



WELLINGTON FEDERATION OF AGRICULTURE

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The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, Ontario, M7A 2J3

July 10, 2023

Sent via email to: minister.mah@ontario.ca
and submitted online through the Environmental Registry of Ontario

Re: ERO 019-6813 - Review of proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument.

Dear Minister Clark,

The Wellington Federation of Agriculture (WFA) is the largest farm organization in the County of Wellington with over 1500 members. Wellington County is a hub of agricultural innovation, research, and leadership in the province. The primary agriculture sector in Wellington County plays a crucial role in the economy by contributing \$841 million to Ontario's GDP and employing over 12,260 people. Wellington County accounts for a notable portion of the provincial agricultural supply chain, too, producing 5.8% of 2021 provincial farm cash receipts. Protecting and preserving the highly productive agricultural land for the purpose of growing, harvesting, and producing food is the Wellington Federation of Agriculture's (WFA) priority.

We would like to take this opportunity to express our concerns about the proposed Provincial Planning Statement. WFA appreciates that the pause button has been pushed on the lot creation policy on agricultural land originally proposed within the statement but emphasize that the delete button must also be pushed.

WFA supports OFA's position that farming to produce food, fibre, fuel, flowers, and nursery stock is the best use for farmland. Ontario's limited supply of farmland is a scarce resource, making up less than five percent of all the land in the province. It's vital that Ontario has a strong, viable and sustainable supply of food products grown, harvested, and processed right here at home. Ontario's shrinking agricultural land base is alarming. The current rate of loss is measured at 319 acres per day in our province, according to the 2021 Census of Agriculture. These losses are not sustainable.

According to a recent study commissioned by the WFA, Wellington County accounts for 3% of Ontario's total prime agricultural land and as the county is positioned equidistance from the great lakes it has the soil quality, growing conditions in heat units and weather conditions that creates excellent growing conditions for agricultural crops. To read the full Agri-Food System Study [here](#)

WFA endorses the 2020 Provincial Policy Statement (PPS 2020)'s Agriculture policies [Section 2.3] that require municipalities protect their prime agricultural areas for their long-term agricultural use.

We further support the flexibility afforded to farmers to engage in on-farm value adding of primary farm products, as well as agriculture-related, on-farm diversified, and agri-tourism uses.

**Wellington County has an “agriculture first” definition in their Official Plan –
“In Prime Agricultural Areas, all types, sizes and intensities of agricultural uses and normal farm practices will be promoted and protected in accordance with provincial standards.”**

Although the PPS 2020 defines prime agricultural land as Canada Land Inventory (CLI) Class 1-3 soils plus specialty crop areas, the WFA believes that prime agricultural lands should be defined as Class 1 to 4 soils plus specialty crop lands. The productive capacity of Class 5-6 soils plays an important role in the increasingly high cost of farmland and should be protected as part of agricultural production. This soil can support agricultural activities such as agricultural related uses, grazing livestock, or growing crops for biofuels. We believe strongly in the PPS 2020 Agriculture policies that govern farmland and rural areas protecting the right to farm and the Agriculture System in Ontario.

WFA believes strongly that the fragmentation of farmland in the rural area is counterproductive for the agricultural business structure in our rural areas. Fragmentation creates conflict over land use, travel and road use, MDS provisions that hinder business growth and overall productivity and viability of the agricultural sector. WFA is against the removal of the requirement to use the provincially mapped agricultural system as it would allow for agricultural fragmentation, inconsistent classification of agricultural lands and specialty crop areas and disconnect in agricultural land mapping and classifications across municipal boundaries.

Settlement Area Boundary Expansions

WFA supports OFA’s position that strongly opposes the proposed changes to settlement area boundary expansion policies. Specifically, changes in functional policy language have removed both the requirement to justify need and to conduct a comprehensive review, as such could result in uncertainty and ambiguity for the process, expectations, and requirements for these expansions.

