their understanding of the needs, challenges and opportunities associated with protecting farmland and the Agricultural System.

- The Province must ensure that plan implementers (e.g. municipal planners and councillors) understand the importance of agriculture in the GGH and provincial policies that aim to protect farmland and the Agricultural System. Offer educational opportunities such as professional development workshops and presentations to council in addition to providing educational and guidance materials.
- Require that Agricultural Advisory Committees be established in each GGH upper tier and single tier municipality to provide input to development proposals and planning decisions that impact the Agricultural System, working closely with planning departments and making recommendations to council.
- Upper-tier municipalities and single-tier municipalities should also be required to employ an Agricultural Liaison Officer, with funding support from the Province; this is a staff person who is responsible for reporting to the Director of Planning to provide expertise and guidance in land use planning decisions that impact agriculture.

D**Partner with Land Trusts to Enable Permanent Farmland Protection**

Work collaboratively with farmers, other private farmland owners, land trusts, and municipal partners, empowering them to take leadership in permanently protecting farmlands using 'farmland protection easement agreements' to buffer and prevent loss of farmland to shifting political commitment in the future.

- The Province should work collaboratively with farmers, other private landowners, land trusts and municipal partners and provide funding support for capacity building, program development and projects that will empower them to take action to strategically and permanently protect farmland via local land securement strategies and farmland easement agreements (that can be established through Ontario's Conservation Land Act).
- Permanently protecting farms with expanded use of farmland easement agreements can have significant impact by reinforcing land use planning boundaries such as the Greenbelt policy area that is intended to be protected in perpetuity, but increasingly under pressure for land removals and boundary adjustments by land speculators and development interests.

E**Link Provincial Land Use Plans to Other Provincial Initiatives**

The four provincial Plans would be enhanced by linking their land use policy objectives with emerging provincial programs such as Farms Forever (OMAFRA) and Ontario's Cap-and-Trade Program (MOECC).

- An acre of urbanized land emits 58% more greenhouse gas emissions than an acre of agricultural land (American Farmland Trust, 2014). Intensifying climate change concerns provide additional rationale for Province to strengthen growth management and land protection policies, as well as introduce programs that invest in permanent land protection.
- MMA should collaborate with Ministry of Environment and Climate Change (MOECC) to ensure that a portion of cap-and-trade revenues for the reduction of greenhouse gas emissions are invested in permanent land protection via land trusts and conservation easements, for the lasting protection of both agricultural and natural lands, in a way that bolsters land use planning policy objectives and solidifies protected area boundaries that are vulnerable to future development.
- The Province has committed to creating a 'Farms Forever' program through the Ministry of Agriculture, Food & Rural Affairs (OMAFRA) that supports farmers who want to protect their farms forever with farmland easements. Other goals include supporting near-urban agriculture, local food and the next generation of farmers. MMA, MOECC and OMAFRA should work together to integrate the Farms Forever program with provincial land use planning and climate change strategy initiatives for a dynamic, multi-faceted approach to farmland preservation that will result in a coordinated and sustainable effort to build a secure and prosperous future for the agricultural sector in the Greater Golden Horseshoe and throughout Ontario.