



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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May 20, 2015

Mr. Richard Stromberg  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street  
Toronto, ON  
M5G 2E5

Dear Mr. Stromberg;

**RE: EBR Registry 012-3256 Co-ordinated Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan.**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario economy forward.

Well-formulated land use planning, that effectively addresses provincial growth objectives combined with the long-term protection of our critical and finite prime agricultural lands is a key, long-standing OFA objective.

A number of years ago, the Middlesex Federation of Agriculture posted the following message on a billboard. Now, while we are reviewing the four land use plans, we believe it is worthwhile reflecting on its message;

**Man, despite all his accomplishments, owes his entire existence to six inches of topsoil and the fact that it rains.**

While Ontario covers a vast and diverse area; 1.07 M sq. km. (415,598 mi<sup>2</sup>), with distinctly different geographic regions, we must not lose sight of the stark reality that less than 5% of Ontario's land base is capable of supporting any agricultural production. Of that 5%, a small proportion contains our best growing soils; Class 1, 2 or 3 lands.

Currently there are almost 7 billion people in the world. The United Nations projects the global population to rise to over 9 billion by 2050, just 35 years from now. Feeding ourselves and contributing to feeding the world on an ever reducing supply of productive agricultural land is a formidable challenge. Ontario must maintain as much of its limited arable land as possible in agricultural production. Ontarians must ensure that our actions and policies do not jeopardize our ability to produce food, fibre and fuel, in perpetuity, from our limited agricultural land base. We cannot continue to use our best agricultural land for urban uses.

Data from the 2011 census shows an alarming decline in the area being farmed over only 5 years. Ontario farms encompass 5.1 M hectares (12.6 million acres), down 259,890 hectares (636,302 acres) over the previous census. Regardless the reason, urban expansion, or aggregate extraction, or both, Ontario cannot continue to sustain an annual loss of 51,522 hectares (127,260 acres) per year while maintaining our ability to produce a higher volume food, fibre and fuel.

Putting 127,260 acres per year in different terms, that's 350 acres/day; the equivalent of 173 CFL football fields! If we continue to sustain losses of agricultural land at that rate, it makes achieving the Premier's challenge to double agriculture's annual growth rate and create 120,000 jobs by 2020 extremely difficult, if not outright impossible.

As the stewards of highly productive agricultural land, Ontario farmers have a keen interest in ensuring public policy does not jeopardize or destroy that resource. Ontario's farmers require and deserve the assurance that urban growth and development adjacent to one's farm will not be the end of that farm. Furthermore, we demand that future urban growth and development be achieved inside fixed, permanent urban boundaries, not through "greenfield" development.

Unfortunately, past experience clearly demonstrates that prime agricultural land is the one land use designation that is routinely and regularly sacrificed for many of society's wants including urban uses, aggregates, recreation and natural heritage.

Summary of OFA's recommendations;

- OFA does not endorse expansion of the Greenbelt, in its current form, into areas beyond its current outer boundaries,
- implement fixed, permanent urban boundaries (i.e. minimum 20-25 years), combined with mandatory, intensification targets,
- meaningful penalties for municipalities that fail to meet/achieve designated densities,
- apply the 2014 Provincial Policy Statement's Natural Heritage policies to agricultural lands under the Greenbelt Plan, thereby removing the negative impacts of buffers and vegetation that hosts harmful pests, etc.
- buffer all new urban development abutting agricultural lands, province-wide; sufficiently wide to deter trespass, the disposal of yard waste or even garbage and to minimize complaints over odours, noises, dusts,
- that regulations, policies, etc. across all ministries support agriculture, not impose unnecessary policy, statutory or regulatory restrictions,
- bring all four plans under the Ministry of Municipal Affairs and Housing,
- develop common language and policies for the four plans, based on the PPS,
- develop a consistent format and implementation methods for all four plans; i.e. all are land use plans, implemented through Official Plan conformity only, and
- end the approvals role of Niagara Escarpment Commission, replacing it with local municipal approvals only, based on Official Plan conformity with the Niagara Escarpment Plan.

#### **4.1 PROTECTING AGRICULTURAL LAND, WATER AND NATURAL AREAS**

- 1. How can the plans better support the long-term protection of agricultural lands, water and natural areas?**

**a) How can the plans better direct urban development to areas already developed?**

Improved long-term protection of agricultural lands, water and natural heritage can only be achieved through bold, decisive action. The OFA recommends fixed, permanent urban boundaries (i.e. minimum 20-25 years), combined with mandatory, intensification targets. The Growth Plan contains no penalties or consequences for municipalities that fail to meet their density targets. Furthermore, the Growth Plan enables municipalities to obtain lower density targets than those set out in the Growth Plan. We further recommend that municipalities that fail to meet/achieve designated densities should be penalized in a meaningful manner, namely the loss of any greenfield growth.

We support incentives and program to encourage redevelopment and intensification within existing urban boundaries, including provincial incentives to support and facilitate brownfield redevelopment. Intensification and redevelopment result in less pressure to convert our limited agricultural lands to urban uses, while maximizing our use of existing infrastructure.

Some Greenbelt municipalities have lost their agricultural support businesses/services. Without these businesses and services, farmers lose their ability to compete, and their sense that they have a long-term future, farming in that municipality. Incentives for agricultural support businesses/services to re-establish themselves in the Greenbelt may assist in reversing that trend and mindset. Agriculture sectors highly dependent on these services, livestock agriculture for example, leave because their long-term viability and sustainability is compromised.

A 2013 Neptis Foundation study, Implementing the Growth Plan for the Greater Golden Horseshoe found that approximately 107,000 ha (264,000 ac.) of land was designated for future urban growth across the Growth Plan area, an amount of land equal to 1.5 times the area of the City of Toronto! Surely this research clearly indicates that the Growth Plan municipalities have more than adequate lands available for future growth, and that no additional lands need to be allocated for growth at this time.

**b) Where are the opportunities to expand the Greenbelt both within urban areas, such as urban river valleys, and in the rural areas beyond the Greater Toronto Area?**

The Ontario Federation of Agriculture has no objections to expanding the Greenbelt into urban river valleys, within urban area boundaries.

We acknowledge that the Greenbelt Plan has protected its agricultural lands from loss to urban development. That being said, the OFA does not endorse expansion of the Greenbelt, in its current form, into areas beyond its current outer boundaries. We base our opposition on the following reasons;

- i) Greenbelt Natural Heritage polices negatively impact agriculture<sup>1</sup>,
- ii) The Plan never addressed viability of agriculture. Ontario needs to address agricultural viability through a regulatory regime that supports agriculture as the pre-emanate land use across the four plans, including food processors, value-adding and agricultural support services/businesses.
- iii) The current public meetings are not adequately organized and located to gather the perspective of agricultural property owners outside the current Greenbelt boundaries,

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<sup>1</sup> Further explanation is in our answer to Question 1c.

the property owners who will be directly affected by any outward expansion of the Greenbelt.

Only after full and open consultations with agricultural property owners outside the current Greenbelt can the Ontario Government truly ascertain their stance on expansion.

The Ontario government needs to explore alternative farmland protection methods other than Greenbelt; ones that do not penalize farmers simply based on their mailing address. Furthermore, Ontario's farmland losses occur all across the province. They are not limited to, or concentrated within, the area subject to the four plans. Containing urban sprawl, combined with effective farmland preservation, must be an Ontario-wide undertaking, based on workable, long-term solutions.

**c) What new approaches or tools could be used to protect agricultural land, water and natural areas?**

Protection of agricultural land, water or natural resources must never be pursued to the detriment of agricultural land, water or natural resources. All are critical; all merit protection.

The OFA believes that the Greenbelt Plan contains natural heritage protection policies that negatively impact agricultural activities within the Protected Countryside. This is particularly evident in the specialty crop areas of Niagara, where farm parcels are particularly small.

In specialty crop areas, small farms dominate the landscape. Niagara-on-the-Lake is one such specialty crop area, primarily producing grapes and tender fruit. More than 75% of the farms are less than 25 acres in size. Out of that area, one must deduct land for the house, barn, driveways, lawn and separation between the water well and septic system. There are also grassed strips between each row of vines, and at the ends of rows to allow equipment to turn. On a 12 acre farm, a 30 m buffer consumes about 3¼ acres, or 27% of the total area. The Greenbelt Plan also requires "natural self-sustaining vegetation" for these buffers, meaning woody plants, not grasses. However, these woody plants host a range of crop pests, blights, rusts, mildews, etc. They also shelter birds, insects, mice that prey on crops.

The Greenbelt Plan calls for minimum 30 metre (100 ft.) buffers along permanent and intermittent streams. These buffers, if rigorously applied, are an impediment to the viability of these small farms, to say nothing of their impact on ability of farmers to increase crop yields. How do policies such as this foster agricultural growth, and the protection of agricultural land? The OFA recommends that for agricultural lands under the Greenbelt Plan that the 2014 Provincial Policy Statement's Natural Heritage policies apply, thereby removing the negative impacts of buffers and vegetation that hosts harmful pests, etc.

In cases where urban development abuts farms, the OFA recommends a buffer on the urban side of the line, to provide some protection to the abutting farms. Urban residents often view large tracts of farmland as "open" to public use, for recreation, to let one's dog run or as a handy place to dispose of yard waste or even garbage. Farmland is private property and an active workplace, with uneven surfaces, large livestock and large equipment. Farmers often face complaints from neighbours over agricultural odours, noises, dusts, etc. While these nuisances are temporary, they do not threaten one's life or health. However, being too close to their source can give rise to disputes. Adequate separation can mitigate these problems. Since the Growth Plan proposes significant population growth throughout its area, the OFA demands that all new urban development abutting agricultural lands, province-wide, include a buffer, sufficiently wide

to deter trespass, the disposal of yard waste or even garbage and to minimize complaints over odours, noises, dusts.

We believe that the Ontario government must implement an environmental goods & services (EG&S) program, recognizing the associated benefits of maintaining agricultural land in agriculture; carbon sequestration, groundwater recharge, climate change mitigation and wildlife habitat, including pollinator habitat. Society at large benefits from these services. Farmers deserve financial recognition for providing these benefits to Ontarians, along with safe, abundant and affordable food.

The OFA proposes fixed, permanent urban boundaries, combined with enforceable density targets, as new approaches to protect agricultural land, water and natural areas. Without them, urban growth will continue to nibble away at our agricultural land, water and natural areas.

The OFA advocates for farmland protection policies that enable farmers to establish develop and grow their farm businesses, free from unnecessary land use policy, statutory or regulatory restrictions.

**d) How can we grow and strengthen the region's network of open spaces to provide for recreational opportunities?**

Firstly, the agricultural lands across the area subject to these four plans, and all across Ontario for that matter are privately owned. Ontario does a disservice to its farmers by perpetuating the myth that Greenbelt lands are somehow “public lands”, and thereby open to use by the general public.

Rather than directing the focus for more “open spaces” to our limited agricultural lands, we must better use our existing public lands; Conservation Authority lands, municipal parklands and provincial parks. We should encourage and facilitate the establishment of recreation-related businesses to set up in parks and on public lands, as one means of growing their use.

In addition, we could promote rails-to-trails developments provided that they fully address the interests and concerns of neighbouring farm operations, through addressing fencing, trespass, liability, farm crossings, etc.

From a rural and agricultural perspective, the provincial and municipal governments should actively support and encourage agri-tourism.

**e) How can the agricultural protection that the plans provide enhance the impact of agriculture on Ontario's economy?**

From OFA's perspective, it's the non-agricultural policies in the four plans that unduly restrict agriculture's ability to have a more positive impact on the overall Ontario economy. Agricultural landscapes, regardless of how they are named in the four plans, are working landscapes. As such, they support hydrologic and ecological functions. If the intent, vision and goals of these plans is to promote agriculture, and maintain these lands in agricultural production, then the language in the plans related to agriculture and natural heritage must work together to achieve this, and not, as they currently often do, act to hamstring agricultural production, innovation and viability.

Policies that truly promote and support agriculture, including activities related to value-added and on-farm diversified uses will enhance the impact of agriculture on Ontario's economy. In addition, the extension of natural gas lines, 3-phase power and water lines to support agricultural uses, agriculture-related uses and on-farm diversified uses is vital. The OFA recommends better definition of "infrastructure" in the Greenbelt Plan, combined with policies that also permit its extension into agricultural areas.

The OFA recommends that regulations, policies, etc. across all ministries support agriculture, not impose unnecessary policy, statutory or regulatory restrictions.

## **4.2 KEEPING PEOPLE AND GOODS MOVING, AND BUILDING COST-EFFECTIVE INFRASTRUCTURE**

### **2. How can the plans be strengthened to ensure our communities make best use of key infrastructure such as transit, roads, sewers and water?**

#### **a) How can the plans better leverage transit investments across the region?**

The OFA recommends the implementation of fixed urban intensification targets, with known consequences for municipalities who fail to meet them, combined with fixed, permanent urban boundaries. Together these will develop the compact urban form necessary for public transit. We should also look to enhance capacity of existing corridors, by expanding within their current rights-of-way. Furthermore, we should explore the possibilities of combining infrastructure corridors; hydro, road, rail, to minimize land losses to these uses.

A recent Ontario Home Builders' Association/Pembina Institute paper, "Make Way for Mid-Rise" proposes zoning for higher density developments along transit corridors and around transit stations. From our perspective, this is an excellent suggestion, and one that should be applied not only across the Growth Plan for the Greater Golden Horseshoe, but universally across Ontario.

In addition, the province needs to improve public intercity transit; more routes, higher frequency of service and lower fares.

#### **b) How can the plans better promote livable, walkable communities that use new and existing infrastructure in the most cost-effective way?**

We can promote more livable communities through intensification and higher density development, combined with compact urban form and redevelopment within existing urban boundaries. Ontario must require intensification and redevelopment within the existing urban built boundaries over "greenfield" development.

We can expand our network bicycle paths and accommodate bicycle parking at employment locations, perhaps through amendments to the Building Code.

#### **c) How can the plans align long-term infrastructure planning with planning for growth?**

The plans can align long-term infrastructure planning through mandatory intensification and higher density development combined with redevelopment within existing, fixed urban boundaries. As noted earlier, focusing higher density development along transit corridors and



around transit stations will facilitate better use of infrastructure. This will help to bring work and home closer together and thereby avoid further development of bedroom communities.

To facilitate higher density development, we should explore setting limits on lot size and house size, particularly as family size is shrinking, and our overall population is aging; factors that speak to smaller houses and lots.

**d) How can the plans better support goods movement by all modes of transportation?**

The OFA believes that we must facilitate the movement of large farm equipment on roads, bridges, traffic circles, etc. in active agricultural areas. Road, bridges and traffic circles that are not designed to safely accommodate modern farm equipment, e.g. hard, vertical curbs, traffic circles too narrow and/or too tight to allow wide and long farm vehicles to pass through, hinders the viability of agriculture in the area covered by the four Plans, as well as throughout agricultural areas beyond. If our goal is to maintain a viable agriculture industry in this area, then we must make our road system fully useable for farmers. The OFA recommends the development of design standards for roads, bridges and traffic circles that allow large farm equipment to freely move along, across and through these features.

The OFA believes that improved good movement can be achieved through a revitalized and enhanced rail system. More goods moved by rail will lessen the pressure on government to build more roads for goods movement.

Lastly, in addition, the OFA believes that we must better use Great Lakes shipping for goods movement, including improved truck access to and from lake ports.

**e) How can the plans identify and better protect strategic infrastructure corridors needed over the long term?**

The plans can identify and better protect strategic infrastructure corridors by ensuring that development adjacent to existing or proposed corridors doesn't impinge on their future expansion or use. Rail and road access to airports and to Great Lakes ports needs to be maintained and upgraded.

In addition, secondary and tertiary roads and bridges that can easily accommodate farm equipment reducing their use of main highways, and also facilitate the growth and development of Ontario's agriculture sector.

Lastly, the plans need to consider soil classification and the impacts on agriculture, including impacts on agriculture-supportive businesses and industries from existing or proposed strategic infrastructure corridors, to minimize the loss of prime agricultural land.

**f) How can the plans better balance the need for critical infrastructure to support economic growth with environmental protection?**

The plans can better balance the need for critical infrastructure to support economic growth with environmental protection by recognizing and acknowledging agriculture's contributions to environmental goods & services (EG&S), and by considering impacts on agriculture from critical infrastructure.

The plans must also ensure our road network facilitates farmers' access to farm support services and businesses, as well as the ability to easily move farm equipment and supplies between properties that make up the larger farm operation.

#### **4.3 FOSTERING HEALTHY, LIVABLE AND INCLUSIVE COMMUNITIES**

### **3. How can the plans continue to support the design of attractive, livable and healthy communities that are accessible to all Ontarians at all stages of life?**

#### **a) How can the plans provide more direction on designing:**

- i. Communities that have the right layout and mix of parks, natural areas, public spaces and people-focused streets?**

The plans can continue to promote urban areas that are an inviting place to live, with a broad range of amenities for residents, plus services for people who live outside the urban boundaries.

- ii. A safe and interconnected network of streets that support walking and cycling, and that are connected to our transit networks and key destinations?**

We view this question as not applicable to agriculture.

#### **b) How can the plans better support the development of a mix of housing that meets the needs of the region's growing population, including affordable housing?**

The plans can better support the development of a mix of housing that meets the needs of the region's growing population through hard density targets, known consequences for failure to meet them and no reductions in assigned densities.

To facilitate higher density development, we should explore setting limits on lot size and house size, particularly as family size is shrinking, and our overall population is aging; factors that speak to smaller houses and lots.

The Plans need to demonstrate and facilitate an enhanced role for small communities. Our rural communities shouldn't be neglected over large urban centers.

All communities need financial support from the Provincial Government. Enhanced transfers to municipalities will enable them to pay for the programs and services they're obligated to provide.

#### **c) How can the plans better protect heritage buildings, cultural heritage landscapes and archeological resources?**

The OFA cautions against heritage building preservation policies that impede 21<sup>st</sup> century agriculture from thriving. Farmers with outdated buildings, such as bank barns, must be free to replace them with modern structures, or remove them altogether.

We also fear the outcome of cultural heritage landscape policies. Agricultural areas are working landscapes. Their maintenance requires the ability to change and adapt how the landscape is used, including the types of buildings present, also with crops, fence rows, etc.

