

February 26, 2019

Mr. Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
Business Management Division
777 Bay Street, 17th Floor
Toronto, ON
M5G 2E5

Dear Mr. O'Hara:

**RE: EBR Registry No. 013-4504 Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017,
EBR Registry No. 013-4506 Proposed Framework for Provincially Significant Employment Zones,
EBR Registry No. 013-4507 Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plans) made under the Planning Act to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017,
and
EBR Registry No. 013-4505 Proposed Modifications to O. Reg. 311/06 (Transitional Matters – Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017.**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 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.

Before we address the proposed amendments, we set out an agricultural context and perspective which OFA believes is all too often overlooked when governments consider issues related to land use planning and employment.

Agriculture and agri-food processing are Ontario's number 1 economic drivers. Ontario's agriculture and agri-food sector, from field to fork, contributes \$39.5 Billion to Ontario's economy and supports 822,483 jobs. Policymakers should not lose sight of the stark reality that less than 5% of Ontario's land base can support any form of agricultural production. Of that 5%, a lesser portion contains our most productive soils; Class 1, 2 or 3. Converting more of Ontario's finite and shrinking agricultural land to urban uses is not a solution that serves any sector of Ontario's economy.

EBR 013-4504 Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe

Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe does not support agriculture. The proposed changes promote urban sprawl, put farmland at risk, and are a counterproductive use of employment lands. OFA does **not** support making any changes to the Growth Plan for the Greater Golden Horseshoe.

The proposed amendments promote urban sprawl. Urban sprawl in the Growth Plan area is a very real threat to farmland loss. The proposed amendment in Section 1.1 to replace “urban sprawl” with “unmanaged growth” diminishes the severity that from 2011 to 2016, Ontario lost 320,000 acres of farmland area. That equates to 175 acres/day. If we lose agricultural land to development, it is gone forever. This means a loss of rural businesses in our communities; a lost opportunity to produce more products through innovation and technological advancements; a loss of employment from on-farm food processing and agritourism; and a loss for rural communities that a succession of Ontario Governments promised to support.

Land supply is not the problem. Three decades of provincial planning have mandated that municipalities have a minimum of a 20-year supply of developable lands within their urban boundaries. Ontario’s “provincial plans”, including the Growth Plan for the Greater Golden Horseshoe, are built upon this principle. Land assessment studies repeatedly demonstrate the availability of land for urban growth across the Greater Golden Horseshoe as well as beyond, sufficient to accommodate projected growth to at least 2041.

Weakening the designated greenfield area density targets will only increase low-density sprawl and encroachment on neighbouring farmland. OFA urges the provincial government to impose **increased and mandatory** densities for both intensification and designated greenfield areas. Higher greenfield densities will lessen the demand to convert agricultural lands to non-agricultural uses. There should either be mandatory compliance or strict penalties for municipalities that choose to ignore greenfield density targets.

The proposed amendments put farmland at risk. The proposed amendments would allow municipalities to expand their urban boundaries into farmland outside of a municipal comprehensive review. This means more time consulting with the public, and community organizations such as local farm organizations will have to be tirelessly vigilant to protect farmland from development. Although a clear need has not been demonstrated for more employment lands, this proposal will allow development to be prioritized over farmland protection.

The proposed amendments are a counterproductive use of employment lands. The proposed amendments allow some employment lands to be converted to residential and other uses, implying that they are surplus. The Ontario Government has asserted that we do not have enough employment lands, so this runs counter to their argument that there are not enough employment lands available.

While it is important to provide an adequate supply of housing and employment opportunities, provincial policies that threaten our agriculture and agri-food sector’s ability to prosper and grow are short-sighted and counterproductive.

OFA offers our perspective on the six broad categories set out in the proposed amendments.

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1. **Employment Planning:** A modernized employment area designation system that ensures lands used for employment are appropriately protected while unlocking land for residential development.
 - a) Create provincially significant employment zones (PSEZ) for greater protections of important employment sites while allowing municipalities to re-designate some existing employment areas to mixed use before their next municipal comprehensive review.

OFA could see the value in creating provincially significant employment zones (PSEZ), however, there are many questions left unanswered. These questions are described in detail in the comments on EBR 013-4506 provided below. We do not support allowing municipalities to re-designate some existing employment areas to mixed use before their next municipal comprehensive review. Thus, if we do not allow municipalities to re-designate their employment areas, the apparent need for the PSEZs is limited.

- b) Ensure municipalities retain space for a similar number of jobs when redeveloping employment lands outside of employment areas

OFA support this proposition.

- c) Require buffering around industrial/manufacturing uses within employment areas

OFA supports this proposition too.

- d) Provide flexibility with employment planning by allowing density targets to be set for each employment area.

OFA categorically opposes reducing or providing flexibility for density targets. Density targets should be mandatory and enforceable. More comments are provided under Category 5, Intensification and Density Targets, and in our detailed comments on the proposed amendments.

Distributed Economic Development Beyond the GGH

OFA's campaign, Producing Prosperity in Ontario, calls for greater investment in Ontario's agri-food sector and rural communities as an effective strategy to deliver economic growth, enhance competitiveness and produce prosperity for all Ontarians. Distributing development across Ontario is the solution to ongoing challenges facing both rural and urban communities, including creating jobs and improving housing availability and affordability. New investments in rural communities will grow existing businesses, attract new businesses and boost regional economic development.

The current pattern of growth in the Greater Toronto/Hamilton Area is unsustainable. The development of growth-related infrastructure cannot keep pace with the urban population growth, leading to congestion, high housing costs and lower quality of life. OFA believes that distributing economic development province-wide will boost economic growth, create new jobs, provide new affordable housing options, ensure food security and contribute to environmental stewardship. This is good for rural communities and alleviates the growth pressures in our urban communities.

By supporting a strong domestic agri-food industry and investing in infrastructure that promotes economic development across the province, all Ontarians will have access to high-quality, safe, local food while stimulating the economy and creating agri-food jobs.

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1. **Settlement Area Boundary Expansions:** A system that enables local municipal decisions on reasonable changes to settlement area boundaries in a timely manner to unlock land faster for residential and commercial development and support more jobs and housing.
 - a) Provide more flexibility to settlement area adjustments by allowing reasonable expansions (up to 40 hectares) outside the municipal comprehensive review.
 - b) Allow settlement area boundary adjustments outside the municipal comprehensive review as long as there is no net increase in land.

For both a) and b), OFA strongly opposes settlement area boundary expansions outside of the municipal comprehensive review. Permitting flexibility for expansion promotes more low-density, haphazard growth. More details are provided in our overview of the proposed amendments.

OFA is also opposed to any settlement area boundary expansions occurring in the Greenbelt.

- c) Put in place a more outcome-based approach for settlement area boundary adjustments through the municipal comprehensive review.

OFA continues to advocate for fixed, permanent urban boundaries. The “outcome-based” approach for settlement area boundary expansions reduces the assurances in place (e.g. Agricultural Impact Assessments) that agricultural land will continue to be protected. Prescriptive policies clearly outline what needs to be done to protect agricultural land, while outcome-based only requires that impacts be avoided, minimized or mitigated. With increasing growth pressures on agricultural land, OFA favours stronger policies that provide certainty about where development should, and should not, occur. For farm businesses, certainty enables them to invest in improvements to their business leading to enhanced productivity and viability.

Small Rural Settlements: A system that recognizes small rural settlements as areas that are not expected to face significant growth pressures.

- a) Allow minor rounding out of rural settlements in keeping with the rural character of the area, and subject to other criteria.

OFA disagrees with a “minor rounding out” of rural settlements. This flexibility could allow for and amplify farmland loss. More details are provided in our comments on the proposed amendments.

- b) Create a new defined term, “rural settlements”, as a subset of “settlement areas”, while the term “undelineated built-up areas” would be deleted from the Growth Plan.

OFA is supportive of a new defined term, “rural settlements”.

- c) Specify that rural settlements are not part of the designated greenfield area.

OFA is opposed to this proposal. Rural settlements should also be subject to greenfield density targets to reduce urban sprawl and farmland loss. Population growth occurs across the full spectrum of settlements, from small to large. Regardless of the size of the settlement it occurs in, all population growth must be accounted for.

Agricultural System and Natural Heritage System: Greater Golden Horseshoe regional mapping systems that are factual and reflect the local mapping realities, while providing for the

appropriate level of protections for our natural resources and continuing to build the economic viability of our agri-food industry.

- a) Allow municipalities to use their existing Agricultural System and Natural Heritage System mapping as they transition to provincial mapping.
- b) Make provincial mapping of the agricultural land base and the Natural Heritage System apply only after implemented in the upper/single-tier official plans.
- c) Allow upper/single-tier municipalities to refine and implement provincial mapping in advance of their next municipal comprehensive review.
- d) Improve provincial mapping so that it better reflects local knowledge and planning work that has already been completed.

We oppose this proposal to remove and delay provincial mapping for the Agricultural System until further review, however, we are supportive of this proposal for the Natural Heritage System. While the two maps are being treated equally in this proposal, the provincial Natural Heritage System map has gross inaccuracies and lacks ground-truthing that needs to be rectified to reflect local knowledge.

The provincial map of the Agricultural System requires some minor refinements but is overall a very useful tool for identifying and protecting prime agricultural land and the agriculture-related assets that farm businesses depend upon. Allowing municipalities to ignore the provincial mapping until their next municipal comprehensive review enables their continued misuse of prime agricultural land for other uses. We recommend that the provincial mapping of the agricultural land base continue to be implemented and can be reviewed by municipalities during the next municipal comprehensive review. We agree that the provincial Natural Heritage System mapping should not be used until it can be ground-truthed and reconciled with municipal mapping.

Agricultural System

OFA wishes to reiterate its position on the Agricultural System in the provincial context. OFA recommends implementing the Agricultural System policies province-wide, including mapping of the Agricultural Land Base, identification of Candidate Areas, and implementation of the agri-food network. **OFA supports the Agricultural System being incorporated into the Provincial Policy Statement to consistently protect farmland and support the prosperity of the agri-food sector province-wide.**

Natural Heritage System

OFA generally agrees with most of the principles of mapping and implementing the Natural Heritage System (NHS). However, we do have concerns and suggested corrections for some specific principles; namely linkage criteria, ground-truthing, and consistency with current provincial NHS planning criteria and guidance.

There are inconsistencies in the language regarding agricultural land and the NHS. Farmland designated within the NHS is meant to be an **overlay**. The Natural Heritage Reference Manual clearly states that “it is a common and often appropriate municipal practice to use an overlay approach in the official plan to identify natural heritage systems, features, and areas within Ontario’s agricultural system designated as prime agricultural areas.” However, the Manual later notes that farmland functions as a linkage between natural features, or at least does not impede the movement of many species. As an overlay, the linkages and corridors do **not** constrain or limit ongoing agricultural activities, including the construction of agricultural buildings located in, or immediately adjacent to, natural heritage features. The Summary of Criteria and Methods ignores

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this guidance. OFA strongly suggests corrections to the Summary, as well as the Technical Report on Criteria, Rationale, and Methods, to correct this oversight.

OFA categorically disagrees with the criteria and size of linkages. A 500-metre-wide corridor could easily cover the entire width of a 100-acre farm and bears no relationship to the size of the natural heritage features themselves. OFA strongly recommends that linkage widths reflect the local landscape and the species likely to use the linkage and that the linkage or corridor widths should be no wider than the width of the features and areas they are connecting.

OFA demands verification and ground-truthing of the proposed natural heritage features and implementation procedures before municipalities incorporate them into their official plans.

Intensification and Density Targets: A simplified approach to minimum intensification and density targets that reflects the objective of supporting provincial transit investments, planned growth rates and local realities, including market demand for housing.

- a) Simplify and streamline the intensification and designated greenfield area density targets by grouping municipalities:
 - *Group A: City of Hamilton, Regions of Peel, Waterloo and York*
 - *Group B: Cities of Barrie, Brantford, Guelph, Orillia, Peterborough, Regions of Durham, Halton and Niagara*
 - *Group C: City of Kawartha Lakes and the Counties of Brant, Dufferin, Haldimand, Northumberland, Peterborough, Simcoe and Wellington*
- b) Specify that new targets take effect by 2022, with no further increase after 2031
- c) Measure the density target for new neighbourhoods in designated greenfield areas across existing and new designated greenfield areas
- d) Let all municipalities apply for alternative targets

MMAH Proposed Minimum Intensification Targets (percent of new units in already built-up areas)

- *Group A: 60% (increased from 50%)*
- *Group B: 50% (maintained 50%)*
- *Group C: maintain or improve on existing targets in official plans*

We are supportive of increasing Group A target from 50% to 60% and maintaining 50% for Group B, however, allowing Group C to set their own target is unacceptable. The target for Group C should be maintained at 50%.

