

November 20, 2018

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
17th Floor, 777 Bay Street  
Toronto, ON  
M5G 2E5

Dear Minister Clark,

**RE: Aligning Government Priorities with Growth Planning in the Greater Golden Horseshoe**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. Agriculture and agri-food businesses are leading economic drivers for the province; contributing nearly \$40 billion in GDP and employing over 822,000 Ontarians.

OFA welcomes this opportunity to provide our perspective on Growth Planning and Implementation in the Greater Golden Horseshoe.

Minister Clark, we appreciated you championing our *Producing Prosperity in Ontario* campaign during the provincial election. The Province's priorities to increase housing supply and affordability, create jobs, reduce red tape, attract new investments, and build strategic partnerships align exceptionally well with our proposed plan, and OFA has solutions that will mutually achieve our objectives.

**1. Curb Urban Sprawl and Low-Density Development**

The current pattern of growth is unsustainable. Less than 5% of Ontario's land base can support any agricultural production, yet we continue to lose valuable farmland to development. From 2011 to 2016, the Census of Agriculture indicated that Ontario lost 319,700 acres of Ontario farmland. That's 175 acres of farmland per day. If our province plans to continue to grow and prosper, we must also have a plan to protect our ability to produce food, fibre and fuel for the people of Ontario and beyond.

*Solution:* Implement fixed, permanent urban boundaries.

*Solution:* Implement mandatory greenfield and intensification density requirements (including moving up the timeline and increasing these densities).

These solutions will *Reduce Red Tape* and *Attract Economic Investments*. With a clearer understanding of where development can/cannot occur, development that meets the requirements will be easily streamlined through, while those that do not meet the goals will not be open to interpretation or lengthy reviews and appeals. Agriculture and agri-food businesses will

---

be able to invest in their operations and diversify their products with confidence that their land will remain a viable agricultural operation into the future.

## **2. Clarify and Refine the Natural Heritage System (NHS)**

Inaccurate mapping and subjective interpretation leads to lengthy and expensive reviews and analysis. Improving the accuracy of the NHS map and clearer language will lead to smarter, faster business decisions. The 30 metre (100 ft.) vegetation protection zone or buffer around natural heritage features, specifically woodlots, leads to inefficient use of agricultural land.

*Solution:* Groundtruthing must be done to improve accuracy and implementation.

*Solution:* Linkages and corridors are misunderstood and vary in interpretation. It needs to be clearer that the Natural Heritage System is an overlay.

*Solution:* Enabling farmers to locate farm buildings close to the edge of woodlots promotes efficient use of our finite agricultural lands.

These solutions will *Reduce Red Tape*. Businesses will have clearer direction on where development can/cannot occur, and the NHS maps will reflect the current landscape.

## **3. Align Language in Provincial Plans with Provincial Policy Statement**

A lack of consistency across the Plans leads to confusion for businesses and subjective interpretation by the many stakeholders involved. This confusion leads to delayed business decisions and expensive studies. This lack of consistency is predominately in the Oak Ridges Moraine and the Niagara Escarpment Plans.

*Solution:* Specific language modifications are provided in the attached appendix.

This solution will *Reduce Red Tape*. Businesses should not have to review countless policies and paperwork before making each decision. The language in the Plans should be simplified to reflect the definitions and interpretations already provided by the Provincial Policy Statement.

## **4. Simplify Oversight of the Niagara Escarpment Plan**

It is confusing enough to navigate multiple provincial plans, but multiple governing bodies adds another layer of bureaucracy. Moving the ministerial responsibility for the Niagara Escarpment Plan to the Ministry of Municipal Affairs and Housing, alongside other Provincial Plans (e.g. Greenbelt Plan) will simplify the process.

*Solution:* Oversight of the Niagara Escarpment Plan should be moved from the Ministry of Natural Resources and Forestry (MNRF) to the Ministry of Municipal Affairs and Housing (MMAH).

These solutions will *Reduce Red Tape*. Businesses should not need to contact multiple ministries and multiple governing bodies for similar provincial plans. The Niagara Escarpment Commission is an additional level of red tape that can be achieved at the municipal and provincial level without additional oversight.