Lastly, new farm buildings must be exempt from any cultural heritage landscape implications.



The OFA recommends that uses that permit the farmer to derive income from agricultural buildings will facilitate their preservation better than strict protection policies.

#### **4.4 BUILDING BETTER COMMUNITIES THAT ATTRACT WORKERS AND CREATE JOBS**

##### **4. How can the plans better support the development of communities that attract workers and the businesses that employ them?**

###### **a) How can the plans better support the development of vibrant office and mixed-use employment areas near existing and planned transit, as well as the protection of industrial and commercial uses, particularly those near critical transportation infrastructure?**

The plans can better support the development of communities that attract workers and the businesses that employ them by providing the basic underpinning of complete communities; ones with natural gas distribution infrastructure extended throughout rural/agricultural areas, combined with a farm/industrial electricity rate and high-speed broadband service for rural and agricultural areas. Without these basics, communities will not attract workers and employers.

Compact urban form, through the application of firm, enforceable urban density targets, combined with fixed, permanent urban boundaries will, in our opinion, facilitate an urban form that will attract and retain workers and employers.

Urban centers wishing to attract workers and employers need to facilitate a business environment that fosters job growth, combined with industrial development too.

###### **b) What is the role of retail in building vibrant communities and how can the plans support or direct retail development?**

We view this question as not applicable to agriculture.

###### **c) How can the plans balance the need for resource-based employment, including the agri-food and mineral aggregates resource sectors, with protecting the natural environment?**

Land use plans need to acknowledge that both resource-based employment and the protection of the natural environment are necessary and land use plans need to balance these land uses. Resource-based employment is predicated on where the resource is.

We disagree with comparing agriculture, agri-food and aggregates. We view them as fundamentally different. Agriculture and agri-food are essentially permanent uses. Primary agriculture can continue forever. Soil fertility is maintained and improved through conservation tillage, the judicious application of nutrients, combined with cover crops. Agriculture provides carbon sequestration, groundwater recharge, climate change mitigation and wildlife habitat in addition to producing food, fibre and fuel.

###### **d) How can the plans policies better support and foster vibrant rural economies while taking into account the character of rural areas and communities?**

Vibrant rural communities are ones that provide a range of employment opportunities for citizens; employment opportunities that do not force people to relocate to large communities to

pursue employment. To enable vibrant communities, we advocate the adoption of policies that will extend natural gas distribution throughout rural/agricultural areas, providing rural resident and businesses with affordable, clean energy, combined with a farm/industrial electricity rate and high-speed broadband service for rural and agricultural areas.

Vibrant, prosperous and sustainable farms support viable agricultural operations. In near-urban portions of the Greenbelt, farmers lack ready access to farm support services and businesses, placing them at a competitive disadvantage with farmers further afield.

Vibrant agricultural communities are capable of adapting to changing market demands, based on access to agriculture-supportive industries and food processing, underpinned by reduced red tape and regulations, policies, etc. across all ministries that support agriculture.

#### **4.5 ADDRESSING CLIMATE CHANGE AND BUILDING RESILIENT COMMUNITIES**

##### **5. How can the plans help address climate change?**

###### **a) How can the plans contribute to reductions in greenhouse gas emissions?**

Building compact urban centers, achieved through conforming to mandated higher urban densities, within fixed, permanent urban boundaries will contribute to reduced greenhouse gas emissions.

Secondly, maintaining our agricultural lands in production along with protecting our natural heritage features and areas from development will contribute to reduced greenhouse gas emissions. In the case of maintaining our agricultural lands in production, in addition to producing food, fibre and fuel for Ontarians, Canadians and beyond, agricultural lands also provide carbon sequestration, groundwater recharge, climate mitigation and wildlife habitat.

###### **b) How can the plans provide more direction on building resilient communities that can withstand extreme weather events related to climate change?**

Hard urban surfaces exacerbate the effects of extreme weather events. The plans can mitigate some of the effects of extreme weather events by maintaining our agricultural lands and natural heritage features and areas in their current state, thereby facilitating groundwater recharge and the need to build systems to handle stormwater runoff. Our agricultural lands and natural heritage features and areas also provide carbon sequestration, climate mitigation and wildlife habitat.

Lastly, the plans should encourage the use of permeable surfaces in urban areas.

###### **c) Is there a need to consider new policy approaches in the plans to increase the resiliency of our communities by reducing the development pressures on natural areas, open spaces and flood prone areas?**

We can reduce development pressure on natural areas, open spaces and flood prone areas by maintaining agricultural and natural heritage lands in their current form/use for infiltration, groundwater recharge, carbon sequestration,

Fixed urban boundaries, higher density development combined with no reductions of density targets and known consequences for failure to meet them will also reduce development pressure.

#### 4.6 IMPROVING IMPLEMENTATION AND BETTER ALIGNING THE PLANS

##### 6. How can the implementation of the plans be improved?

##### a) Are there opportunities to better align key components of the plans with each other, and with other provincial initiatives? Are there ways to reduce overlap and duplication?

The OFA firmly believes there are opportunities to better align the four plans, and reduce overlap and duplication. Firstly, we recommend that all four plans be brought under the Ministry of Municipal Affairs and Housing. Currently, three of the four plans are under the Ministry of Municipal Affairs and Housing, with the Niagara Escarpment Plan being under the Ministry of Natural Resources and Forestry.

The format, implementation and delivery of the four plans also differs. We acknowledge that the four plans were created at different times, and to achieve different goals and objectives. We further recommend that the four plans utilize common language and policies, based on the PPS.

The OFA recommends the development of a consistent format and implementation for all four plans; i.e. all are land use plans, implemented through Official Plan conformity only. We recommend the Oak Ridges Moraine Conservation Plan, currently a regulation, be changed to a land use plan. Lastly, we recommend ending the approvals role for Niagara Escarpment Commission, replacing it with local municipal approvals only, based on Official Plan conformity with the Niagara Escarpment Plan.

The OFA proposes more emphasis on the protection of agricultural land across the area subject to these four plans.

An emerging concern is when some acts, e.g. the proposed Great Lakes Protection Act or the Green Energy Act, supersede or “trump” other provincial acts, policies. In addition, Greenbelt Plan Policy 3.2.2.7 allows regulations and standards of other agencies or levels of government to supersede the Greenbelt Plan. The OFA believes this practice is fundamentally wrong, and negates the principles of universal and consistent application of policies. Policies such as 3.2.2.7 must be removed.

##### b) What policies of the plans do you think have been successful and should be retained?

Both Niagara Escarpment Plan and Oak Ridges Moraine Conservation Plan have protected the unique natural features they were intended to protect from development. Furthermore, the Greenbelt Plan has protected agricultural lands in the GTA from urban growth and development. Finally, the Local Food Act supports Ontario agriculture.

However, this only asks half the question. This section should also ask, **What policies of the plans do you think have been unsuccessful, and should be dropped or revised?**

The Ontario government has expended no effort to address the long-term viability of agriculture; not only in the area covered by the four plans, but province-wide. This was a recommendation from the Greenbelt Task Force, in its 2004 Report. The issue has never been fulsomely addressed. Now is the ideal time to address the long-term viability of Ontario agriculture.

The Greenbelt Plan didn't effectively contain sprawl and leapfrogging of development beyond its borders. Some of the fault lies in the Greenbelt Plan and some in the Growth Plan for the Greater Golden Horseshoe. Nevertheless, if the Ontario government is truly committed to the protection of our finite agricultural land, then the four Plans need to effectively address leapfrogging and sprawl by implementing fixed permanent urban boundaries, firm urban density targets that are enforceable and not subject to reductions for any reason, combined with harsh consequences for municipalities that chose to ignore their density targets.

The OFA believes the Growth Plan for the Greater Golden Horseshoe has failed to achieve its goals; it contains no enforcement of density targets and no consequences for failure to meet density targets. Furthermore, the Simcoe Sub-Area amendment and the growth of the City of Barrie combined to allow urban growth and development on 7,300 acres of prime agricultural and environmentally-sensitive lands. Employment Lands were designated from agricultural and environmentally-sensitive lands contrary to every Guiding Principle set out in the Growth Plan for the Greater Golden Horseshoe.

Lastly, the Greenbelt Plan's Natural Heritage Policies are hindering agricultural use and development, by applying 30 metre buffers around watercourses, man-made ditches and agricultural drains. In addition, a 30 metre separation from natural heritage features, such as woodlots, pushes new barns and other farm buildings out into productive croplands rather than close to the edge of the feature, thus maximizing use of croplands.

**c) Should the province develop any additional tools or guidance materials to help support implementation?**

The OFA believes that the province should enforce its intensification targets in the Growth Plan for the Greater Golden Horseshoe. In addition, the province should support role of agricultural land plays in providing Environmental Goods and Services to all Ontarians through carbon sequestration, groundwater recharge, climate change mitigation and wildlife habitat, in addition to providing safe, affordable food.

Planning schools seem to focus on urban planning, not rural planning or redevelopment. Ontario's land use planning schools also need to focus their curricula on rural and agricultural land use planning, including emphasis of the overall roles of an agricultural system and its constituent parts.