WFA has worked closely with our County Planning staff to review outdated, beneficial, and missing policies around agricultural land use throughout the County to create a safe and productive business environment in the agricultural areas.

WFA strongly supports long term land use planning that creates a fixed, permanent urban boundary with a greenfield buffer zone to safeguard agricultural resources, thereby reducing conflicts between different land uses and ensuring the long-term viability of agricultural land.

Land use planning should not be based on a 4-year political cycle.

Recent Provincial additions of urban boundary expansion in Wellington County as mandated through Bill 97 see lands that were not identified through the technical land review conducted by the County. The lands leapfrog over identified lands to create irregularly shaped urban boundaries that reach up and out into productive agricultural lands. Furthermore, the extension of urban development into agricultural lands will result in additional costs for providing necessary infrastructure and services to these newly created parcels. It will require extending utilities, transportation networks, and other amenities into areas that were not originally planned for urban development. These costs can be significant and will place strain on resources and budgets.

Urban growth should be accomplished through redevelopment of vacant and underused lands, and higher density development. Higher density development should be mandated provincewide to take full advantage of existing infrastructure as one way to protect agricultural land and create complete

communities. Expansion onto abutting agricultural lands should only occur after exhausting redevelopment of underused or vacant areas within their existing urban boundaries. This would include the rehabilitation and redevelopment of both “greyfield” and “brownfield” sites.

There are opportunities within existing smaller villages, hamlets, and towns to increase density on parcels of land in the settlement area that are adequate for servicing and more efficiently contribute to the rural tax base. This would serve to eliminate the need for lot severances on agricultural lands while providing increased housing options across Ontario.

As Ontario becomes more urbanized, councils and staff may not apply an agricultural lens to their plan-, policy-, and decision-making. This is critical as we need to plan for 'farm-friendly' urban development that promotes compatibility at the urban-agricultural interface. For example, parcel size, configuration, building setbacks, road patterns, institutional locations, drainage patterns and location of municipal servicing will all have implications for agriculture.

WFA firmly believes in the widespread use of AIAs, as it ensures that agricultural uses continue, and normal farm practices are protected. AIAs identify opportunities to increase compatibility between agricultural and non-agricultural uses by looking for ways to avoid, minimize, then mitigate adverse impacts on agricultural operations and the Agricultural System.

Lot Creation and Additional Residential Units

WFA recognizes the need for housing while balancing farmland protection in the rural areas. While WFA does not support further lot creation and severances, we do support additional residential units on existing farm parcels, and in rural hubs, hamlets, and communities to support our agricultural system.

While WFA is supportive of additional residential units, we do feel there needs to be further specificity in the policy. There is a distinct lack of inclusion for the type, size, scale, and location of these proposed ARUs that needs to be addressed as well as the clarification on whether this policy is exclusive to farm lots or includes rural lots of a specified minimum size.

WFA supports OFA’s vision that sees the opportunities to build more rural housing should be concentrated within, and directed to, rural settlements and settlement areas as identified in APTG (A Place to Grow) Policy and PPS (2020) Policies 1.1 “Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns,” 1.1.3 “Settlement Areas,” 1.1.4 “Rural Areas in Municipalities.” Density and intensification targets should be analyzed and identified in accordance with APTG methodology and appropriately applied to rural settlements and settlement areas. Within rural lands, OFA recommends that agricultural uses, agriculture-related uses, on-farm diversified uses, and normal farm practices should be protected and given higher priority as permitted uses under PPS (2020) Policy 1.1.5.2 and throughout Policy 1.1.5 “Rural Lands in Municipalities.” OFA previously requested that this proposal be applied to rural and smaller-town municipalities within designated rural settlements and settlement areas. We acknowledge the servicing capacity limits many rural communities in Ontario face, such as that with private water and wastewater services. However, rural communities also need additional housing.

Employment Lands

WFA believes that the alternations to the definition and policies for Employment Lands proposed in the Planning Act amendment in Schedule 6 of Bill 97 will reduce protections for Employment Lands. This will result in increased pressure to utilize agricultural lands such as Prime Agricultural Lands and

Specialty Crop Areas for employment uses in the future as well as put agricultural processing operations at risk.

Municipal Flexibility

WFA believes that the PPS should be used as a baseline and remove the provisions that limit the flexibility of municipalities. Municipalities vary across the province, and it is WFA's belief that Wellington County - in consultation with their local tiers - should be allowed to be more restrictive within the local policy so long as it is in accordance with provincial policy.

Agricultural Impact Assessment

While we are very happy to see that Agricultural Impact Assessment (AIA) is included in the definitions, we do believe that an AIA must (not should) be completed under section 2.3 Settlement Areas and Settlement Area Boundary Expansions. We are pleased to see the requirement for "avoiding, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment..." in section 4.3.5 Non-Agricultural Uses in Prime Agricultural Areas. We are also very pleased to see the application of 4.3.5.2 applied to Mineral Aggregate Extraction in Prime Agricultural Areas under 4.5.4.1.a. Avoiding impacts to agricultural areas from mineral extraction is an important protection of Ontario's limited agricultural lands.

WFA is very pleased to see the requirement for an AIA or equivalent analysis for mineral extraction in prime agricultural areas, yet we remain concerned there are circumstances in which "complete rehabilitation to an agricultural condition is not required..." As established in 4.5.4.2. It is our belief that an application to extract minerals in prime agricultural areas that cannot be rehabilitated to an agricultural condition should not be approved on the basis that it does not meet the conditions of that application.

Natural Heritage & Water

WFA supports OFA's beliefs that the Provincial Planning Statements should not remove the words "all municipal" from section 4.2.1(e)(1). We believe that this section should remain "Implementing necessary restrictions on development and site alteration to: 1. Protect all municipal drinking water supplies and designated vulnerable areas; ..."

OFA believes that the definition of "Wetlands", as it currently exists in the Provincial Policy Statement, 2020 should remain.

Wetlands: means lands that are seasonally or permanently covered by shallow water, as well as lands where the water table is close to or at the surface. In either case the presence of abundant water has caused the formation of hydric soils and has favoured the dominance of either hydrophytic plants or water tolerant plants. The four major types of wetlands are swamps, marshes, bogs and fens.

Periodically soaked or wetlands being used for agricultural purposes which no longer exhibit wetland characteristics are not considered to be wetlands for the purposes of this definition.

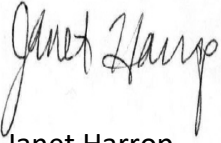
WFA shares OFA's interest in looking forward to reviewing the proposed natural heritage policies when they are released.

WFA shares OFA's concerns that combining A Place to Grow: Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement, 2020 would diminish the protections and support for agricultural lands and community and therefore open the floodgates for a rash of developments that run counter to our overarching philosophy of farmland preservation which is paramount to our

mission of “Farms and Food Forever.” We request that there be the inclusion of greater specificity and guidance on these proposed policies as well as greater consideration for agricultural land, operations, and community.

WFA appreciates the opportunity to provide our feedback and agricultural perspectives on the proposed Provincial Planning Statement. We look forward to working with OFA and our municipal counterparts to protect Wellington County’s highly productive farmland, growing a sustainable housing supply, and creating complete communities.

Sincerely,



Janet Harrop
President, Wellington Federation of Agriculture

Cc via email:

The Honourable Lisa Thompson, Minister of Agriculture, Food, and Rural Affairs

Peggy Brekveld, OFA President

Cathy Lennon, OFA General Manager

Mark Reusser, OFA Regional Director

Dufferin Federation of Agriculture Board of Directors

Waterloo Federation of Agriculture Board of Directors

WFA Board of Directors

Councillor James Seeley, Chair of Planning and Land Division Committee, Wellington County

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