

October 21, 2019

Planning Consultation

Provincial Planning Policy Branch

777 Bay Street

13th floor

Toronto, Ontario M5G 2E5

Re: EBR Posting # 019-0279 -Provincial Policy Statement Review

Thank you for the opportunity to comment on the Proposed Policy Amendments to the Provincial Policy Statement. The Golden Horseshoe Food and Farming Alliance 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 progress 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 Initiatives including ongoing input to Rouge National Park

Small Plot Farming Policies

Our organization have held workshops to help educated planners 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.

**Market Based Housing Supply and 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 policies of the 2014 PPS required municipalities to plan for the provision of a range and mix of residential units. This requirement remains in the proposed revised policies but there is a new emphasis on the provision of a “**market-based**” range of housing supply. There are no definitions, guidelines or parameters to determine when and how **market-based** needs are assessed and when these needs will lead to the justification for urban (settlement area) boundary expansion (1.1.3.8). In our opinion, should it be determined, that there is little demand for more intensive housing or redevelopment, additional sprawl will occur for single family dwellings outside the urban boundary. As it stands, **market-based** is a problematic term leading to uncertainty and political interference in long term planning principles and continued urban sprawl in the Greater Golden Horseshoe. In our view “**market informed**” would be preferable wording.

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.

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 for long term growth are required for intensification to work.

**Climate Change**

The new proposed policies show a greater emphasis on the need to acknowledge and respond to the impacts of climate change. At the same time, the policies are silent on how and what should be contemplated for action.

More severe weather events will continue to have impact on floodplains and waterways. Development must be steered away from these areas and current wetlands must be maintained to act as sinks for flood events. Fragile lands that are subject to erosion should be protected to prevent downstream discharge of sediments and pollutants into the water air and land of the Great Lakes.

The changing seasonal nature of runoff may mean that tile drainage management may become critically important in managing water quality and quantity. Municipalities have responsibility to maintain a system of municipal drains that eventually empty into lakes, rivers and streams. Well maintained Municipal drains and other infrastructure (eg. Ditches, roads and culverts) are key to responding to the impacts of climate change on agricultural lands within a municipality.

Reference should be made to ensuring that the natural heritage system is restored where possible, to include increased tree canopy, hedgerows and bio-swales. “A healthy natural heritage system has the capacity to resist the spread of invasive species and pests that can pose significant challenges for agriculture”. (Durham Agriculture Sector Adaptation Strategy 2019).

**Weakening Language of the PPS**

Many instances in the proposed changes, the language of the PPS has been weakened from “shall” to “should”. Policy 1.1.3.6 for example uses a “should” where shall has been in the previous policy. This happens throughout the proposed changes and serves to weaken the strength of the provincial policies. For consistent interpretation, the stronger shall is preferred. In many cases, this change in wording has shifted the planning from a municipally led process to a developer led one. Please revert to previous wording in policies 1.1.3.6, 1.1.3.7 and 1.6.7.2.

**Recognition of Agricultural Lands when expanding settlement areas**

Policy 1.1.3.8 contains the problematic language of “to satisfy market demand”. In addition, no mention is made of agricultural lands that could be slated for development. No mention is made of Agricultural Impact Assessments which to date, have taken a variety of approaches as there is no standardized protocol. The Agricultural Impact Assessment must be strengthened and given appropriate standing as well as mention in the PPS. The AIA must be done by qualified agricultural professionals for the highest protection of agricultural lands.

Policy 1.1.3.8 (c),(d),(e) proposes no changes to (c) and (d). The wording added to 1.1.3.8 (e) strengthens the PPS by adding words “avoided, and where avoidance is not possible, impacts are minimized and mitigated”. The GHFFA supports these changes.

**Buffering and Edge Planning**

As development moves towards agricultural operations in prime agricultural lands, consideration should be given to buffer or mitigate the impacts of a settlement expansion. Successful buffering would help avoid complaints from odor, noise, dust and other impacts arising from normal farm practices. Buffering should always be the onus of the settlement expansion and can be in the form of tree plantings, vegetative buffers, roads, storm-water ponds or parklands.

**Land Use Planning and Transportation**

Policy 1.6.7.5 from the 2014 PPS has been dropped. Current and future transportation needs are strongly tied to land use and can have significant impact on prime agricultural areas and farm fragmentation. It is impossible to plan a new transportation corridor without consideration to the impact on agricultural lands. This proposal seems to be in conflict with the Growth Plan which promotes transit supportive development. We cannot agree with this proposed policy and strongly recommend that policy 1.6.7.5 from the 2014 PPS be retained.

**Agricultural and Natural Heritage Systems**

Our organization supports the implementation of the Agriculture System approach to the protection of agricultural lands. As the PPS is a provincial policy document, it is our view that the Agriculture System should be extended across Ontario for the further protection of prime agricultural lands in the entire province. While the GGH is experiencing the highest pressure for development lands, similar pressure is being exerted on agricultural lands in growing municipalities large and small across Ontario.

Section 2.3.2 states in the second paragraph that “Planning authorities are encouraged to use an agriculture system approach”. We recommend that this wording be changed to “Planning authorities **shall** use an agriculture system approach”. This would provide consistency across the Greater Golden Horseshoe and further strengthen the protection of agricultural lands and the businesses within the agriculture system.

Both the proposed PPS and the Growth Plan require that when examining Settlement Area boundary adjustments, the impact on the agricultural system be addressed, but the proposed PPS does not reference key hydrologic features or the natural heritage system. **It is recommended that natural heritage and hydrologic systems be added as criteria for consideration in the adjustment of Settlement Area boundaries to ensure that the review is systematic, well-planned and comprehensive.** This systematic evaluation of settlement area boundary expansions avoids a piecemeal and inconsistent approach.

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 in the proposed policies of the PPS, 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.

**MDS**

While it could be argued that the removal of references to MDS in 2.3.6.1 is simply removing a redundancy of wording that currently exists in 1.1.3.8, leaving the reference to MDS serves, in the new policies, to remind urban planners that prime agricultural land and livestock operations must be treated differently that other lands.

**Aggregate Extraction**

Policy 2.5.2.2 has had a further description for extraction in natural heritage features outside the Greenbelt area. Natural heritage features should be treated the same whether in our out of the Greenbelt area. There should be no extraction in significant wetlands, woodlands, valley lands, wildlife or fish habitat or significant areas of natural and scientific interest or coastal wetlands whether they are in the Greenbelt or not. In these instances, aggregate extraction cannot demonstrate that there will be no negative impact on the natural features or their ecological functions.

**Farm Fragmentation**

While some may be advocating for the reinstatement of the “farm retirement lot” that was removed from the PPS in the 2005 version, the Golden Horseshoe Food and Farming Alliance cannot support this move. Increasing the number of rural residential lots further fragments the agricultural land base and leaves the farmer open to complaints about noise, odor and other normal farm practices. That being said, municipalities should give some thought to encouragement of secondary dwellings for multi-generations and farm help within the farm cluster or existing building footprint. Temporary dwelling restrictions lead to “second class” living conditions for family members or farm help. Shared wells, septic and a restriction against future severance could accommodate many issues that families face during farm succession.

The Golden Horseshoe Food and Farming Alliance welcomes the opportunity to comment on the proposed policy changes to the PPS. We look forward to the continued protection of agricultural lands through these changes.

Sincerely,



Johanna Downey

Chair, Golden Horseshoe Food and

Farming Alliance

cc. The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs

 Golden Horseshoe Food and Farming Alliance Board of Directors