MMAH Proposed Minimum Designated Greenfield Area Density Targets (residents and jobs per hectare)

- *Group A: 60 (reduced from 80)*
- *Group B: 50 (reduced from 80)*
- *Group C: 40 (reduced from 80)*

We are very concerned about the proposed weakening of density targets for designated greenfield areas. OFA continues to advocate for **increased and mandatory** densities for both intensification and designated greenfield areas. Higher greenfield densities will lessen the demand to convert agricultural lands to non-agricultural uses. They will facilitate the development of complete communities. There should be either mandatory compliance or strict penalties for municipalities that choose to ignore greenfield density targets.

The proposed amendments to the Growth Plan would continue to allow and broaden the application of alternative greenfield densities and require less justification for doing so. The proposed amendments would also allow municipalities to request alternative, lower targets. OFA categorically opposes this policy option and reiterates that compliance should be mandatory.

We further believe that in urban areas, higher density development should be mandated province-wide to take full advantage of existing infrastructure and protect agricultural land. The proposed amendments continue to fail 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.

6. Major Transit Station Areas: A streamlined approach that enables the determination of major transit station areas to happen faster so that zoning and development can occur sooner.

- a) Allow municipalities to delineate major transit station areas before their municipal comprehensive review, while maintaining provincial approval and protection, by designating these areas as “Protected Major Transit Station Areas” under the *Planning Act*

The proposed amendments increase the current zone of 500 metres to between 500 and 800 metres for increased density of existing and future transit stations. OFA supports this proposal because it encourages increased densities and reduces sprawl. We would recommend replacing 500 with 800 instead of providing a range.

- b) Simplify the process and criteria for alternative targets applicable to major transit station areas to reflect on-the-ground realities

OFA does not support alternative targets. Major transit station areas should continue to have mandatory, high-density targets to reduce sprawl. Higher cost public transit, such as subways and LRT require minimum densities to make the investments in them viable.

Agricultural Impact Assessments

The proposed changes diminish the use of Agricultural Impact Assessments (AIAs). OFA fully supports requiring an AIA for urban settlement boundary expansions, infrastructure and aggregate applications within the area covered by the Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and to a lesser extent within the area subject to the Niagara Escarpment Plan. OFA welcomes the use of AIAs to guide urban settlement boundary expansions, infrastructure, and aggregate license applications. We anticipate better outcomes for agriculture from these non-agricultural development activities, guided by AIAs. For settlement boundary expansions, infrastructure, and aggregate license applications, OFA would welcome AIAs as a requirement province-wide in the next review of the Provincial Policy Statement. OFA recommends that AIAs are required as a standalone assessment, as opposed to incorporated under the requirements of an environmental assessment.

EBR 013-4506 Proposed Framework for Provincially Significant Employment Zones

MMAH is proposing to identify provincially significant employment zones (PSEZ) to “ensure employment areas that are crucial to the province’s economy are not converted without a more

comprehensive assessment of employment land need”. There are still many questions left unanswered before OFA can support the concept of these zones. For instance:

- 1) How are “Provincially-Significant Employment Zones” defined?
- 2) What is the threshold for inclusion or exclusion of an area?
- 3) What “problem” are PSEZs solving? Is residential conversion and encroachment in these areas truly a risk to these employment areas? Or is the problem only created if the proposed amendment to allow municipalities to re-designate existing employment areas to residential and mixed-use before the next municipal comprehensive review?
- 4) How can large employers that are not within a “cluster” of employment, but are still provincially significant, be recognized?
- 5) Would the province consider an economic development strategy aimed at employment zones province-wide, instead of a land use policy targeted at the GGH?

OFA agrees with the “longer-term purpose for the province and municipalities in the Greater Golden Horseshoe (GGH) [to provide] a regional picture of some of the key employment areas that make up the region’s economic land base”. If this framework proves useful, agri-food businesses are large employers and significant economic drivers in the GGH and should be identified as well.

Identifying these zones could help coordinate planning and economic development efforts and drive economic growth in the region, however, significant employment zones do not stop at these borders. Identifying “provincially-significant” zones *only* within the GGH implies that there are no provincially-significant zones outside of this area. If this policy proves useful, OFA would encourage MMAH to consider incorporating this policy across Ontario.

As an alternative (or complement) to PSEZ, the provincial government should consider developing an Agri-Food Economic Development Strategy that supports the full range of agri-food businesses and the agri-food support network across the province. The strategy would recognize the nearly \$40 billion in GDP and over 822,000 jobs supported by the agri-food industry in Ontario, and help it grow and thrive through strategic investments in infrastructure, cluster development, job creation, and innovation.

PSEZ and Major Transit Station Areas

The proposed provincially significant employment zones include parts of 81 major transit station areas (MTSAs). While MTSAs could support mixed-use development and housing development in the region, existing industrial uses in these areas should be protected. OFA supports land use planning that promotes co-location of compatible uses and discourages neighbouring incompatible uses.

Growth Plan changes should not allow for ongoing conversions of employment zones to residential areas. Where employment areas overlap with major transit station areas, OFA believes that they should be included in the provincially significant employment zones. This means conversions to residential or other uses can only happen at the time of the next municipal comprehensive review. OFA supports smart, long-range land use planning. Alternatively, excluding these employment areas from the zones means they would be eligible for conversion in advance of the next municipal comprehensive review. Reiterating our concerns above, allowing

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conversions to occur anytime within a land use planning cycle reduces certainty and ultimately causes further delays. Allowing residential development in an area earmarked for industrial development dilutes the goal of provincially significant employment zones; to “protect a robust inventory of strategic lands for employment to meet the diverse needs of current and future employers in this region”.

Due to the many consultations occurring related to land use policies, OFA would like to provide the following letters for reference on our position on related matters of housing supply, creating jobs, and reducing red tape:

- [EBR 013-4190: Increasing Housing Supply in Ontario](#)
- [EBR 013-4293: Bill 66, Restoring Ontario’s Competitiveness Act, 2018 \(Schedule 10\)](#)
- [Letter to Hon. Minister Clark re: Growth Plan Implementation in the Greater Golden Horseshoe](#)
- [Letter to Hon. Minister Hardeman re: Agricultural Impact Assessments](#)

EBR Registry No. 013-4507 Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plans) made under the Planning Act to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017

From OFA’s perspective, empowering municipalities to refine and implement the mapping of the Agricultural System and the Natural Heritage System outside of a Municipal Comprehensive Review is good. We want upper and single-tier municipalities to be consistent, and to have up-to-date mapping in place ahead of any settlement area boundary expansions.

EBR Registry No. 013-4505 Proposed Modifications to O. Reg. 311/06 (Transitional Matters – Growth Plans) made under the Places to Grow Act, 2005 to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017

OFA offers no comments on the content of this posting.

Specific Comments on the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe:

- 1.1 OFA opposed the change from “low density urban sprawl” to “unmanaged growth”. The two terms are not equivalent. OFA does not support replacing “urban sprawl” with “unmanaged growth”. Urban sprawl in the Growth Plan area is a very real threat to farmland loss and should not be undermined. OFA believes “low density urban sprawl” should remain.

VISION

The vision adds “work and play” which is consistent with the overall concept of complete communities. Removing “a clean healthy environment, and social equity” from the Growth Plan communicates a strong message that they are not main priorities of the current government. The Growth Plan should balance economic needs with social and environmental objectives. “A clean healthy environment, and social equity” should be restored to this section.

We are pleased to see the inclusion of “protects the environment and will ensure a cleaner environment is passed on to future generations”. We are also pleased to see the support

for complete communities, including transit. We support the acknowledgement that there are multiple urban areas of importance in the GTHA. We would appreciate including a recognition of the value of rural areas as well.

1.2.1 OFA accepts these proposed changes.

2.1 Under 2.1 Context, adding “larger urban centres” to the sentence takes the onus off of smaller communities to grow at transit-supportive densities. The province should also be striving for compact communities in smaller urban and rural areas.

OFA opposes the removal of “there is a large supply of land already designated for future urban development in the GGH. In some communities, there may be more land designated for development than is required to accommodate forecasted growth to the horizon of this Plan”. Removing this from the Plan is a blatant lack of recognition that ‘land availability’ is not the issue.

2.2.1.2b) OFA accepts the change from “undelineated built up areas” to “rural settlements”.

2.2.1.4 e-f) OFA accepts these proposed changes.

