

February 20, 2019

Charles O’Hara

Ontario Growth Secretariat

Ministry of Municipal Affairs

777 Bay Street

c/o Business Management Division

17th floor

Toronto, Ontario M5G 2E5

Re: EBR Posting # 013-4505

Dear Mr. O’Hara,

Thank you for the opportunity to comment on the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe 2017. The GHFFA has an ongoing interest in this process.

The Golden Horseshoe Food and Farming Alliance (GHFFA) is a partnership between Regional Municipalities and the Cities of Toronto and Hamilton, the farm community and organizations in the Golden Horseshoe that seek to grow and enhance the food and farming cluster of the region. The Alliance is responsible for the implementation of the **Golden Horseshoe Food and Farming Action Plan 2021** which identifies pathways for a more integrated and coordinated approach to food and farming in the region.

Since the implementation of the Action Plan, the Alliance has been instrumental in advocating for significant prograss at the Provincial and Municipal levels in the development of policy and guidelines in planning for:

On Farm Secondary Uses

Edge Planning

Harmonization of policies regarding agriculture in the Greenbelt, Oak Ridges Morraine Plan, Niagara Escarpment Plan and the Growth Plan

Protection of Prime Agricultural Lands through the implementation of the Agriculture Systems Mapping

Urban Agriculture Initiatiives including ongoing input to Rouge National Park

Small Plot Farming Policies

Our organization have held workshops to help educated planner and economic developers in the Greater Golden Horseshoe to understand the role that agriculture and food production and food processing plays in driving a healthy regional economy.

**Settlement Area Boundary Expansions**

We were encouraged in the Growth Plan that stricter regulation around settlement boundaries would prevent the ongoing issue of sprawl that continues to plague the Greater Golden Horseshoe. While many assume that Ontario has lots of land for agriculture, 5% of Ontario’s land base is currently capable of supporting agricultural production. Between 2011 and 2016, Ontario lost 319,700 acres of agricultural land or the equivalent of 175 acres per day. That land was lost to residential and industrial uses.

The proposed amendment would make it easier for municipalities to sprawl out instead of up putting increased pressure on agricultural lands, natural heritage features and Greenbelt designations. Adding a 40 ha. piece to a municipal boundary outside of a MCR can add up over time to significant sprawl. Canada has a trade deficit in food and we import over $9 Billion dollars of food per year. We currently process 65% of the agricultural production of the province in food processing companies mostly located in the Greater Golden Horseshoe. Should we continue to lose farmland at this unsustainable rate, the food processing companies and the jobs they create will leave Ontario as well.

While boundary expansions can seem to be a solution to lack of housing, it will have unintended and severe consequences on food and farming. Currently the Holland Marsh grows enough carrots to supply every person in Canada 5 lbs. of carrots per year. Bradford is also one of Ontario’s fastest growing municipalities. Without significant controls on growth, the Bradford Marsh lands could be growing their last crop–houses.

Prime Agricultural lands should not be designated as “Vacant, unbuilt but developable lands”. Agricultural lands should be treasured and protected with the same fervor and protections as natural heritage lands.

**Intensification and Density Targets**

The 80 residents and jobs/ha target in the 2017 Growth Plan allowed municipalities to not include employment areas, freeways, railways, pipelines, hydro lines and cemeteries in their density target calculations. In reality, this allowed municipalities to intensify at or near the previous target (2006) of 50 residents and jobs/ha. Intensification should be the end goal for all municipalities in order to make transit systems viable.

Complete communities were envisioned in the growth plan. Those complete communities were built around transportation hubs. Without well located transportation hubs in intensive built up areas, residents will still rely on the car and congestion will continue to choke access for residents and business.

Unlocking new greenfield sites will not solve the housing problem of the “missing middle” and will only encourage more single family homes where developers can make the maximum profit. Incentives should be given to communities that decide to invest in redevelopment and intensification to serve the rental and row housing markets close to transit.

It is too soon to roll back intensification targets and give developers and municipalities a free hand to build what they want, where they want. Strong provincial guidelines are required for intensification to work.

**Small Rural Settlements**

We welcome the recognition of the small rural settlements as areas that will not face significant growth pressures. If these small settlements are not allowed to grow at all, communities that were long established were destined to a long painful death. By recognizing that a limited amount of growth can occur in smaller hamlets, these small centres can continue to be the heart of a rural community and provide very basic services to their residents.

**Agricultural and Natural Heritage Systems**

Although our organization supports the implementation of the Agriculture System approach to the protection of agricultural lands, we recognize that there are some discrepancies between work that has been done at the Regions through LEARs and the provincial mapping. While it was not clear how these discrepancies would be resolved, this amendment allows for a process where local input can be made to the provincial mapping at the time of an OP.

The new clause that the Province can review and update the ag system or the NHS in response to a municipal request could have negative implications. We would suggest that these requests can only be made at the time of a Growth Plan review – similar to what happens at the NEC or Greenbelt Reviews. In this way, all requests would be weighed against the exact same criteria and municipalities would not be able to initiate a request without significant effort.

While we have clearly seen a commitment to protection of land, water and air in previous Growth Plan documents, the emphasis to place the highest level of protections for natural heritage and agricultural lands, seems to be taking a second seat to “barriers to growth, supply of housing, creation of jobs and market demand”. Given the fact that developers were the significant majority at the recent consultations, it is understandable that this is the language that is proposed. We must emphasize the value of agricultural lands and natural heritage systems to the province. Once they are replaced, they are not coming back.

**Employment Planning**

At a recent meeting of CEO’s of Food Processors in the GGH, it was stated that the biggest threat to their operations (after the high cost of hydro) is the conversion of industrial lands to mixed use. Over time, mixed use is converted to residential and the industry no longer has protection from resident complaints of noise, smell and traffic. Bringing the identification of these employment zones to the province will bring consistency across municipalities and should ensure long term protection for food processing industries.

On behalf of the Board of the Golden Horseshoe Food and Farming Alliance, I would like to thank you for this opportunity to comment and look forward to helping shape the actions that we feel will move this province towards a more vibrant agri-food sector and support the future of agriculture and the food processing industry in Ontario.

Sincerely



Bill Hodgson

Chair,

Golden Horseshoe Food and

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