



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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October 20, 2016

Ms. Cindy Tan  
Ministry of Municipal Affairs  
Growth Secretariat  
777 Bay Street  
Toronto, ON  
M5G 2E5

Dear Ms. Tan;

RE: EBR Registry Number 012-7194 Proposed Growth Plan for the Greater Golden Horseshoe, 2016 (part of the Co-ordinated Land Use Planning Review)

EBR Registry Number 012-7195 Proposed Greenbelt Plan, 2016 (part of the Co-ordinated Land Use Planning Review)

EBR Registry Number 012-7197 Proposed Oak Ridges Moraine Conservation Plan, 2016 (part of the Co-ordinated Land Use Planning Review)

EBR Registry Number 012-7198 Proposed amendment to the Greenbelt Area boundary regulation (part of the Co-ordinated Land Use Planning Review)

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

OFA welcomes this opportunity to present its perspective on the proposed amendments to these three land use plans, and on the proposed adjustments to the Greenbelt Area boundary regulation.

Regrettably, each of the three plans lacks explicit recognition that agricultural areas not only provide us with safe, affordable food, fibre and fuel, but also a broad range of environmental and ecological goods and services that benefit all Ontarians. These services, in alphabetical order, include;

- aesthetic and recreational space,
- air quality (carbon sequestration, climate regulation, oxygen production),
- biodiversity,
- nutrient cycling,
- pollination services,
- soil erosion control, and
- water cycling (flood mitigation, groundwater recharge, purification, retention).

This continued oversight of the broad range of environmental and ecological goods and services provided by actively farmed agricultural lands is troubling. OFA strongly encourages the Ministry of Municipal Affairs to include in each of these three plans language outlining the environmental and ecological goods and services provided by actively farmed agricultural lands.

OFA also reiterates its concerns over Ontario's shrinking agricultural land base. Based on data from the 2006 and 2011 censuses, Ontario has lost almost 260,000 ha (636,000 acres) during that five-year period. To put that number in perspective, it amounts to 350 acres each and every day; the equivalent to 173 CFL football fields.

Given the anticipated population growth in Ontario, Canada and across the world, OFA believes Ontario must retain the maximum amount of its arable land as possible, to be able to provide food for Ontario, Canada and the world. Policies that promote compact urban development through higher densities are welcomed. Policies that hinder farmers' ability to fully use their land for agricultural uses are denounced. Policies that deter "*agricultural uses*", "*agriculture-related uses*", "*agri-tourism uses*" and "*on-farm diversified uses*" have no place in the Co-ordinated Land Use Planning Review, specifically within the proposed Growth Plan for the Greater Golden Horseshoe, the proposed Greenbelt Plan or the proposed Oak Ridges Moraine Conservation Plan or their companion plan, the proposed Niagara Escarpment Plan.

#### **Growth Plan for the Greater Golden Horseshoe:**

OFA notes that there are no lot creation policies in the Growth Plan. Does this mean that for lot creation, plan users are to rely on the Provincial Policy Statement (PPS)? If so, OFA recommends each plan clearly state that for matters not addressed by the specific plan, plan users are to rely on the PPS.

The population growth projections through 2041 in the Growth Plan for the Greater Golden Horseshoe are key to the ultimate success or failure of the Plan. Overestimate future growth and an excess of agricultural land will be lost to future growth. Underestimate future growth and municipalities will be pressured to respond by designating additional agricultural lands, resulting in future agricultural lands being lost. An inability to accommodate growth would also have negative economic impacts. Projecting future population growth, including when and where, is by no means an exact science. Nevertheless, governments need to be as close to actual growth with its estimates as is humanly possible.

OFA questions why the population forecasts found in the Growth Plan for the Greater Golden Horseshoe differ markedly from those prepared by the Ministry of Finance? And more troubling is the fact that the Growth Plan's forecasts routinely exceed the Ministry of Finance's projections. How can two branches of the same government reach such divergent conclusions?

The Federal Government completed a Census earlier in 2016. We can expect that population and demographic data from it will soon be available. OFA strongly recommends that that urban expansions and any re-designation of agricultural lands in the Growth Plan area be delayed until the 2016 Census data is available, and that the Growth Plan's "Distribution of Population and Employment for the Greater Golden Horseshoe to 2041 (Schedule 3)" be revised to reflect the 2016 Census data.

Reliance on overly optimistic population projections will be the "justification" for re-designating prime agricultural lands for urban growth and development, an outcome contrary to the Growth

Plan's guiding principles of protecting prime agricultural lands, protecting natural heritage features, hydrologic features, prioritizing intensification and transit-supportive densities. We have previously noted in this response the significant losses of productive agricultural land over the 2006 and 2011 Censuses. These are unsustainable agricultural land losses, particularly when viewed in the context of the economic activity and employment contributed by Ontario's agri-food sector. The current levels of production cannot be maintained if the land base on which they depend is being lost in ever increasing amounts to urban development.

Intensification targets are still only targets; not an absolute requirement (2.2.2.3; Page 17). OFA is disappointed that its 2015 recommendation for mandatory compliance with densities was ignored. We reiterate our previous recommendation; that there either be mandatory compliance with intensification targets, or there be significant consequences for municipalities that choose to ignore them.

Also of note, there is no mention of the role of agriculture as the principle input supplier to food processing; a major employer and GDP contributor (2.2.5; Page 19-21).

Greenfield density targets are proposed to increase from 50 to 80 persons and jobs/hectare (2.2.7.2; Page 22). We welcome this change. Higher greenfield densities should lessen the demand to convert agricultural lands to non-agricultural uses. However, we are disappointed that our 2015 recommendation for mandatory compliance was ignored. We reiterate our 2015 recommendation; that there either be mandatory compliance or there be strict penalties for municipalities that choose to ignore greenfield density targets. As well, the draft Growth Plan continues to allow alternative greenfield densities. OFA categorically opposes this policy option. We request that compliance with densities be mandatory, with consequences for municipalities that fail to meet their required intensification densities that serve as an effective deterrent.

The Growth Plan also fails to impose fixed, permanent urban boundaries on settlement areas within the Plan. OFA reiterates its recommendation that the Growth Plan adopt fixed, permanent urban boundaries for its settlement areas.

The policies for Rural Areas (2.2.9; Page 26) seem to assume no agricultural activities are occurring in these areas. While these lands are not as productive as our prime agricultural lands, they nevertheless do contribute significantly to Ontario's overall agricultural production. To ignore their contribution to Ontario's overall agricultural production is an unacceptable oversight. OFA recommends that the policies for Rural Areas be amended to recognize agricultural activities.

The policies on transportation (3.2.2; Page 31) include no reference to the use of the road system by agricultural equipment. Farmers depend on access to Ontario's road system to move farm equipment and supplies to fields not immediately accessible from the "home" farm. Farm equipment is wider than most other vehicles using our roads. Roads, bridges and traffic circles, in areas where farming is an ongoing activity must be designed to accommodate farm vehicles. Potential impediments to the free movement of farm vehicles can include hard 90° curbs on roads, narrow traffic circles and bridge railings close to the edge of the traveled surface. Municipal planners and transportation engineers need design standards that facilitate the free movement of farm vehicles. OFA recommends that the Ministry of Transportation, in collaboration with farm equipment manufacturers, develop design guidelines for roads, bridges and traffic circles that allow for the free movement of farm vehicles. OFA further recommends that the policies referencing "*complete streets*" ensure that farm vehicle needs are fully

accommodated on all roadways used by farm vehicles. The long-term viability of agriculture depends on farmers' full and free access to Ontario's road network.

Policy 3.2.5 (Page 33) speaks to infrastructure corridors but does not mention local distribution networks for natural gas, electricity and municipal water to support and enhance agricultural growth. The future viability of agriculture within the Growth Plan's area depends on agriculture's access to natural gas, electricity and municipal water.

Policies for lands adjacent to key natural heritage features (4.2.4.4; Page 44-45), particularly (b) and (c) are more restrictive than the parallel policies in the Greenbelt Plan. Why are the draft Greater Golden Horseshoe Growth Plan's policies for lands adjacent to key natural heritage features stronger than parallel policies in the Greenbelt Plan? OFA recommends that the draft Greater Golden Horseshoe Growth Plan's policies for lands adjacent to key natural heritage features parallel those in the Greenbelt Plan.

Policy 4.2.6.6 (Page 47) pertaining to the Agricultural System uses "soft" language. Rather than "requiring" municipalities to "implement strategies and other approaches to sustain and enhance the agricultural system", municipalities are simply "encouraged" to do so. From our perspective, this is not sufficient. Past practice strongly indicates that unless compliance with policies is mandatory, compliance will not happen. OFA recommends that implementation of policy 4.2.6.6 be mandatory. Furthermore, OFA recommends that in policy 4.2.6.6. (b) (Page 47), an Agricultural Impact Assessment (AIA) should also be mandatory to assess negative impacts on the agricultural support network.

In policy 4.2.8.4 (Page 48) on Mineral Aggregates, the required use of an Agricultural Impact Assessment (AIA) is welcomed. However, policies 4.2.8.4. (a), (b) and (c) focus solely on restoring an aggregate site to one of equal or greater ecological value. This seems to imply that rehabilitation to an end use other than agriculture is preferred. Only in 4.2.8.4.(d) is "rehabilitation back to an agricultural use" referred to, and is subject to caveats. For lands that were in an agricultural designation before aggregate extraction (both prime agricultural lands as well as rural lands used for agriculture), OFA categorically demands that rehabilitation back to an agricultural state be a fundamental requirement.

Within the "*energy transmission pipeline*" definition, the term "*local distribution pipeline*" is used, but is not defined anywhere. Given Ontario's commitment to begin funding a program to extend our natural gas distribution system throughout agricultural and rural Ontario, OFA recommends including a definition for a "*local distribution pipeline*" in the final version of this Plan.

### **Greenbelt Plan:**

Policy 1.2.2.1 (b) (Page 5) references only the Niagara Peninsula Specialty Crop Area, but omits the Holland Marsh Specialty Crop Area. Policy 3.1.1 (page 16) references both. OFA requests policy 1.2.2.1.(b) be amended to reference both Specialty Crops Areas; the Niagara Peninsula Specialty Crop Area and the Holland Marsh Specialty Crop Area.

Policy 1.2.2.1.(f) (page 5) speaks to planning for "local food" and "near-urban agriculture", but provides no details or direction on how either will be achieved. Policies that will foster local food and near-urban agriculture are important, given the challenges farmers in near-urban settling face. OFA recommends that the Greenbelt Plan develop and implement a suite of planning policies that actively support and facilitate near-urban agriculture and local food. Policies and actions that would contribute include road design features that facilitate the movement of farm

vehicles (broad, flat shoulders, no hard 90° curbs, bridge railings that do not restrict wide farm equipment, traffic circles that are capable of accommodating wide farm vehicles), buffering between agricultural areas and adjacent urban land uses, improved enforcement of the Trespass to Property Act and ensuring that dog owners keep their pets on a leash unless in a recognized “off leash” park or on their own property.

In the draft Greenbelt Plan (3.1.2.1 [Specialty Crop] and 3.1.3.1 [Prime Agricultural Areas]) the wording “normal farm practices and a full range of agricultural, agriculture-related and on-farm diversified uses are supported and permitted” is used. This is not the same wording as found in PPS Policy 2.3.3.2, which states, “in prime agricultural areas, all types, sizes and intensities of agricultural uses ...”. Considering the Plan’s Vision Statement asserts that protection “against the loss and fragmentation of the agricultural land base and supports agriculture as the predominate land use”, and lists its agricultural viability and protection goals first under the Protected Countryside Goals, the weaker language that follows in 3.1.2.1 and 3.1.3.1 is unacceptable. It undermines the Plan’s Vision and Goals statements. OFA recommends that the PPS wording, “all types, sizes and intensities of agricultural uses ...” be used instead.

Policy 3.1.5 (e) (Page 19) speaks to “agriculture-supportive infrastructure” While infrastructure itself is defined, there is no definition for what “agriculture-supportive infrastructure” is. OFA recommends development of both a definition of, and guidance material on the elements of “agriculture-supportive infrastructure”.

Policy 3.2.5.7 (Page 27) pertains to the 30 metre (100 ft.) setback from key Natural Heritage features. While we understand the rationale for this policy, in the case of woodlots and agricultural buildings, siting these structures closer to the edge of the woodlot would maximize the agricultural use of the farmer’s land. Requiring that a barn or other agricultural building be 30 metres out from the edge of a woodlot needs to be reconsidered. Agricultural viability is a primary vision and goal of the Plan. OFA believes that efficient use of lands that comprise a farm contributes to farm viability. OFA recommends that Policy 3.2.5.7 be amended to allow agricultural buildings and structures to be located as close as possible to the drip line of a woodlot. With respect to the “natural self-sustaining vegetation” requirement, OFA supports the provision that “natural self-sustaining vegetation” not be required for lands used for agricultural purposes.

Policy 3.2.5.8 (Page 27-28) sets out a number of criteria for waiving requirements to complete a natural heritage or hydrologic evaluation. Six criteria are set out, and all six must be met for waiving the natural heritage or hydrologic evaluation. Policy 3.2.5.8.(a) speaks to the 30 metre vegetation protection zone. As noted with respect to Policy 3.2.5.7, OFA recommends that the 30 metre zone not apply to agricultural buildings and structures adjacent to woodlots.

Policy 3.2.5.8.(c) speaks to locating agricultural buildings or structures as far as possible from key natural heritage or hydrologic features, and within the cluster of existing buildings. The Minimum Distance Separation Formulae (MDS) can dictate that the location of new farm building be outside the cluster of existing buildings in order to comply with the formulas calculated separation distance. “As far as possible” from a key feature will lead to inefficient use of land. Policy 3.2.5.8.(c) needs to reflect these realities. OFA recommends deleting “clustered with existing buildings and structures” and “to the maximum extent possible” in relation to all agricultural buildings and structures.

Policy 3.2.5.8.(f) speaks to additional considerations. Farmers do not undertake the construction of unnecessary buildings. Building size and scale are dictated by end use. None of these four



factors should apply to agricultural buildings and structures. OFA recommends that agricultural buildings and structures be exempt from Policy 3.2.5.8.(f).

Policy 3.2.5.9 (Page 28) would limit this provision solely to the Niagara Peninsula Specialty Crop Area. The Greenbelt Plan recognizes two specialty crops areas within its boundaries, the Niagara Peninsula Specialty Crop Area and the Holland Marsh Specialty Crop Area, and purports to support agricultural viability not only in its Specialty Crop Areas but also across the agricultural lands within Protected Countryside. As worded, this inequitable policy is unacceptable. OFA demands that Policy 3.2.5.9 apply equally to both the Greenbelt Plan's Specialty Crop Areas and also to its agricultural lands within the Plan's Protected Countryside.

Three of the four conditions attached to Policy 3.2.5.9 are unduly excessive. We have already noted our concerns with Policy 3.2.5.8. Carrying the requirements in 3.2.5.8 into 3.2.5.9.(a) is unacceptable. 3.2.5.9 (b) is unnecessary.

Policy 3.2.5.9.(c) establishes a vegetation protection setback of 15 metres (50') for "agricultural swales, roadside ditches or municipal drains". The existing 30 metre vegetation protection zone unduly impacts the viability of the small farms that predominate in specialty crop areas. OFA recommends a maximum vegetation protection setback of 3 metres (10 ft.) as sufficient to ensure an agricultural building or structure would not negatively impact an agricultural swale, roadside ditch or municipal drain. Also of great importance is establishing a clear definition for these terms. At least one municipality intends to view all agricultural swales, roadside ditches and municipal drains as key hydrologic features. This interpretation is unacceptable. How will the Ministry of Municipal Affairs address these situations?

OFA supports Policy 3.2.5.9.(d).

In Policy 3.3.1 (Page 31-32), the language in the second paragraph on page 32 should be stronger, to ensure that any and all entry onto privately-owned property is always at the discretion of the property owner. Furthermore this policy should list specific methods for preventing trespass, as noted in the third paragraph on page 32.

Policy 3.3.3.4 (a) (Page 33) should add protection of farm crossings as an integral part of preserving abandoned railway right-of-way corridors. These corridors were imposed on the landscape after European settlement. Farm crossings were provided in recognition that rail lines cut farm properties in two, rendering a portion of the property only accessible by means of a farm crossing. The fact that the right-of-way is no longer used for a railway in no way removes the farmer's need for that farm crossing. The right-of-way still cuts the farm in two, and without the crossing, a portion of the property remains inaccessible. Under policy 3.3.3.4.(f); the compatibility with agriculture must be clearly outlined.

A clear explanation is needed for how the possible settlement area expansions in 3.4 (Settlement Area Policies, Page 34-37) will not reduce the Plan's protected area as set out in the Greenbelt Act section 2(4).

The Plan must identify how avoiding specialty crop and other prime agricultural areas in Policy 4.2.1.2.(f) (Page 42-43) relates to the expansion of natural gas, electricity or municipal water into the specialty crop and prime agricultural areas in the Protected Countryside. The ongoing ability of agricultural operations in the Protected Countryside to remain viable and competitive is tied to their ability to access these services. In their absence, agricultural operations will stagnate, and eventually shut down. We acknowledge the benefits for agricultural land

protection from the Greenbelt Act and the Greenbelt Plan. Nevertheless, the ability of agricultural operations in the Protected Countryside to remain viable and competitive with agricultural operations elsewhere cannot be compromised. We believe the agricultural land protection policies in the Greenbelt Act and the Greenbelt Plan are sufficient protection from development of these lands. Artificial “protection”, by barring the extension of critical services such as natural gas, electricity or municipal water, is detrimental and unnecessary. OFA demands that any and all prohibitions against extension of natural gas, electricity or municipal water into the Protected Countryside be removed from the Greenbelt Plan.

Policy 4.2.1.2.(g) requires an Agricultural Impact Assessment (AIA) for infrastructure expansion that simply crosses through specialty crop or other prime agricultural areas. OFA believes this is a necessary and welcome requirement. However, if the infrastructure expansion is for natural gas, electricity or municipal water to service farm operations and farmers, then we believe an AIA is unnecessary. OFA recommends Policy 4.2.1.2.(g) be amended to reflect this.

Policy 4.3.2.8 (Page 48) on non-renewable resources directs aggregate operators to “consider and provide public access to former aggregate sites upon final rehabilitation”. This policy is detrimental on many fronts. It presupposes that rehabilitation of former aggregate sites will be to a non-agricultural land use. It potentially creates a patchwork of publically accessible lands, with no consideration for who will operate these lands, how they will be managed, including managing weeds, invasive species and wildlife populations. OFA recommends that language be added to clarify that 4.3.2.8 does not apply to sites rehabilitated back to an agricultural end use.

On Growing the Greenbelt, how do municipal requests (5.7.1.4; page 61) relate to a provincially-led process in 5.7.1.1 and 5.7.1.2? When and by how much will the Greenbelt grow, and how will public involvement be ensured?

The OFA has concerns with some of the Definitions (Pages 65-79).

Major development is defined as including any building with a ground floor area of 500 m<sup>2</sup> (5,382 ft<sup>2</sup> or approximately 50' x 108'). This is **not** a large farm building. Modern farm buildings are several orders of magnitude larger than the 500 m<sup>2</sup> cited here. The Greenbelt Plan's Protected Countryside is intended to promote agricultural uses and viability. The major development provisions and definition are not found in the current Greenbelt Plan. OFA opposes their inclusion in the draft Greenbelt Plan. This restriction serves to deter agricultural growth and development in the Protected Countryside. Enabling farmers in the Protected Countryside to build farm buildings that serve their farm operation, without unnecessary building size limitations, will not create a free for all. These buildings will still be required to meet applicable municipal zoning and set back requirements. Livestock buildings will still be required to meet Minimum Distance Separation (MDS) requirements. And for agriculture-related and on-farm diversified uses, the Ministry of Agriculture, Food and Rural Affairs' *Guidelines of Permitted Uses in Ontario's Prime Agricultural Areas* will serve to limit building size. OFA recommends that the definition of major development and associated policies exclude all farm buildings and structures.

The definition in the draft Greenbelt Plan for a “*residence surplus to a farm operation*” uses wording that differs from the 2014 PPS. Countless submission on the first phase of The Coordinated Review, along with the Recommendations of the Advisory Panel on the Coordinated Review of the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan called for widespread use of common language and definitions from the 2014 PPS. In this instance, the

wording **is not** the same as in the 2014 PPS. The OFA demands the definition in the draft Greenbelt Plan for a *“residence surplus to a farm operation”* be verbatim from the 2014 PPS.

The definition of *“wetlands”* adds a third paragraph that is not found in the 2014 PPS. We see no added value to inclusion of this paragraph. As already noted, one outcome of this review was to utilize common language and definitions from the 2014 PPS. OFA demands that the definition of *“wetlands”* in the Greenbelt Plan mirror the definition in the 2014 PPS.

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

OFA is disappointed in the draft Oak Ridges Moraine Conservation Plan (ORMCP) for a number of reasons.

Firstly, we believe that the Plan should be converted from a regulation under the Oak Ridges Moraine Conservation Act to a land use plan, as are Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Niagara Escarpment Plan. There is no reason for perpetuating this anomaly.

In the Definitions in the draft Oak Ridges Moraine Conservation Plan;

The draft Plan retains *“home business”*, *“home industry”* and *“home occupation”*, but it is not explained how these terms relate to *“agriculture-related uses”*, *“on-farm diversified uses”* and *“agri-tourism uses”*. OFA requests clarification in the Plan when and how these terms will apply.

*“Major development”* is defined as including a building with a ground floor area of 500 m<sup>2</sup> (5,382 ft<sup>2</sup> or approximately 50' x 108'). This is **not** a large farm building. Modern farm buildings are several orders of magnitude larger than the 500 m<sup>2</sup> cited here. The Oak Ridges Moraine Conservation Plan is intended to promote agricultural uses and viability. This restriction serves to deter agricultural growth and development. Enabling farmers to build farm buildings that serve their farm operation, without unnecessary building size limits will not create a free for all. These buildings will still be required to meet applicable municipal zoning and set back requirements. Livestock buildings will still be required to meet Minimum Distance Separation (MDS) requirements. And for agriculture-related and on-farm diversified uses, the Ministry of Agriculture, Food and Rural Affairs' *Guidelines of Permitted Uses in Ontario's Prime Agricultural Areas* will serve to limit building size. OFA recommends that the definition of *“major development”*, and associated policies in the draft Oak Ridges Moraine Conservation Plan specifically exclude farm buildings and structures.

The definitions of both *“prime agricultural areas”* and *“prime agricultural lands”* differ significantly from 2014 PPS. OFA recommends these definitions mirror their counterparts in the 2014 PPS.

The draft Oak Ridges Moraine Conservation Plan has no definition of *“residence surplus to a farming operation”*, *“rural areas”* or *“rural lands”*. OFA recommends adding these definitions from the 2014 PPS.

The definition of *“wetlands”* in paragraph (c) of the draft Oak Ridges Moraine Conservation Plan contains additional language not found in the 2014 PPS, as is the case with the Greenbelt Plan. OFA recommends the ORMCP *“wetland”* definition mirrors the 2014 PPS.

*“Existing”*, in an agricultural context (pages 24-25) can be construed as barring changes to crops grown or livestock raised, or even to the methodology used by the farmer to grow



particular crops, or raise livestock. For farming to flourish, it must be able to adapt to changing market conditions as well as changing customer preferences and changing farming practices. Agricultural activities need to be viewed in their broadest context. The draft Oak Ridges Moraine Conservation Plan should contain language that clearly enunciates that nothing in the Plan is intended to limit the ability of a farmer to changes aspects of his or her farming operation; crops grown, livestock raised or production methodologies, as long as the new activities fall within the broad definitions of *“agricultural uses”*, and *“animal agriculture”*. The 2014 PPS revised its wording and deleted “existing” in reference to agricultural uses. OFA recommends that the Oak Ridges Moraine Conservation Plan similarly delete “existing” in reference to agricultural uses.

### **Natural Core Area Policies (Page 29-30):**

While a relatively broad range of land uses are recognized in the Natural Core Area, *“agriculture-related uses”* and *“agri-tourism uses”* are not among them. We view this omission as unfair, given that *“home businesses”*, *“home industries”* and *“bed and breakfast establishments”* are all permitted here. OFA strongly recommends that *“agriculture-related uses”* and *“agri-tourism uses”* also be permitted within the Natural Core Areas.

### **Countryside Page 32-33:**

In the draft ORMCP, *“agriculture-related uses”* are limited to the prime agriculture areas of the Countryside. We oppose this provision. All farm operations, whether they are situated on prime agricultural land or rural land, should be able to take advantage of opportunities to pursue *“agriculture-related uses”*. OFA recommends removing the limitation for *“agriculture-related uses”* to only prime agricultural areas.

There is no explanation for how *“small-scale commercial”* and *“industrial uses”* (page 33; number 14) differs from *“agriculture-related uses”*. OFA requests clarification of the application of these terms.

The Plan proposes large setbacks from key Natural Heritage features, woodlots in particular, which can lead to inefficient use of farmland. In the case of woodlots and agricultural buildings, siting these structures close to the edge of the woodlot maximizes agricultural use of the farmer’s land. Requiring that a barn or other agricultural building be 30 metres out from the edge of a woodlot needs to be reconsidered. Farm viability is jeopardized. From OFA’s perspective, efficient use of the lands that comprise a farm contributes to farm viability. OFA recommends the table be amended to allow agricultural buildings and structures to be located as close as possible to the drip line of any woodlot.

The section on Wellhead Protection (section 28 (2) 2 and 3; Page 49) is unclear and unwarranted. How is *“personal use”* or *“family use”*, in the case of both animal agriculture and the storage of agricultural equipment determined? Farmers are businesspeople and farm profitability and viability are requisites. Existing legislation and regulations already addresses these matters.

There is no requirement in the Lot Creation policies, 32. (1) (Page 58) that surplus farm dwelling severances be *“habitable”*. *“Habitable”* was a positive addition to the 2014 PPS, ensuring that the surplus dwelling provisions were not abused. OFA requests that the word *“habitable”* be added to 32. (1)1. before *“residential dwelling”*. OFA also recommends that provisions be made to enable severances for *“agriculture-related uses”*, as none are currently in place.

The policy on Mineral Aggregates (Page 59 35(1) (b) states that rehabilitation on non-prime agricultural lands is not required to return an agricultural state, but rather to natural self-sustaining vegetation. OFA believes that all aggregate sites where agriculture was the pre-extraction land use should be rehabilitated back to an agricultural use once extraction has been completed, provided that the surrounding uses are also agriculture. Ontario continues to lose agricultural land to non-agricultural uses at an unsustainable rate. To further exacerbate these losses through planning policies such as these is unacceptable. OFA demands that rehabilitation of aggregate sites back to an agricultural use be based on the sites pre-extraction land use and agricultural uses adjacent to the site.

Trails system policies, such as 39(2)(c) (Page 63-64) excludes the use of unopened road allowances. From our perspective, unopened road allowances would seem to provide an ideal location for a trail as they present minimal interference with private property. In addition, the concluding phrase, *“as much as possible”* is vague.

Abandoned or former rail rights-of-way are often used as the basis for recreational trails. Although Policy 39(3) does not specifically reference abandoned railway rights-of-way, it does reference fencing. We believe that 39(3) should also formally recognize farm crossings of former rail rights-of-way, and ensure that farmers who depend on their farm crossing to access otherwise landlocked portions of their farm are guaranteed that trail development will never jeopardize their continued rights to use these crossings. Lastly, the draft Oak Ridges Moraine Conservation Plan does not mention crossings where trails cross through agricultural lands. OFA recommends that the trails policies in the draft Oak Ridges Moraine Conservation Plan include provisions ensuring that farm crossings on former rail rights-of-way will continue to be respected and recognized, and that where trails cross active agricultural operations, farmers will enjoy full and free rights to cross these trails.

It is unclear how the *“small-scale commercial”*, *“industrial”* and *“institutional use”* policies on page 64 relate to agriculture-related uses and on-farm diversified uses. For agricultural lands, OFA advocates that the only terms used be *“agriculture-related uses”* and *“on-farm diversified uses”*. To retain the *“small-scale commercial”*, *“industrial”* and *“institutional use”* terms adds unnecessary confusion, and will lead to poor implementation outcomes.

With respect to the Greenbelt Plan, OFA has been clear that the growth and development of agriculture requires access to a range of infrastructure; principally natural gas, three-phase power and municipal water. In the proposed Infrastructure Policies (Page 65-68), we question how these policies would enable the expansion of natural gas distribution networks throughout unserved areas of the ORMCP. OFA recommends that the ORMCP facilitates the expansion of natural gas, three-phase power and municipal water to farm operations and farmers throughout the Plan's area.

We previously noted our opposition to the proposed definition of *“major development”*, because a farm building with a ground floor area of 500 m<sup>2</sup> (5,382 ft<sup>2</sup> or approximately 50' x 108') is not, in relation to farming, a large building. Under the policies for Stormwater Management (Page 70) a farm building with a floor area of 500 m<sup>2</sup> would trigger a stormwater management plan. Stormwater Management makes sense in an urban context, where there is widespread surface hardening, leaving minimal area where rainwater and snowmelt can infiltrate. In rural and agricultural areas, the opposite is true. The overwhelming majority of the surface is not hardened, and is therefore readily available for infiltration. Requiring Stormwater Management in a rural or agricultural area is not sensible. OFA recommends that the definition of major

development specifically exclude farm buildings and structures within the Plan's Countryside area.

**Proposed amendment to the Greenbelt Area boundary regulation (EBR 012-7198)**

OFA does not oppose the boundary changes proposed under this posting. We support the addition of the 21 urban river valley areas. Furthermore, we accept the proposed additions to the Plan in Niagara and Hamilton Regions, along with the areas to be removed in Hamilton, Durham and York Regions.

The Ontario Federation of Agriculture welcomes this opportunity to provide its perspective on the Proposed Growth Plan for the Greater Golden Horseshoe, the Proposed Greenbelt Plan, the Proposed Oak Ridges Moraine Conservation Plan and the Proposed amendment to the Greenbelt Area boundary regulation. We look forward to the incorporation of our recommendations into the final versions of these plans.

Sincerely,



Don McCabe  
President

DM/pj

cc: Hon. Bill Mauro; Minister of Municipal Affairs  
Hon. Jeff Leal; Minister of Agriculture, Food and Rural Affairs  
Hon. Kathryn McGarry; Minister of Natural Resources and Forestry  
OFA Board of Directors