2.2.2.1 OFA believes intensification targets should be changed to intensification requirements.

OFA continues to advocate for increased and mandatory density targets for both intensification and designated greenfield areas. There should be either mandatory compliance or strict penalties for municipalities that choose to ignore intensification targets.

Municipalities in Group C must be provided with specific intensification requirements. Allowing municipal discretion promotes sprawl and low-density development that will pave over farmland and will not achieve compact, transit-friendly communities.

2.2.2.4 OFA strongly opposes the option for municipalities to request alternative targets. Continued low density is not the answer. In addition, the application of this provision seems to be broader than in the current Growth Plan. “Given the size, location and capacity” is too subjective. We discourage removing the criteria from 2.2.2.5 (a-h).

2.2.4.2 The phrase “limited number of residents and jobs associated with the built form” is too subjective.

2.2.5 Employment

There needs to be recognition and emphasis that there is significant stable, recession-proof employment driven by Ontario’s agriculture and agri-food sector.

2.2.5.8 Under the “development of sensitive land uses, major retail uses, or major office uses” add “agricultural” uses to the list of uses to avoid, minimize and mitigate the adverse impact on.

2.2.6 Under Housing, OFA continues to advocate for increased and mandatory density targets for both intensification and designated greenfield areas. There should be either mandatory compliance or strict penalties for municipalities that choose to ignore intensification targets.

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- 2.2.7.2 OFA opposes the reductions to density targets in designated greenfield areas. We cannot effect change without mandatory requirements at levels that will drive the development of compact, transit-friendly communities.
- 2.2.7.2 a) Reducing targets from 80 to 60 persons and jobs per hectare; (b) to 50 and (c) to 40 is unacceptable.
- 2.2.7.4 The option to request alternative targets is unacceptable. Adding “in a manner that is appropriate of the characteristics of the municipality and adjacent communities” is too subjective.
- 2.2.8.3 f) Do not remove Agricultural Impact Assessments from the criteria for proposed settlement area boundary expansions. “Will be” should be changed to “shall be”.
- 2.2.8.4 Regarding land swaps, OFA recommends language should be added to this section to require “swaps” be directed towards lowest capability lands, based on an Agricultural Impact Assessment.
- 2.2.9.7b) For rural areas, minor adjustments should not be made outside of a municipal comprehensive review. A definition is not provided here for “minor rounding” and OFA does not support this proposal.
- 3.2.1 The list of studies was removed and replaced with “relevant studies”. We do not support this change as it leaves it open to interpretation to determine what studies are “relevant”.
- 3.2.5 Under infrastructure corridors, OFA suggests adding Agricultural Impact Assessments and the Agricultural System to 1(d).
- 4.1 Under the Context of Protecting What is Valuable, OFA believes that the Agricultural System should be added to paragraphs 6 and 10.
- 4.2.2.5 For refining the provincial mapping of the Natural Heritage System for the Growth Plan, a section should be added to include consultation with affected landowners. OFA is also concerned about how refinement will be undertaken and who will have the final say in how inconsistencies are reconciled.
- 4.2.4.4b) OFA argues that new agricultural buildings and structures adjacent to a woodlot should be exempt, including additions to existing agricultural buildings and structures that would extend into the 30-metre setback area. This exemption should be added to this section.
- 4.2.6.3 For the Agricultural System implementation, the use of an Agricultural Impact Assessment should be mandatory. Remove the language “where appropriate”.

DEFINITIONS:

For major transit station area (MTSA), change the proposed “500 – 800 metre” to “a minimum of 800 metres”.

For rural settlements, it is important to note the emphasis on private on-site water and wastewater systems.

A definition is not provided for “provincially significant employment zones” and must be included.

Thank you for the opportunity to provide our feedback on the Proposed Amendment 1 to the Growth Plan in the Greater Golden Horseshoe, the Proposed Framework for Provincially Significant Employment Zones, and the proposed transitional regulations. Overall, OFA does **not** support making any changes to the Growth Plan for the Greater Golden Horseshoe. We trust that our perspectives and advice will be reflected in any Growth Plan amendments, as well as future land use planning policy considerations.

Sincerely,



Keith Currie
President

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
The Honourable Todd Smith, Minister of Economic Development, Job Creation and Trade
The Honourable Monte McNaughton, Minister of Infrastructure
The Honourable Rod Phillips, Minister of the Environment, Conservation and Parks
OFA Board of Directors