

July 27, 2020

Ms. Sandra Bickford  
Ontario Growth Secretariat  
Ministry of Municipal Affairs and Housing  
777 Bay Street  
Suite 2304  
Toronto, ON  
M7A 2J8

Dear Ms. Bickford;

**RE: ERO 019-1679 Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe, and**

**ERO 019-1680 Proposed Amendment 1 to A Place to Grow: Growth Plan for 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. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Years ago, the Middlesex Federation of Agriculture once posted the following message on a billboard. This message is timely in light of EROs 019-1679 and 019-1680;

**Humans, despite all their accomplishments, owe their entire existence to six inches of topsoil and the fact that it rains.**

Due to the negative impacts we foresee in EROs 019-1679 and 019-1680 for agriculture and the broader agri-food system within the Growth Plan for the Greater Golden Horseshoe area, OFA believes now is the appropriate time to reiterate Middlesex Federation's message.

In previous submissions, we have highlighted the Ontario-wide loss of agricultural land; from 12.6 million acres in 2011 to 12.3 million acres in 2016. Focussing on the Greater Golden Horseshoe, the losses to agricultural land parallel those for our province as a whole; from 3.5 million acres in 2011 to 3.4 million acres in 2016. Given the concentration of food processing facilities in the Greater Golden Horseshoe, the continuous loss of agricultural land here jeopardizes the long-term presence and viability of these facilities, and their employment and capacity to provide us with locally grown food while also mitigating the impacts of a changing climate.

Before we address our specific concerns with and objections to the proposed amendments, OFA cautions against and disagrees with adopting the proposed population and employment forecasts

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contained in the Hemson report, in a post-COVID Ontario. The growth assumptions they are based upon, while valid when developed, are now highly questionable due to COVID-19. No one can state with any degree of certainty how quickly our economy will recover from the impacts of the COVID-19 shut down. Uncertainty remains on how COVID-19 will impact personal decisions based on where to live and work, or what the future demands for housing will be, including the expanded impacts of working from home. There continues to be uncertainty surrounding which sectors will take longer to return to pre-COVID levels of employment and output. OFA strongly recommends the Ontario government withdraw EROs 019-1679 and 019-1680 until such time as we have a clearer image of a post-COVID Ontario, and that the population and employment forecasts be recalculated in light of how our post-pandemic economic recovery is performing. OFA further recommends that these proposed changes to the Growth Plan be shelved for a minimum of 18-24 months to allow our progress towards recovery to be evident. It would also allow the proposed growth projections to be re-evaluated based on updated data and a better understanding of how Ontario's post-COVID economic recovery is performing.

Agriculture and agri-food processing are Ontario's number one economic drivers. In 2019, Ontario's agriculture and agri-food sector, from field to fork, contributed \$47.28 billion to Ontario's economy and supported 860,494 jobs. It's important for policymakers to not lose sight of this reality when making decisions about future population and employment growth. These decisions need to look at population and employment growth province-wide and abandon the Greater Golden Horseshoe-centric focus as the primary recipient of population and employment growth. Allocating so much growth to one region of the province is harmful to the economic viability of Ontario as a whole, and will exacerbate the rapid growth challenges that the Greater Golden Horseshoe already faces; sprawling growth, traffic grid lock, high housing costs and environmental degradation. In lieu of this Greater Golden Horseshoe-centric approach to growth and development, OFA strongly recommends that a distributed economic growth and development approach to growth planning be adopted; one that distributes the benefits of economic growth and development across **all** regions of Ontario.

OFA has repeatedly emphasized to a succession of provincial governments that Ontario's prime agricultural lands, the lands we depend upon for locally produced food and key to underpinning our food security, have been in a steady decline for over a quarter of a century. The continuing loss of the key resource that underpins Ontario's agriculture and agri-food sector has the potential to jeopardize the future of food production in the province. To at least maintain the sector's contributions to Ontario's economy, the steady conversion of prime agricultural land for urban uses must be halted, not only in the Greater Golden Horseshoe area but beyond it as well. The stark reality facing Ontario is that less than 5% of its land base can support any form of agricultural production. Of that mere 5%, a smaller portion contains our most productive Class 1, 2 or 3 soils. Much of the agricultural land in the Greater Golden Horseshoe is Class 1, 2 or 3 soils. Converting evermore of Ontario's finite and shrinking agricultural land to urban uses is not a solution that benefits any sector of Ontario's economy, including the development sector.

