



LONG-TERM THINKING FOR TODAY'S ISSUES

July 31, 2020

Sandra Bickford
Acting Director
Growth Management Strategic Policy, Innovation and Partnerships Branch
Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
College Park, 23 Floor, Suite 2304
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Toronto, ON M7A 2J3
Via email: sandra.bickford@ontario.ca; growthplanning@ontario.ca;

Re: ERO 019-1680 Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe

Dear Sandra Bickford,

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.

The Greater Golden Horseshoe (GGH) is a dynamic region of the province, particularly for the agri-food sector. This region has some of Ontario's best quality farmland, climactic conditions and water resources for food production. This also happens to be right next to a significant population which provides the workforce for further processing and marketing farm products, as well as a significant market for those goods. However, this close relationship also creates challenges, most especially from development pressure, including demand for aggregate extraction. Growth planning in this region is in part intended to ensure that growth is managed and directed in such a way as to best allow agriculture to continue to flourish as an economic driver in the region.

The CFFO is concerned about the long-term protection of our province's farmland, especially in regions where the most productive farmland also faces significant development pressure, as is the case in many parts of the GGH. These growth areas are also under pressure for aggregate resource extraction. The CFFO sees a significant role for agriculture in the region as part of ensuring ongoing food security and as aiding in economic recovery.

Our farmland is a limited valuable resource. It provides a long-term renewable source of human sustenance and vital environmental goods and services. Productive farmland is also the foundation of Ontario's agri-food industry, which, according to the government's own numbers, "contributes \$7.6

billion to the GDP.”¹ Our productive farmland is the foundation of agri-food in Ontario. It requires strong protections from degradation and permanent loss to aggregate extraction and settlement expansion.

Timing of Changes to A Place to Grow

This is not the time to extend the planning horizon from 2041 to 2051. We are currently in a time of significant flux. Patterns of social behaviour, doing business and migration are all changing. Where people live and work, how they travel, and what they do for recreation are all likely to change, as well. It will be important for municipalities that growth forecasts in the region are as accurate as possible. Looking further into the future from an uncertain present is unlikely to be productive in achieving that goal.

Agriculture as a Key Economic Driver in Ontario

While everything, including what and where people are eating, is changing, some things do remain the same. People still need to eat. While some agri-food markets have diminished, other opportunities have sprung up in their place. We have seen a resurgence in interest in local food, with an underlying concern for greater self-sufficiency in food production and processing within the province.

In the past, agri-food has proven to be a resilient part of the economy in the face of economic downturns. Furthermore, Canada has opportunities as a net food exporting nation at a time when there is likely to be increasing international need and demand for food. With over 200 commodities produced in Ontario and some of Canada’s highest quality and productive farmland, Ontario should be capitalizing on the economic opportunities that agri-food presents as a key aspect of our overall economic recovery plan.

Planning Horizon and Growth Planning – 1.2.3, 2.1, 2.1.1, 5.2.4

The CFFO is concerned about the proposal to extend the planning horizon from 2041 to 2051 and the proposed change to insist that municipalities may adjust forecasts higher but never lower than those established in the *Growth Plan*. Both of these measures are likely to drive population and employment projections higher than necessary. One of the key impacts of projections that are too high is allocating more land than necessary for settlement area expansion and development, which often comes directly at the cost of productive farmland.

Analysis of the impact of growth planning projections within the region to date indicate that in most municipalities within the region, growth and job projections from the *Growth Plan* have been too high.² This means that more land than necessary has already been allocated for development in these regions through the current Municipal Comprehensive Review process. There is, therefore, no need to make the changes proposed in Proposed Amendment 1, which are only likely to drive this overallocation even further.

¹ Office of the Premier, “Ontario Provides Additional Support for Farmers,” July 16, 2020, <https://news.ontario.ca/newsroom/en>.

² Kevin Eby, “Population Forecasting in the GGH: A Comparison of the *Growth Plan* Population Forecasts and the Ministry of Finance Population Projections,” Friends of the Greenbelt Foundation, March 26, 2020.

It is important that our limited prime agricultural land is protected and dedicated to food production, especially in areas where development pressure is high. Farmland has important economic and environmental benefits that need to be respected and protected, similar to other natural features.

Where growth does need to be accommodated, the CFFO supports greater efforts to ensure successful brownfield redevelopment within existing built up areas, especially close to transit and other key infrastructure. We see this as a vital part of successfully creating complete communities and also helping to prevent loss of valuable productive farmland.

Habitat of Endangered and Threatened Species – 4.2.8

The CFFO has serious concerns about aggregate extraction being permitted in protected habitat of endangered and threatened species within the *Growth Plan* area. We do not support this proposed change.

Cultural Heritage Landscape Definition – 7.0

It is important that any definition of protected landscape that may affect working farms continues to protect normal farm practices and ongoing changes to farm buildings, windbreaks and other landscape features that are part of working farm operations. Independent land owners should not be held responsible to protect views or vistas at their own cost.

Ecological Function Definition – 7.0

The CFFO does not support the proposed changed definition. The language of the current definition is more specific, including reference to “hydrologic functions” and “chemical,” and should be retained.

Municipal Water and Wastewater Definition – 7.0

The CFFO is concerned that by adding “including centralized and decentralized systems” to the definition of “Municipal Water and Wastewater Systems” that decentralized systems will be used where they will cause undo risks and sprawling development. We would like to see emphasis placed on centralized systems in municipal water and wastewater systems, particularly within this region of the province.

On-Farm Diversified Uses Definition – 7.0

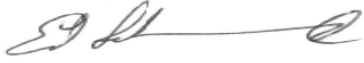
The CFFO is concerned about protecting specialty crop land and prime agricultural areas for production of agricultural products. While the current guidelines recommend that not more than 2% of a parcel, or not more than 1 ha, can be used for on-farm diversified uses, the CFFO is concerned that, because these are guidelines only, the result may still be ground-mounted solar projects that cover a larger area, thus removing prime agricultural land from agricultural production.

Conclusion

The CFFO wants to see strong protections on our productive agricultural land through growth planning, including *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. Productive farmland is the foundation of Ontario’s agri-food industry, which has the potential to be a significant driver for economic recovery and greater food security in the province. This is not the time to extend the planning horizon to 2051, thus putting even more productive farmland in the region to be slated for permanent loss to sprawling development.

We appreciate your consideration of our concerns and comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Scharringa', with a long horizontal flourish extending to the right.

Ed Scharringa, President
Christian Farmers Federation of Ontario