## **5. Stimulate Growth Beyond the Greater Golden Horseshoe**

While it is projected that most of Ontario's growth will occur in the Greater Golden Horseshoe (GGH), the government can make a concerted effort to focus its attention beyond. All of Ontario

---

municipalities have undeveloped lands within their urban boundaries. Distributing a portion of Ontario's employment growth across these municipalities will stimulate local economies, reduce greenhouse gas emissions from long commutes, and contribute to the vision of complete communities outlined in the Growth Plan.

*Solution:* Target smaller communities for infrastructure and economic investments to distribute economic development, reduce congestion and growth pressures in the GTA.

This solution will *Increase Housing Supply, Create Jobs, Attract Economic Investments* and *Build Strategic Partnerships*. The GGH has many growth pressures such as crumbling infrastructure and skyrocketing housing prices that will continue to make life unaffordable and challenging for the average resident, not to mention the pressure of developing agricultural land; Ontario's most important resource. Distributing economic development will reduce growth pressures while improving lives and creating opportunities for *all* Ontarians.

Summary of Recommendations:

1. Curb urban sprawl and low-density development by implementing fixed, permanent urban boundaries and mandatory greenfield and intensification density requirements.
2. Clarify and refine the Natural Heritage System by groundtruthing and providing clearer language that the Natural Heritage System, particularly linkages, corridors and buffers should be interpreted as an overlay.
3. Align language in provincial plans with Provincial Policy Statement using the suggestions provided in the appendix.
4. Simplify oversight of the Niagara Escarpment Plan by moving its governance under the Ministry of Municipal Affairs and Housing alongside the other provincial plans and dissolve the Niagara Escarpment Commission.
5. Stimulate growth beyond the Greater Golden Horseshoe by targeting smaller communities for infrastructure and investment to distribute economic development, reduce congestion and growth pressures in the GTA.

The agri-food sector is the cornerstone of economic prosperity in our province. We look forward to working with you to promote smart growth across the Greater Golden Horseshoe and beyond, and we appreciate your commitment to the vital food and farming businesses that drive our economy forward.

Sincerely,



Keith Currie  
President

cc: Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
Hon. John Yakabuski, Minister of Natural Resources and Forestry  
Hon. Monty McNaughton, Minister of Infrastructure  
OFA Board of Directors

---

## Appendix I: Align Language to Improve Clarity, Support Agri-Food Growth and Reduce Red Tape

### **Places to Grow: Growth Plan for the Greater Golden Horseshoe (2017)**

2.2 (p. 13): There are no lot creation policies in the Growth Plan. It should clearly state that plan users are to rely on the Provincial Policy Statement (2014 PPS) to improve clarity.

4.2.4.4 (p. 44-45): Policies for lands adjacent to key natural heritage features - particularly (b) and (c) - are more restrictive than the parallel policies in the Greenbelt Plan. The Greater Golden Horseshoe Growth Plan's policies for lands adjacent to key natural heritage features should parallel those in the Greenbelt Plan.

### **Greenbelt Plan (2017)**

3.1.2.1 Specialty Crop and 3.1.3.1 Prime Agricultural Areas (p. 16-17): The wording "normal farm practices and a full range of agricultural, agriculture-related and on-farm diversified uses are supported and permitted" is used. In the Provincial Policy Statement, Policy 2.3.3.2 states, "in prime agricultural areas, all types, sizes and intensities of agricultural uses ...". The 2014 PPS wording should be used in the Greenbelt Plan.

Definition – Wetlands (p. 75): 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. The definition of "wetlands" in the Greenbelt Plan should mirror the definition in the 2014 PPS.

### **Oak Ridges Moraine Conservation Plan (ORMCP, 2017)**

The ORMCP should be converted from a *regulation* to a land use *plan*. The Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Niagara Escarpment Plan are all plans; there is no reason to perpetuate this anomaly that adds a layer of confusion and red tape.

Definitions – "prime agricultural area" and "prime agricultural land" (p. 20): Both definitions provided differ significantly from 2014 PPS. These definitions should mirror their counterparts in the 2014 PPS.

Definitions – There are no definitions for "residence surplus to a farming operation", "rural areas" or "rural lands". These definitions should be added from the 2014 PPS.

Definition – The definition of "*wetlands*" (p. 23) Paragraph (c) contains additional language not found in the 2014 PPS, as is the case with the Greenbelt Plan. The ORMCP "*wetland*" definition should mirror the 2014 PPS.

Part IV Specific Land Use Policies – 40. Small-Scale Commercial, Industrial and Institutional Uses (p. 62). It is unclear how the "*small-scale commercial*", "*industrial*" and "*institutional use*" policies relate to agriculture-related uses and on-farm diversified uses. For agricultural lands, only the terms "*agriculture-related uses*" and "*on-farm diversified uses*" should be used to avoid unnecessary confusion and poor implementation outcomes.

### **Niagara Escarpment Plan (2017)**

While both the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan have made substantial improvements in the adoption of common language and definitions from the 2014 PPS, the same cannot be said of the Niagara Escarpment Plan. Minimal language and definitions from the 2014 PPS are used. The lack of effort in incorporating common language and definitions is disappointing, and one that must be rectified.

---

1.3.3.1 Permitted Uses in the Escarpment Natural Area (p. 15) Only existing agricultural uses, agriculture-related uses and on-farm diversified uses are permitted. Changes to Section 2.1 of the 2014 PPS dropped “existing” from the statement. Agriculture is a constantly changing activity. New crops and species of livestock are grown or raised, and new practices are adopted as new research and technologies become available. Using the phrase “existing uses” prevents adoption of new farming methods, crops or livestock, putting farmers at a competitive disadvantage to other farmers in the Niagara Escarpment Plan and beyond. The word “existing” should be dropped in relation to agricultural uses, agriculture-related uses and on-farm diversified uses carried on within the Escarpment Natural Area.

1.5.3 Permitted Uses in the Escarpment Rural Area (p. 26): Both agriculture-related and on-farm diversified uses as well as home occupations and home industries are set out as permitted uses. The continued presence of duplicate terminology will, from our perspective, lead to confusion between property owners, municipalities and the Niagara Escarpment Commission, as they endeavour to apply the Plan’s policies. The provincial government supported the adoption of new terminology, such as on-farm diversified uses and agriculture-related uses, with the expectation that their use would support agriculture and the ability of individual farmers to make their farmers more financially-secure in the longer term. The Niagara Escarpment Commission’s unwillingness to similarly adopt new terminology is troubling. The terminology and policies related to agricultural areas and properties in the 2014 PPS should be adopted in the Niagara Escarpment Plan to improve clarity, save time, and reduce red tape.

Development, as defined in Niagara Escarpment Planning and Development Act, is inconsistent with development under the 2014 PPS, the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe, and the Oak Ridges Moraine Conservation Plan. The use of common terms in different ways leads to confusion between property owners, municipalities and the Niagara Escarpment Commission, as they endeavour to apply the Plan’s policies. Furthermore, the Niagara Escarpment Plan requirement for property owners to obtain a development permit, in addition to a building permit, is an unnecessary, costly and time-consuming duplication.

2.8 Agriculture (p. 79): The Niagara Escarpment Plan’s “Agriculture” policies retain language and policies that are not only bizarre, but archaic. Policy 2.8.5 mandates only mobile/portable accessory dwelling units for farm help. It forces farmer employers to house their staff in mobile or portable dwelling units; something that no other farm employer in Ontario is forced to do. No other provincial plan contains such an excessively restrictive provision. This requirement discriminates against full or part-time farm help by relegating them to housing types not imposed outside the Niagara Escarpment Plan. Farm employees deserve the best housing that their employer can provide. Similar provisions that were in the Oak Ridges Moraine Conservation Plan have been dropped from the draft 2016 version. These discriminatory provisions should be dropped from the Niagara Escarpment Plan.

---

Appendix II: Provincial Plan Policy Recommendations to Improve Clarity, Save Time, Support Agri-Food Growth and Reduce Red Tape

**Places to Grow: Growth Plan for the Greater Golden Horseshoe (2017)**

2.2 (p. 13): There are no lot creation policies in the Growth Plan. It should clearly state that plan users are to rely on the Provincial Policy Statement (2014 PPS).

2.2.2.3 and 2.2.2.4 (p. 15): Intensification targets should be changed to mandatory intensification requirements to improve clarity and reduce red tape.

2.2.9 (p. 26): The policies for Rural Areas 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. Policies for Rural Areas should be amended to recognize agricultural activities to support agri-food growth.

3.2.2 (p. 33): The policies on Transportation include no reference to the use of the road system by agricultural equipment. Roads, bridges and traffic circles, in areas where farming is an ongoing activity must be designed to accommodate farm vehicles which are wider than most other vehicles (e.g. wider traffic circles, no hard 90-degree curbs). Policies referencing "*complete streets*" should ensure that the needs of farm vehicles are fully accommodated on all roadways used by farm vehicles.

3.2.5 (p. 33): In addition to infrastructure corridors, this policy should include the need for local distribution networks for natural gas, electricity and municipal water to support agri-food growth.

4.2.4.4 (p. 44-45): Policies for lands adjacent to key natural heritage features - particularly (b) and (c) - are more restrictive than the parallel policies in the Greenbelt Plan. The Greater Golden Horseshoe Growth Plan's policies for lands adjacent to key natural heritage features should parallel those in the Greenbelt Plan.

4.2.6.6, (p. 47): For policies pertaining to the Agricultural System, municipalities should not only be "encouraged" but "required" to "implement regional agri-food strategies and other approaches to sustain and enhance the agricultural system". A simple change in language will improve clarity and support agri-food growth.

4.2.6.7. (b), (p. 47): An Agricultural Impact Assessment (AIA) should be *mandatory* to assess negative impacts on the agricultural support network that agriculture and food operations rely on.

4.2.8.4 (p. 48): For lands that were in an agricultural designation before aggregate extraction (both prime agricultural lands as well as rural lands used for agriculture), rehabilitation back to an agricultural state must be a fundamental requirement to improve clarity and enable growth.

---

**Greenbelt Plan (2017)**

3.1.2.1 Specialty Crop and 3.1.3.1 Prime Agricultural Areas (p. 16-17): The wording “normal farm practices and a full range of agricultural, agriculture-related and on-farm diversified uses are supported and permitted” is used. In the Provincial Policy Statement, Policy 2.3.3.2 states, “in prime agricultural areas, all types, sizes and intensities of agricultural uses ...”. The 2014 PPS wording should be used in the Greenbelt Plan to improve clarity and save time.

3.2.5.7 (p. 26): This policy requires new buildings and structures for agricultural, agriculture-related and on-farm diversified uses to provide a 30-metre vegetation protection zone from a key natural heritage feature or key hydrologic feature. 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 m out from the edge of a woodlot is not rational. Policy 3.2.5.7 should be amended to allow agricultural buildings and structures to be located as close as possible to the drip line of a woodlot.

4.2.1.2 (f) (p. 40): The ongoing ability of agricultural operations in the Protected Countryside is tied to their ability to access natural gas, electricity and municipal water. The agricultural land protection policies in the Greenbelt Act and Greenbelt Plan are sufficient protection from development. Section (f) can be removed to ensure these critical infrastructure services, and agri-food growth, are not hindered in the Protected Countryside.

4.2.1.2 (g) (p. 40): While the OFA supports Agricultural Impact Assessments, if the infrastructure expansion is for natural gas, electricity or municipal water to service farm operations and farmers, then an AIA is unnecessary. Policy 4.2.1.2 (g) should be amended to exempt AIAs for these specific projects that will support growth.

Policy 4.3.2.8 (p. 46): For non-renewable resources, this policy directs aggregate operators to “consider and provide public access to former aggregate sites upon final rehabilitation, where appropriate”. This policy assumes that rehabilitation of former aggregate sites will *not* be to an agricultural land use. This policy should indicate it does not apply to sites rehabilitated back to an agricultural use to improve clarity.

Definition – Major Development (p. 67-68): Major development is defined as the construction of building(s) with a ground floor area of 500 m<sup>2</sup> or more. This is *very* small for a modern farm building, which should not be considered major development. Farm buildings should not be restricted as it deters progress for agricultural operations in the Protected Countryside. These buildings are still required to meet applicable municipal zoning and set back requirements, and livestock buildings will still be required to meet Minimum Distance Separation (MDS) requirements. Building sizes will still be limited for agricultural-related and on-farm diversified uses based on OMAFRA’s *Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas*. The definition of major development should exclude all farm buildings and structures to not unduly restrict agricultural operations.

