



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3  
Tel: (519) 821-8883 • Fax: (519) 821-8810 • [www.ofa.on.ca](http://www.ofa.on.ca)

May 7, 2018

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

Dear Ms. Grove-White;

**RE: EBR Registry No. 013-2359 Draft Guidance to Support Implementation of the Growth Plan for the Greater Golden Horseshoe, 2017: Application of the Intensification and Density Targets & the Municipal Comprehensive Review Process**

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.

Well-formulated land use planning, informed by clear guidance material 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.

Some years ago, the Middlesex Federation of Agriculture posted the following message on a billboard. We believe it is worthwhile to reflect on its message at this time;

**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 mere 5%, a lesser proportion comprises our most productive 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 32 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 2016 census shows a continuing decline in the area being farmed since the 2011 census. Ontario farms encompass 12.3 million acres, down 319,700 acres over the previous census. Regardless the reason, urban expansion, or aggregate extraction, or both, Ontario cannot continue to sustain an annual loss of 63,940 acres per year while maintaining our ability to produce a higher volume food, fibre and fuel.

Putting 63,940 acres per year in different terms, that's 175 acres/day. If we continue to sustain losses of agricultural land at that rate, achieving the Premier's challenge to double agriculture's annual growth rate and create 120,000 jobs by 2020 will be extremely difficult, if not outright impossible to achieve.

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.

OFA believes that that the continued focus on the Greater Golden Horseshoe (GGH) as the principle recipient of Ontario's population and employment growth is short sighted, and ultimately unsustainable. Rather, we advocate a policy of distributing growth and development across all Ontario municipalities, i.e. Producing Prosperity in Ontario. All Ontario municipalities have undeveloped lands within their urban boundaries. Distributing a portion of Ontario's population and employment growth across these municipalities will bolster their viability. Distributing growth and development across all of Ontario can address home affordability, reduce greenhouse gas emissions and keep smaller urban centers vibrant, and desirable places to live, work and play, the essence of the Growth Plan's goal of complete communities.

OFA also reiterates our longstanding land use planning demands;

- i. fixed, permanent urban boundaries for all municipalities, not only those subject to the Greenbelt Plan, Growth Plan for the GGH, Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan,
- ii. convert the density and intensification targets in the Growth Plan for the GGH into mandatory density and intensification requirements, and
- iii. end the policy of phasing in the density and intensification targets, which only perpetuates planning policies that have brought us the urban sprawl and congested roads that the GGH faces today.

OFA makes the following specific comments on the Draft Guidance to Support the Implementation of the Growth Plan for the GGH, 2017 the Municipal Comprehensive Review Process:

Section 3.1 omits reference to an Agricultural Impact Assessment (AIA) in the context of settlement boundary expansions and infrastructure. As an AIA is mandatory for settlement boundary expansions and infrastructure in the area subject to the Growth Plan for the GGH, this omission is troubling. OFA recommends that Section 3.1 include a clear notation that an AIA is mandatory for a settlement boundary expansion in the area subject to the Growth Plan for the GGH. We do note that AIAs are specifically referenced in Section 3.5.2, but there is no parallel section on infrastructure. OFA recommends that the role of AIAs for infrastructure projects should be included in this document.

Furthermore, following section 3.7.2 (Agricultural System Mapping), there should be a brief outline of AIAs in the context of settlement boundary expansions, noting the policies in the Growth Plan for the GGH that refer to AIAs, the circumstances when and AIA is required and a link to OMAFRA's AIA Guidance Document. Section 4.1.2 should also include a reference to AIAs.

The tables on pages 39-42 omits a reference to Agricultural System policies in the Growth Plan for the GGH. A reference should be included.

The Ontario Federation of Agriculture welcomes this opportunity to provide its perspective on Draft Guidance to Support Implementation of the Growth Plan for the GGH, 2017: Application of the Intensification and Density Targets & the Municipal Comprehensive Review Process. We look forward to the incorporation of our recommendations and suggestions into the final version.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Currie', written in a cursive style.

Keith Currie  
President

KC/pj

cc: The Honourable Bill Mauro, Minister of Municipal Affairs  
The Honourable Nathalie Des Rosiers, Minister of Natural Resources and Forestry  
The Honourable Jeff Leal, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors