



July 29<sup>th</sup>, 2020

Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay St., 13th Floor  
Toronto, ON  
M5G 2E5

**RE: ERO Registry #019-1680 for input on Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. We protect farmland in order to ensure a safe and sustainable food supply for future generations of Ontarians. OFT achieves this through direct land securement, stewardship, policy research, and education.

Thank you for the opportunity to submit feedback on the proposed Amendment 1 to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. OFT has played an active stakeholder role in other provincial land use planning policy reviews, and is pleased to continue working with the Province to refine and strengthen policy direction in Ontario.

While OFT understands that the growing population of the Greater Golden Horseshoe (GGH) will require increased housing supply, we would like to caution against prioritizing housing over agricultural lands and natural habitats. The agri-food sector annually contributes over \$39 billion to the GDP, and employs over 820,000 Ontarians along the supply chain<sup>1</sup>. Non-agricultural development on farmland has already impacted the viability of Ontario's agri-food economy, and farmland in the GGH faces some of the highest levels of development pressure. The GGH also contains some of the most fertile farmland in the province<sup>2</sup>, and is able to grow specialty products that are difficult to grow in other areas of the province, and that contribute significant value to the province's agri-food economy<sup>3</sup>. Aggregate extraction on farmland results in irreversible damage. Even if rehabilitation occurs on the site, the productivity of the farmland is negatively impacted<sup>4</sup>, and there is a significant likelihood that the land will never be returned to agricultural uses<sup>5</sup>. When this type of development occurs on farmland in the GGH, we are losing the ability to grow specialty crops that have the potential to contribute significantly to our economy. We are concerned that changes proposed in Amendment 1 that serve to reduce protections for farmland in order to allow for an increase in aggregate extraction and urban development will have irreversible negative impacts on the economic viability of Ontario's agri-food sector and our ability to feed ourselves.

OFT commends the Province's ongoing commitment to the Agricultural Systems approach that is apparent throughout Amendment 1. This approach not only works to protect farmland, but also supports a broad network of infrastructure, agricultural services, distributors, and processors that are vital to protecting the viability of Ontario's agricultural sector. As such, we appreciate the adoption of this approach in the proposed changes to the Growth Plan. Additionally, we agree with the longer planning horizon that has been proposed within these changes. Having a strong policy framework in place for long-term planning can help municipalities better understand the long-term needs of their community so that they may plan accordingly. It is our hope that these extended growth forecasts will stimulate discussion about sustainable planning within the community that will help municipalities balance population growth with the protection of critical non-renewable resources like farmland. Providing farmers with long-term assurance that their farmland is protected against urban development will protect the viability of the local agricultural system and will help prevent land speculation by developers, keeping farmland in the hands of farmers.



**OFT has the following recommendations to strengthen the proposal:**

- 1) **OFT recommends that density targets are prioritized over population forecasts as guiding forces in land use planning in the GGH.** The provincial government should be emphasizing the importance of these targets in the Growth Plan in order to communicate the importance of these targets to municipalities and to encourage appropriate and sustainable land use planning.
- 2) **OFT recommends that section 2.1 be altered to accurately reflect the growth forecasts provided, by removing “at a minimum” from the amendment.** The statistic used in this section reflects the projected population in the reference scenario rather than the low scenario, and therefore is not truly the minimum forecast. Furthermore, the inclusion of statistics from the reference scenario indicates the Province’s intentions of accepting the reference scenario as correct rather than taking into account the opinions of stakeholders and experts.
- 3) **OFT recommends that the opportunity for municipalities to plan for higher forecasts than what is in the Growth Plan be removed from section 2.2.1.1.** Allowing municipalities to use higher growth forecasts in their land use planning will open the door to land speculation, making farmland unaffordable and threatening the viability of the agri-food system.
- 4) **OFT recommends that the protections for the habitat of endangered and threatened species against new aggregate operations be reinstated in section 4.2.8.2.** Farmland is part of a larger ecosystem, and is often home to endangered and threatened species. Removing the protections for these species directly places farmland and the associated farm ecosystems at risk of being destroyed by aggregate operations.

Thank you for this opportunity to share our recommendations and feedback on the Proposed Amendment 1 to *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with the Province further.

Most Sincerely,

Kathryn Enders  
Executive Director  
Ontario Farmland Trust

**References**

- [1] Ontario Federation of Agriculture. (2018). Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Ontario Federation of Agriculture & Environmental Defence. (2015). Farmland at risk: Why land-use planning needs improvements for a healthy agricultural future in the Greater Golden Horseshoe. <https://environmentaldefence.ca/report/report-farmland-at-risk/>
- [3] Planscape Inc. (2015). Regional Agri-Food Strategies for the Greater Golden Horseshoe: Policies and Tools to Sustain Farming. <http://www.planscape.ca/planscapePDFs/NEW-plan1.pdf>
- [4] Gravel Watch Ontario. (n.d.). Rehabilitation. <http://gravelwatch.org/rehabilitation/>
- [5] Binstock M., and Carter-Whitney, M. (2011). Aggregate Extraction in Ontario: A Strategy for the Future. Canadian Institute for Environmental Law and Policy. <http://cielap.org/pdf/AggregatesStrategyOntario.pdf>