



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 # 013-4507 for input on the Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the Planning Act to implement 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, 2017, including the proposed modifications to O. Reg. 525/97. 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. As such, we support the proposed modifications to O. Reg. 525/97 and allowing municipalities the flexibility to ground truth and implement the Agricultural System for the Greater Golden Horseshoe mapping before their next municipal comprehensive review, with appropriate Ministerial approval and oversight.

The Ontario Farmland Trust has the following recommendations to strengthen the proposed amendments to the Growth Plan as related to the Agricultural System:



- 1) **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 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.
- 2) **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.
- 3) **OFT recommends that municipalities continue to be provided the option to “refine and augment provincial mapping” in section 4.2.6.9.**
- 4) **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 Modifications to O. Reg. 525/97. 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