**d) Are there other opportunities to better facilitate implementation?**

The OFA firmly believes there are other opportunities to better facilitate the implementation of the plans, including bringing all four plans under the jurisdiction and oversight of one ministry, namely the Ministry of Municipal Affairs and Housing. In addition, the Ministry of Municipal Affairs and Housing should develop a consistent format and implementation for all four plans, utilizing common language and policies across all four plans; based on the Provincial Policy Statement.

Lastly, the OFA recommends elimination of the approvals role of the Niagara Escarpment Commission. The Niagara Escarpment Plan, like other provincial land use plans, should be implemented and delivered through Official Plan conformity.

**e) Do the plans appropriately distinguish the differences between urban and rural communities?**

The OFA believes that the plans do not appropriately distinguish the differences between urban and rural communities. Furthermore, we do not believe this problem is limited to the four land use plans. The provincial government and our municipal governments all too often fail to recognize the differences between urban and rural communities.

The OFA believes that fixed, permanent urban boundaries, combined with land use policies that support and promote agriculture as the preeminent land use across our rural and agricultural areas are critical.

We advocate for a larger role for the Ontario Ministry of Agriculture, Food and Rural Affairs in both land use planning as well as in informing other ministries on the best methods to engage rural and agricultural stakeholders in policy discussions, and in the effective delivery of government services.

The Ontario Federation of Agriculture believes that society places too little value on our agricultural lands, the finite resource we depend upon for our existence. People are starting to again understand and care where their food comes from, and how it is produced. There is growing support and advocacy for the protection of our limited agricultural lands. Ontarians are better understanding that the siting of alternative uses on our prime agricultural lands will limit our ability to continue to produce food.

The OFA welcomes this opportunity to provide its perspectives on the Co-ordinated Review of the Growth Plan for the Greater Golden Horseshoe, Greenbelt Plan, Oak Ridges Moraine Conservation Plan and Niagara Escarpment Plan. We look forward to the next stage of the Review.

Sincerely,



Don McCabe  
President

cc: OFA Board of Directors  
OFA County Federations

Encl.

### **Additional OFA suggestions for changes to plan language, policies, etc.**

The Ontario Federation of Agriculture strongly reiterates use of the 2014 Provincial Policy Statement's definitions and policies as the template for definitions and policies in the four plans.

The definition of "wetlands" differs between the plans and the Provincial Policy Statement. Given that a review of the provincial wetland policies is noted in the ministerial mandate letter to the Ministry of Natural Resources and Forestry, the OFA proposes that the Provincial Policy Statement definition of "wetlands" be used across the four plans under review.

The Oak Ridges Moraine Conservation Plan includes a number of definitions of terms that differ from the version found in the 2014 Provincial Policy Statement. Among them are; agricultural uses, agriculture-related uses, development, fish habitat, prime agricultural area and prime agricultural land and site alteration.

The Oak Ridges Moraine Conservation Plan also contains several unique definitions; animal agriculture, bed and breakfast establishment, farm vacation home, home business and home industry.

Curiously, specialty crop area is not defined in the ORMCP.

The following are similar examples from the Niagara Escarpment Plan; accessory building or structure, accessory use, agriculture areas, agricultural use, bed and breakfast home, cottage industry, home industry, home occupation and home business, farm property, farm products, minimum distance separation and prime agricultural areas.

The Niagara Escarpment Plan defines a "farmer" with problematic language, namely "main occupation is farming" and "primary income is derived from agriculture". No other provincial land use plan uses similar language. These considerations are far outside the scope of a land use plan. The definition should be dropped.

Some Niagara Escarpment Plan definitions use highly subjective language. The definition of a "farm pond" includes the phrase, "considered by the implementing authority" to be necessary. It should be dropped.

### **Greenbelt Plan:**

In agricultural areas, natural self-sustaining vegetation serves as a host for blights, fungi, insects or wildlife that prey on crops or livestock. It should never be used/required within agricultural or specialty crop areas of the Protected Countryside.

Site alteration should exclude activities related to site preparation for construction of a new building, or an addition to an existing building where the construction of buildings is a right, from land use and zoning.

Infrastructure:

Need to recognize the extension of agriculture-supportive infrastructure (natural gas, 3-phase electricity, water) are permitted within agricultural areas of the Protected Countryside.



3.2.4 Key Natural Heritage Features and Key Hydrologic Features Policies should only apply to the features themselves, not to adjacent agricultural lands, and to any agricultural uses on these adjacent lands.

Regarding Natural Heritage designations of features, in all cases these features and their boundaries need to be “ground truthed” before final designation and natural heritage policies are applied, to ensure that mapping/designation are correct.

### 3.3 Parkland, Open Space and Trails

3.3.2: omits reference to private land owners from “partners” list

3.3.2.4: add item (h), “respects the rights of private land owners”

3.4.2.5: settlements; add (g), “avoids prime agricultural lands

#### **Oak Ridges Moraine Conservation Plan Policies:**

add “agriculture-related uses” and “on-farm diversified uses” in Natural Core and Natural Linkage Policies (11 & 12)

change farm vacation home and bed and breakfast establishment to “agri-tourism uses” in Countryside Area Policies (13)

replace “home industry” and “home business” with “agriculture-related uses” and “on-farm diversified uses”

add “agriculture-related uses”

change farm vacation home and bed and breakfast establishment to “agri-tourism uses”

Section 28(2)3 [page 37] Wellhead Protection Areas; treats the storage of agricultural equipment differently than cars and trucks, which (have no limitations; not mentioned. Also, what is “personal or family use”?

Section 32(1)1 retirement severances were dropped from the PPS in 2005; this policy is out-of-date

Section 32(1)2 does permit severances to address merged titles

Section 34 “uses accessory to agricultural uses”

(c) the requirement for temporary housing for seasonal or full-time farm help is unacceptable, and discriminatory; similar to NEP provisions

For full-time help, the Plan should allow for a permanent dwelling within or adjacent to, the farm building cluster. Alternately, a residence surplus to a farm operation could serve as housing for full-time help. For seasonal labour, dwelling standards are regulated through the federal government and local public health departments.

Section 39 (trail system)

The trails system should be located away from private agricultural land. Trails located adjacent to or through farms must be appropriately fenced to mark the trail limits, as well as signed. The

trail system shouldn't preclude use of unopened road allowances or abandoned railway rights-of-way, where available.

### **Niagara Escarpment Plan Policies:**

#### **Escarpment Natural Area (1.3):**

No provision for agriculture-related uses or on-farm diversified uses; both should be added

#### **Escarpment Protection Area (1.4):**

##### **Permitted Uses:**

4 only allows for mobile or portable dwellings for farm labour. The requirement for temporary housing for seasonal or full-time farm help is unacceptable, and discriminatory. For full-time help, the Plan should allow for a permanent dwelling within or adjacent to, the farm building cluster. Alternately, a residence surplus to a farm operation could serve as housing for full-time help. For seasonal labour, dwelling standards are regulated through the federal government and local public health departments.

#### **Escarpment Rural Area (1.5):**

##### **Permitted Uses:**

4 again, only allows for mobile or portable dwellings for farm labour. The requirement for temporary housing for seasonal or full-time farm help is unacceptable, and discriminatory. For full-time help, the Plan should allow for a permanent dwelling within or adjacent to, the farm building cluster. Alternately, a residence surplus to a farm operation could serve as housing for full-time help. For seasonal labour, dwelling standards are regulated through the federal government and local public health departments.

### **Part 2; Development Criteria:**

#### **2.2.**

1 a) the phrase "visual attractiveness" is subjective, and should be removed

1 (f) for Agricultural Purposes Only (APO) lots, excluded uses include wineries, greenhouse operations, equestrian centres and mushroom farms; but these are bona fide farming activities and should be permitted.

4 again, reference to "visual and cultural characteristics of the area"; subjective and should be removed

#### **2.10 Agriculture**

The following text from the Niagara Escarpment Plan, relates to Dwelling Units Accessory to Agriculture;

3. A dwelling unit(s) may be permitted accessory to an agricultural operation on the same property as the principal farm house subject to conformity with the following:

a) Farm-help must be necessary on a seasonal or full-time basis on the farm.

b) The farmer shall live in the principal farm residence with farming as his/her principal occupation, and in the case of seasonal farming work part-time on the farm.

- c) The dwelling unit(s) shall be mobile or portable, without a basement; or in the case of horse farming, a dwelling unit may be permitted within a farm building, i.e., the horse barn.
- d) The dwelling unit(s) shall be located within the farm cluster and where possible, use the existing farm lane access and a separate lot shall not be created for it.
- e) The Development Permit shall be valid for three years only.
- f) Continuance of dwelling unit(s) will be considered through reapplication on a three year basis subject to adequate justification that the farm-help continues to be necessary to the farm operation.
- g) The dwelling unit(s) shall be removed when no longer required and/or when the Development Permit(s) expires.
- h) That any approval or agreement struck between the local municipality and the applicant to permit the additional dwelling unit(s) or farm help shall also be renewed, if necessary, on the anniversary of the Development Permit.

The language used here is subjective, and open to abuse. Housing for farm labour is a recognized “agricultural use” under the PPS, with no limitations on the type of housing provides no requirements for additional permits, over and above a building permit, and absolutely no requirements to reapply and justify one’s application and need. Furthermore, it appears that Development Permits are not transferrable, making new owners of the farm reapply, with no assurance they will be successful. The Development Permit system, as it relates to agricultural lands and operations should be eliminated.