



February 20, 2019

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

**RE: EBR Registry # 013-4506 for input on the Proposed Framework for Provincially Significant Employment Zones**

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 Framework for Provincially Significant Employment Zones under 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 commitment to the integrity of the Greenbelt and the resultant exclusion of Greenbelt protected lands, including specialty crop areas, from the proposed provincially significant employment zones. Ontario’s productive agricultural lands are a finite and non-renewable resource that contribute to the success of the agri-food sector and its capacity to annually contribute over \$39 billion to the GDP and employ more than 820,000 Ontarians along the supply chain [1]. We also commend the Ministry’s acknowledgement and inclusion of critical employment hubs within the agri-food support network, as identified by the Ontario Ministry of Agriculture, Food, and Rural Affairs, while creating the Proposed Framework.



To build on the preliminary work conducted by the Ministry, the Ontario Farmland Trust has identified three proposed zones that require boundary changes to further protect farmland and align with provincially issued agricultural land base mapping:

Zone 1 – Durham South (Oshawa East & Clarington)

Zone 18 – 401 407 (Meadowvale)

Zone 20 – Milton

In each instance, the boundaries of the proposed provincially significant employment zones overlap those of prime agricultural areas identified within the provincially issued agricultural land base mapping and Agricultural System.

**OFT recommends that the boundaries of Zones 1, 18, and 20 are altered to avoid overlap with provincially issued agricultural land base mapping and, specifically, those identified as prime agricultural areas.** In each Zone, there are adjacent lands that are not identified as prime agricultural areas that are more suitably contained within a provincially significant employment zone. We would also like to stress the value and significance of prime agricultural areas as rural employment areas that support the province’s agri-food sector, which is a major source of employment throughout Ontario.

**OFT recommends that, henceforth, any additional or proposed provincially significant employment zones avoid overlap with prime agricultural areas.** A contiguous agricultural land base is integral to the longevity and viability of the Agricultural System. The fragmentation or destruction of the agricultural land base would have detrimental impacts on the economic contributions of the Province’s agri-food sector and the vitality of rural communities. There is an abundance of land outside of agricultural areas better suited to industrial and commercial uses.

**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.



Thank you for this opportunity to share our recommendations and feedback on the Proposed Framework for Provincially Significant Employment Zones. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further.

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/>