Lack of available land for development is not the issue. Three decades of provincial planning have mandated that municipalities have a minimum of a 25-year supply of land available for development 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 ample land for urban growth across the entire Greater Golden Horseshoe as well as beyond, sufficient to accommodate projected growth to at least 2041, if not further.

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The proposed amendments promote urban sprawl in the Growth Plan area, the sole threat to the region's farmland losses. When we lose agricultural land to development, it is lost forever. This results in a loss of businesses in our rural communities; a lost opportunity to produce more agricultural-based products through innovation and technological advancements; a loss of employment from food processing and agritourism; and a loss for rural communities that a succession of Ontario governments have promised to support.

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 economic development and growth beyond the Greater Golden Horseshoe to benefit all of 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, including access to stable high-speed internet and natural gas.

OFA believes the current pattern and degree 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 strongly believes that distributing economic development province-wide is the solution. It will boost economic growth, create new jobs, provide new affordable housing options, ensure food security, and contribute to environmental stewardship. This is positive for rural communities and alleviates growth pressures on the Greater Golden Horseshoe.

#### **Comments on specific aspects in 019-1679 & 019-1680:**

##### **1.2.3; How to Read this Plan:**

OFA believes that the interchangeable use of "will" and "shall" or "is not" and "will not be" leads to misinterpretation of Plan policies, and their intent. Instead of using "will" and "shall" or "is not" and "will not be", OFA recommends that "shall" and "shall not" be universally used.

##### **2.1; Context:**

OFA does not see any justification whatsoever to undertake the extension of the planning horizon from 2041 to 2051 at this time. It is a contrived need. The Hemson technical paper on growth forecasts (page 8) highlights the problem in forecasting over such a long-time frame – the further into the future one tries to forecast, the less reliable the forecast is. The outcome of the proposed extension to 2051 will give municipalities the perception that they need to designate even more prime agricultural land to accommodate this future growth, which will simply accelerate the loss of prime agricultural land and accelerate the negative consequences of sprawling growth across the Greater Golden Horseshoe; grid-locked traffic, high housing costs and environmental degradation.

Assessments of projected population and employment growth from 2005 onward indicate that most Greater Golden Horseshoe municipalities have fallen short of those initial objectives. We have overestimated population and employment growth, meaning we have designated more land than necessary to accommodate this projected growth. It's an indication those earlier population and employment growth objectives were overly ambitious. If past population and employment growth have fallen short of projected objectives, over times with none of the economic and social upheaval that we are experiencing with COVID-19, the stark conclusion is that these proposed amendments will continue to over-designate land for growth. To propose an extension of the

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planning horizon from 2041 to 2051 at this time is unnecessary and will lead to further preventable losses of prime agricultural land, losses to agri-food processing businesses and farm support businesses in the Greater Golden Horseshoe. Now is simply not the appropriate time in Ontario's history to undertake an extension of the Growth Plan's planning horizon from 2041 to 2051. OFA categorically opposes this proposal, and strongly requests that this extension be rescinded.

### **2.2.1; Managing Growth and 5.2.4; Growth Forecasts:**

Allowing municipalities to set and approve their own higher growth than the Growth Plan's own forecasts seems imprudent and does not serve a valid reason. It completely undermines the Growth Plan's vision from its inception of growth management by allocating population and employment growth fairly and equitably across the multiple municipal jurisdictions that collectively make up the Greater Golden Horseshoe. It will initiate a race to the bottom as municipalities produce their own "studies" to "justify" growth beyond the Growth Plan's forecasts. It will accelerate agricultural land losses across the Growth Plan area, hamstringing Ontario's productive agri-food sector. OFA firmly opposes this proposed change to the Growth Plan and demands its withdrawal. Allowing municipalities to set and approve their own growth ignores the key role of Ontario's agriculture and agri-food sectors contributions to our economy and employment – contributions that are recession-proof. This proposed amendment caters to those outer ring municipalities that have subscribed to the flawed premise that population and employment growth can carry on forever and solve a municipality's economic problems. Low density growth will exacerbate a municipality's economic problems through ongoing higher servicing costs.

### **4.2.8; Mineral Aggregate Resources:**

OFA recognizes the need for aggregates by all sectors of the economy, including agriculture. We also recognize that there are economic benefits from close to market sources of aggregates. However, it is not prudent to assume that Ontario's post-COVID-19 need for aggregates will mirror its pre-COVID-19 levels of consumption. Furthermore, there are areas and features across Ontario that deserve protection from any and all development, including protection from the development of new pits and quarries – the habitat of endangered and threatened species, wetlands, and prime agricultural lands. Removing the Growth Plan's current prohibition on new pits and quarries within the habitat of endangered and threatened species is short-sighted. Removing the Growth Plan's current prohibition on new pits and quarries within the habitat of endangered and threatened is contrary to language used on page 4 of the text of Proposed Amendment 1, protecting "the natural environment". This proposed amendment does the opposite. OFA firmly opposes changing the Growth Plan to permit new pits and quarries within the habitat of endangered and threatened species.

### **Definitions:**

#### **Cultural Heritage Landscape:**

OFA has several concerns with the definition of a "cultural heritage landscape". Terms such as "views", "buildings" and "structures" in the context of cultural heritage are highly subjective from person to person. In the case of human-modified landscapes, which agricultural Ontario is, we have concerns that some may perceive changes to these landscapes, such as the construction of new farm buildings, or the demolition of existing farm buildings, as contrary to their cultural heritage value. We must not lose sight of the reality that agricultural Ontario is a working landscape; farmers earn their livelihood on the land, growing a diverse range of crops or raising a diverse range of livestock and poultry. Agricultural lands, and the buildings and structures they depend upon cannot be locked in the past in pursuit of the preservation of cultural heritage

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landscapes. OFA recommends that policies to implement protection of cultural heritage landscapes recognize a “working landscapes” concept that does not lock agricultural lands, and the buildings and structures they depend upon in the past, but facilitates those changes to the agricultural landscape, and the buildings and structures farmers depend upon to maintain productivity, profitability and environmental stewardship.

### **Ecological function:**

OFA believes that the proposed rewording of the definition of “ecological function” weakens the definition. Removing the phrase “including hydrologic functions, and biological, physical, chemical and socio-economic interactions” with the sentence, “These may include biological, physical, chemical and socio-economic interactions” fundamentally changes the definition in a negative manner. OFA opposes this change and recommends the reinstatement of the 2019 definition of “ecological function”.

### **Municipal Water and Wastewater Systems:**

Adding “decentralized systems” is likely to lead to more development of private wells and septic systems, a growth scenario which OFA views as undesirable. The maintenance of pristine supplies of drinking water is vital to all aspects of life. We must ensure that future population and employment growth in no way threatens to imperil our access to pristine supplies of drinking water. We can achieve this by directing growth to urban areas with full municipal services. OFA is concerned that the addition of “decentralized systems” is likely to open the door to expanded reliance on decentralized systems for development. Ontario’s farmers and rural residents are wholly dependent on pristine supplies of drinking water from private wells. OFA recommends that “decentralized systems” be dropped from the definition of Municipal Water and Wastewater Systems.

OFA notes that there are areas within the Growth Plan’s geography that are solely dependant on groundwater for municipal water. Examples of such groundwater-dependant areas identified in the recently released consultation document, “Updating Ontario’s Water Quantity Framework” include Guelph-Wellington County, Orangeville, Whiteman’s Creek, and Innisfil Creek. Further growth and development in areas such as these must consider the capacity of groundwater to not only supply possible future growth and development, but also ensure that existing water users in these watersheds do not suffer from water shortages.

### **On-farm diversified uses:**

OFA supports the revision of the definition of “on-farm diversified uses” by adding the sentence, “Ground-mounted solar facilities are permitted in prime agricultural areas and specialty crop areas only as on-farm diversified uses”. This change reflects the definition in the 2020 Provincial Policy Statement, a change OFA supported.

OFA welcomes this opportunity to provide its agriculturally based perspectives on Environmental Registry postings 019-1679 and 019-1680. We trust that the Ministry of Municipal Affairs and Housing will incorporate them in the decisions on Environmental Registry postings 019-1679 and 019-1680. In addition, OFA also reiterates the following longstanding land use planning and Growth Plan for the Greater Golden Horseshoe recommendations;

- i. The adoption of fixed, permanent urban boundaries for all municipalities, not only those subject to A Place to Grow: Growth Plan for the Greater Golden Horseshoe, but also to those beyond,

- ii. The conversion of the density and intensification targets in A Place to Grow: Growth Plan for the Greater Golden Horseshoe into mandatory density and intensification requirements with penalties and consequences for failure to comply, and
- iii. End the policy of phasing in density and intensification targets, which only perpetuates planning policies that have brought us the urban sprawl and congested roads that the Greater Golden Horseshoe faces today.

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.

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  
OFA Board of Directors