Definition – Wetlands (p. 75): 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. The definition of “wetlands” in the Greenbelt Plan should mirror the definition in the 2014 PPS for clarity.

---

## Oak Ridges Moraine Conservation Plan (ORMCP, 2017)

The ORMCP should be converted from a *regulation* to a land use *plan*. The Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Niagara Escarpment Plan are all plans; there is no reason to perpetuate this anomaly that adds a layer of confusion and red tape.

Definition – Major Development (p. 18): Major development is defined as the construction of building(s) with a ground floor area of 500 m<sup>2</sup> or more. This is very small for a modern farm building which should not be considered major development. Farm buildings should not be restricted as it deters progress for agricultural operations in the Protected Countryside. These buildings are still required to meet applicable municipal zoning and set back requirements, and livestock buildings will still be required to meet Minimum Distance Separation (MDS) requirements. Building sizes will still be limited for agricultural-related and on-farm diversified uses based on OMAFRA's *Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas*. The definition of major development should exclude all farm buildings and structures.

Definitions – “prime agricultural area” and “prime agricultural land” (p. 20): Both definitions provided differ significantly from 2014 PPS. These definitions should mirror their counterparts in the 2014 PPS.

Definitions – There are no definitions for “residence surplus to a farming operation”, “rural areas” or “rural lands”. These definitions should be added from the 2014 PPS.

Definition – The definition of “*wetlands*” (p. 23) Paragraph (c) contains additional language not found in the 2014 PPS, as is the case with the Greenbelt Plan. The ORMCP “*wetland*” definition should mirror the 2014 PPS.

Part II Land Use Designations – 13. Countryside Areas (p. 30-32). Currently, “*agriculture-related uses*” are limited to the prime agriculture areas of the Countryside. 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*”. Remove the limitation for “*agriculture-related uses*” to occur only prime agricultural areas.

Part III Protecting Ecological and Hydrological Integrity – 22. Key Natural Heritage Features (p. 39). Under subsection (4), a 30-metre setback is required from key Natural Heritage features. 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 m out from the edge of a woodlot needs to be reconsidered. Subsection (4) should be amended to allow agricultural buildings and structures to be located as close as possible to the drip line of a woodlot.

Part III Protecting Ecological and Hydrological Integrity – 28. Wellhead Protection Areas (p. 47). Under Subsection (2) 2 and 3; “*personal use*” or “*family use*” cannot be distinguished for both animal agriculture and the storage of agricultural equipment. Farmers are businesspeople and farm profitability and viability are requisites. Existing legislation and regulations already address these matters and subsection (2) 2 and 3 should be removed to reduce red tape.

Part IV Specific Land Use Policies – 35. Mineral Aggregate Operations and Wayside Pits (p. 56). The policy on Mineral Aggregates states that rehabilitation on non-prime agricultural lands is not required to return an agricultural state, but rather to natural self-sustaining vegetation. For lands that were in an agricultural designation before aggregate extraction (including rural lands used for agriculture), rehabilitation back to an agricultural state must be a fundamental requirement.



---

Part IV Specific Land Use Policies – 39. Trail System (p. 61). Subsection (3) should 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.

Part IV Specific Land Use Policies – 40. Small-Scale Commercial, Industrial and Institutional Uses (p. 62). It is unclear how the “*small-scale commercial*”, “*industrial*” and “*institutional use*” policies relate to agriculture-related uses and on-farm diversified uses. For agricultural lands, only the terms “*agriculture-related uses*” and “*on-farm diversified uses*” should be used to avoid unnecessary confusion and poor implementation outcomes.

Part IV Specific Land Use Policies – 45. Stormwater Management (p. 68). 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> is not, in relation to farming, a large building. Under the policies for Stormwater Management, 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. The definition of major development (p.18) should specifically exclude farm buildings and structures within the Plan’s Countryside area.

### **Niagara Escarpment Plan (2017)**

While both the Growth Plan for the Greater Golden Horseshoe and the Greenbelt Plan have made substantial improvements in the adoption of common language and definitions from the 2014 PPS, the same cannot be said of the Niagara Escarpment Plan. Minimal language and definitions from the 2014 PPS are used. The lack of effort in incorporating common language and definitions is disappointing, and one that must be rectified.

