



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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March 26, 2018

Ms. Aiden Grove-White, Manager  
Ontario Growth Secretariat  
Partnerships and Consultation Branch  
Ministry of Municipal Affairs  
c/o Business Management Division  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON  
M5G 1Z3

Dear Ms. Grove-White;

**RE: EBR Registry No. 013-2488 - Proposed Modifications to O.Reg. 316/06 (Transition Matters – Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 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 is a strong advocate for the protection of Ontario's farmlands for their long-term ability to produce food, fibre and fuel, not only for Ontario's growing population, but also for consumers beyond our borders. In that context, we reiterate our continued concern over Ontario's shrinking agricultural land base. Based on census data from the 2006 and 2011 censuses, Ontario lost almost 260,000 ha (636,000 acres) over that five-year period, or 350 acres/day. The rate of loss has slowed slightly based on the 2011 and 2016 censuses, which saw agricultural land losses of 319,700 acres, or 175 acres/day. We view this rate of loss as unacceptable and unsustainable.

Should the projected scale of growth cited on page 1 of EBR Consultation Document 013-1661, "Protecting Water For Future Generations; Growing the Greenbelt in the Outer Ring" continue (by 50% over the next 25 years), in our submission we advocated that the Province reopen the Growth Plan for the Greater Golden Horseshoe to incorporate the following requirements in it;

- i. Fixed, permanent urban boundaries for all settlement areas throughout the Growth Plan area,
- ii. Convert the urban intensification and greenfield development targets to mandatory requirements that are not open to appeal,
- iii. Adopt a broader, province-wide policy to distribute urban growth more uniformly across all Ontario urban areas with the capacity to accommodate growth; i.e. those with adequate development lands within their existing urban boundaries, serviced by municipal sewers, water, roads and transportation infrastructure, and

- iv. Align the Natural Heritage System policies of the Growth Plan for the Greater Golden Horseshoe with those in the Provincial Policy Statement.

With an eye to the effective implementation of the Land Needs Assessment for the Greater Golden Horseshoe, OFA strongly recommends that the above four points be an integral part of the Proposed Modifications to O.Reg. 316/06.

The Ontario Federation of Agriculture welcomes this opportunity to provide its perspective on Proposed Modifications to O.Reg. 316/06 (Transition Matters – Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe.

Sincerely,



Keith Currie  
President

KC/pj

cc: The Honourable Bill Mauro, Minister of Municipal Affairs  
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors