



LONG-TERM THINKING FOR TODAY'S ISSUES

February 28, 2019

Hon. Steve Clark, MPP
Ministry of Municipal Affairs and Housing
17th Floor, College Park
777 Bay Street, Toronto, ON, M5G 2E5
Via email: minister.mah@ontario.ca

Re: Christian Farmers Federation of Ontario Response to the Following Four Proposals

ERO 013-4504 Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017.

ERO 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

ERO 013-4506 Proposed Framework for Provincially Significant Employment Zones

ERO 013-4507 Proposed Modifications to O. Reg. 525/97 (Exemption from Approval – Official Plan Amendments) made under the Planning Act to implement the Proposed Amendment to the Growth Plan for the Greater Golden Horseshoe, 2017

Dear Minister Clark,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

CFFO is pleased to have been invited to focus groups and the larger stakeholder meetings regarding implementation of the Growth Plan for the Greater Golden Horseshoe, 2017 (Growth Plan), where we made several contributions that echo the content and intent of this letter. Firstly, we commend the government for committing to “build communities that maximize infrastructure investments, while *balancing* local needs for the agricultural industry and natural areas” and “maintain *protections* for the Greenbelt, agricultural lands, the agri-food sector, and natural heritage systems” (<https://ero.ontario.ca/notice/013-4504>, emphasis added).

CFFO questions, however, *how* these commitments can be met given that reductions in the level of protections for prime agricultural and natural lands are *inevitable* with the proposed reduced density and intensification targets and proposed settlement area boundary expansions. Moreover, agri-food sector growth, which is a priority under these four proposals, depends on availability of productive lands that are threatened by these target reductions and boundary expansions.

CFFO also asks whether the changes can be deemed acceptable to Ontarians after only a few months of stakeholder meetings. The original Growth Plan was negotiated over many years with all stakeholders, and indications are that preferences in Ontario for the economic, environmental and social wellbeing balance that is the foundation of the Growth Plan have not changed since 2017 when the Growth Plan was finalized, as evidenced by the recent outcry against Schedule 10 of Bill 66. The Province now proposes to shift the *balance* of sustainable economic, environmental and social wellbeing goals in favour of short-term economic goals. The shift to favouring the short term is a recipe for reducing the potential for the long-term sustainable balanced growth for the Greater Golden Horseshoe (GGH) that Ontarians want.

Because farmland protection is one of CFFO's fundamental priorities, CFFO cannot support the four proposals. They risk a return to the kind of historical growth path of low-density urban sprawl that reduces farmland, jeopardizing the health of the agri-food system, and ultimately, food security.

We have concerns as well that the proposals would also put at risk the CFFO priorities for soil quality and water quality and quantity. Our fourth priority is to seek government support for a business climate that supports agri-business. While the pro-growth proposals may be beneficial in the short-term in this regard, our focus is always on a sustainable long-term. Trading off long-term sustainability for short-term gains is not prudent stewardship.

We have studied the proposals, attended the Ministry meetings on the Growth Plan and the Planning Act/Provincial Policy Statement, and we have consulted with other stakeholder groups regarding these four proposals. Other organizations, such as the Ontario Farmland Trust, the Ontario Federation of Agriculture, Ontario Nature and the Oak Ridges Moraine Partnership, have sent to you specific recommendations, which CFFO wholeheartedly supports. We endorse their overarching recommendations, which are to maintain settlement area boundaries and either maintain or increase density and intensification targets of the Growth Plan for the Greater Golden Horseshoe, 2017.

CFFO recommends that the Province focus policy on the following: promoting development of brownfields, both in rural areas and within municipalities; encouraging urban renewal; improving transport links to major job centres; and speeding up development approvals, particularly within municipal boundaries, without sacrificing environmental and other important protections.

Furthermore, we encourage the government to refrain from using land-use policy to solve economic and social problems that are better addressed with different, more appropriate policy instruments. For example, your review of housing supply shortages will hopefully lead to better incentives to supply rental accommodation. This review is well placed, but we also need to address our income disparity problem with tax and income reforms and social policies to enable hard-working Ontarians to afford rent and mortgages.

Overall, the greatest impediment to CFFO's consideration of support is the lack of information about the tradeoffs involved in the four proposals. We need to know: Is it feasible? What are the alternatives? What are the quantitative impacts across sectors and groups in the short and long terms?

Indeed, how can anyone assess the net value of the proposals or rank alternative policies without more information about the measured impacts of the proposed changes to the already-agreed-upon Growth Plan?

We recommend that the Province make a commitment to invest in building a framework of integrated predictive planning models that are linked so as to incorporate feedbacks across sectors and land uses throughout the Province, starting with the GGH. The framework should immediately include Agricultural System information and should be updated once the Agricultural System is fully ground-truthed locally.

In closing, while we cannot provide our endorsement for your four proposals, we offer our recommendations in the spirit of promoting enhanced paths of sustainable prosperity for Ontario. We commend the government for pursuing managed land planning, and we support the government's priority for sending the message that Ontario is "open for business" but only if economic growth today does not come at the expense of the farmland that we all depend upon for sustained prosperity. We would like to end by repeating the fact we have written many times in letters to government: once farmland is developed, it is lost forever—in perpetuity—which is a cost without bounds not only to the sector but to food security.

Thank you for your consideration of our comments.

Sincerely,



Clarence Nywening, President
Christian Farmers Federation of Ontario
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CC: Hon. Doug Ford, MPP, Premier of Ontario
Hon. Ernie Hardeman, MPP, Minister of Agriculture, Food and Rural Affairs
Hon. Rod Phillips, MPP, Minister of Environment, Conservation and Parks
Hon. John Yakabuski, MPP, Minister of Natural Resources and Forestry
Hon. Todd Smith, MPP, Minister of Economic Development, Job Creation and Trade
Hon. Caroline Mulroney, MPP, Attorney General
Ms. Cordelia Clarke Julien, Assistant Deputy Minister, Ontario Growth Secretariat, MMAH
Dr. Dianne Saxe, Environmental Commissioner of Ontario
Ms. Kathryn Enders, Executive Director, Ontario Farmland Trust
Mr. Keith Currie, President, Ontario Federation of Agriculture
Dr. Anne Bell, Director of Conservation and Education, Ontario Nature