

March 14, 2019

The Honourable John Yakabuski
Ministry of Natural Resources and Forestry
99 Wellesley St. W, 6th Floor
Toronto, ON
M7A 1W3

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

Dear Minister Yakabuski and Minister Clark,

RE: Niagara Region Recommendations for Niagara Escarpment Plan Agricultural Policies

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.

OFA supports Niagara Region's proposal for changes regarding how agriculture-related uses, on-farm diversified uses, and wineries are permitted in the Niagara Escarpment Plan (NEP, 2017). As indicated in their submission, grape and associated wine production is the biggest driver behind Niagara's agri-food sector. The local economy depends on creating and maintaining a hospitable environment for this sector and long-term preservation of agricultural lands. Policies that hinder farm and agri-food business viability and the ability to fully use their land for agricultural uses are to be condemned. Policies that actively deter agricultural uses, agriculture-related uses, agritourism uses and on-farm diversified uses have no place in the Niagara Escarpment Plan or its companion plans.

OFA supports Niagara Region's request that all winery-specific policies in the NEP be removed. While all of Ontario's other land-use planning documents recognize wineries as an equal use to other agriculture-related on-farm diversified uses, the NEP continues to place wineries under a different policy framework. These inconsistencies create additional red tape and stifle business growth and innovation. In particular, the 29 wineries operating under the jurisdiction of the NEP must operate under a *different* set of regulations than the 67 outside of the NEP area in the Niagara Region, not to mention those in the rest of Ontario. It is unnecessary and puts wineries in the NEP area at competitive disadvantage.

OFA's position aligns with Niagara Region's recommendations and urges the NEP to address the inconsistencies in language between the NEP and the Guidelines on Permitted Uses for Ontario's Prime Agricultural Areas as mentioned in the Report (p. 5-6). In 2016, the Province released the *Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas*. This document, which outlines guidelines for agriculture-related and on-farm diversified uses, is not reflected in the 2017 Niagara Escarpment Plan, despite significant changes to the other provincial plans.

OFA supports Niagara Region's recommendation that beyond permitting the agriculture-related or on-farm diversified use, size and placement of buildings, additional uses of buildings, and activities on the site should be at the discretion of the local municipality. OFA also believes that guidelines for events and event spaces inside the NEP should mirror those applicable outside of the NEP, including: appropriate land use designations, frequency of use, and servicing requirements.

OFA supports Niagara Region's proposal. In addition, we also believe that the Niagara Escarpment Commission's role in development approval is unnecessary in 2019, and simply serves to add red tape, costs and delays to development applications, particularly agriculture-related development applications. Municipalities throughout the area covered by the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan (ORMCP) and the Growth Plan for the Greater Golden Horseshoe (Growth Plan) are all the sole approval agency for development, based on conformity with either the 2014 Provincial Policy Statement (PPS) or specific policies in Greenbelt Plan, the ORMCP or the Growth Plan. Treating lands and development decisions within the Niagara Escarpment Plan area differently than in the Greenbelt Plan, the ORMCP or Growth Plan areas is a carryover from the time when many municipalities had no Official Plan, and therefore had no ability to direct where development should go, and where it should not go. This is no longer the case. Every upper-tier, single-tier and lower-tier municipality is obligated to have an up to date and approved Official Plan, which fully conforms to either the 2014 Provincial Policy Statement or one of Ontario's geographically-specific land use plans. OFA therefore recommends that the Niagara Escarpment Commission cease to exercise any role in development approval.

OFA also recommends that ministerial oversight for the Niagara Escarpment Plan be transferred from the Ministry of Natural Resources and Forestry to the Ministry of Municipal Affairs and Housing. Currently, ministerial oversight for the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe and the Oak Ridges Moraine Conservation Plan, along with the overarching Provincial Policy Statement all lie with the Ministry of Municipal Affairs and Housing. Businesses should not need to contact multiple ministries and multiple governing bodies for similar provincial plans and should not have to sift through varying definitions across the plans. These inconsistencies result in ambiguity and misinterpretation, causing costly delays and stifling business development. The OFA emphatically recommends that ministerial oversight for the Niagara Escarpment Plan be transferred from the Ministry of Natural Resources and Forestry to the Ministry of Municipal Affairs.

The Niagara agri-food sector has an annual total economic impact of \$3 billion and employs 17,500 people with untapped economic potential to create new jobs and expand. OFA fully endorses Niagara Region's proposal and encourages these changes to the Niagara Escarpment Plan and Niagara Escarpment Commission to reduce red tape and support the thriving agri-food economic powerhouse in the Niagara Region.

Sincerely,

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

Keith Currie
President

cc: OFA Board of Directors
 Hon. Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
 Niagara North Federation of Agriculture
 Niagara South Federation of Agriculture
 Grape Growers of Ontario
 Wine Council of Ontario