1.3.3.1 Permitted Uses in the Escarpment Natural Area (p. 15) Only *existing* agricultural uses, agriculture-related uses and on-farm diversified uses are permitted. Changes to Section 2.1 of the 2014 PPS dropped “existing” from the statement. Agriculture is a constantly changing activity. New crops and species of livestock are grown or raised, and new practices are adopted as new research and technologies become available. Using the phrase “existing uses” prevents adoption of new farming methods, crops or livestock, putting farmers at a competitive disadvantage to other farmers in the Niagara Escarpment Plan and beyond. The word “existing” should be dropped in relation to agricultural uses, agriculture-related uses and on-farm diversified uses carried on within the Escarpment Natural Area.

1.5.3 Permitted Uses in the Escarpment Rural Area (p. 26): Both agriculture-related and on-farm diversified uses as well as home occupations and home industries are set out as permitted uses. The continued presence of duplicate terminology will, from our perspective, lead to confusion between property owners, municipalities and the Niagara Escarpment Commission, as they endeavour to apply the Plan’s policies. The provincial government supported the adoption of new terminology, such as on-farm diversified uses and agriculture-related uses, with the expectation that their use would support agriculture and the ability of individual farmers to make their farmers more financially-secure in the longer term. The Niagara Escarpment Commission’s unwillingness to similarly adopt new terminology is troubling. The terminology and policies related to agricultural areas and properties in the 2014 PPS should be adopted in the Niagara Escarpment Plan to improve clarity, save time, and reduce red tape.

---

Development, as defined in Niagara Escarpment Planning and Development Act, is inconsistent with development under the 2014 PPS, the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe, and the Oak Ridges Moraine Conservation Plan. The use of common terms in different ways leads to confusion between property owners, municipalities and the Niagara Escarpment Commission, as they endeavour to apply the Plan's policies. Furthermore, the Niagara Escarpment Plan requirement for property owners to obtain a development permit, in addition to a building permit, is an unnecessary, costly and time-consuming duplication.

22 (g) Farm Consolidations, Surplus Residences and APO Lots (p. 70): The requirement that the application for a surplus dwelling severance must occur within 2 years of the date the lands were acquired is unduly restrictive and unnecessary. The option for farmers to acquire additional farm parcels to expand their farm operation enables the farmer to sever the "surplus dwelling" from the remaining farmland and sell it, facilitating a farm's long-term viability. It also eliminates the need for farmers to be landlords. No other provincial plan contains this excessively restrictive 2-year timeframe provision and it serves no purpose in the Niagara Escarpment Plan. This provision should be removed.

2.8 Agriculture (p. 79): The Niagara Escarpment Plan's "Agriculture" policies retain language and policies that are not only bizarre, but archaic. Policy 2.8.5 mandates only mobile/portable accessory dwelling units for farm help. It forces farmer employers to house their staff in mobile or portable dwelling units; something that no other farm employer in Ontario is forced to do. No other provincial plan contains such an excessively restrictive provision. This requirement discriminates against full or part-time farm help by relegating them to housing types not imposed outside the Niagara Escarpment Plan. Farm employees deserve the best housing that their employer can provide. Similar provisions that were in the Oak Ridges Moraine Conservation Plan have been dropped from the draft 2016 version. These discriminatory provisions should be dropped from the Niagara Escarpment Plan.

### **Proposals for Guidance Documents**

Ministry of Transportation (MTO) Guidelines for Roads, Bridges and Traffic Circles: OFA recommends that MTO, in collaboration with farm equipment manufacturers, develop design guidelines for roads, bridges and traffic circles that allow for the free movement of farm vehicles.

Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) Guidelines for Facilitating Near-Urban Agriculture and Local Food: Greenbelt Plan Policy 1.2.2.1 (f) (p 5) speaks to planning for "local food" and "near-urban agriculture" but provides no details or direction. OFA recommends that OMAFRA develop and implement a suite of planning policies that actively support and facilitate near-urban agriculture and local food, such as road design features, buffering between agricultural areas and adjacent urban land uses, and improved enforcement of the Trespass to Property Act.