

June 19, 2023

To: Ontario Federation of Agriculture

Attention: Peggy Brekveld, President OFA

From: Tom Dolson

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

I would like to take this opportunity to comment on your draft response regarding ERO 019-6813. There are several statements made in the draft letter that require further clarification, some appear to be contradictory, and some important facts and observations have not been addressed that are vital to building a sustainable future for farmers in Ontario. I will address my comments in the order of which they have been covered in your most recent draft response received on June 12, 2023.

**1- The current rate of loss is measured at 319 acres per day in our province, according to the 2021 Census of Agriculture.**

OFA continues to give the impression that this loss is primarily due to urban development which is not the case. In one of your own workshops at the AGM last November, it was revealed that over a 17-year period, the loss to urban development was in the 11 acre per day range. Using census figures to determine loss of farmland is far from an exact science. The changes to how farmland have been reported throughout the past number of Census periods as well as the actual numbers of farmers who have reported have not been addressed by OFA.

While any farmland lost within the province warrants further research and inspection, the OFA owe it to their membership to determine where and why such losses are occurring and what steps can be taken to address these losses. The pasture component alone in the Census calculations is in the neighbourhood of one million acres lost. Furthermore, Ontario shows an increase in number of acres under cultivation. There seems to be a total lack of transparency on why we are losing farmland and what we are doing to address the issue.

**2- ...but it is another thing to think seriously about how we will feed this increased population.**

The premise here is that with the proposed increase in population, we will be faced with food security issues. Food security may be a difficult issue to address when seventy percent of our crop production is exported. Throughout Covid 19, Ontario faced numerous challenges to our supply chain which spurred innovation within our fruit and vegetable sector and our processing and packaging sectors to name just a few. As we pivot to more locally grown food through innovation, Ontario farmers have an opportunity to serve a growing population and benefit from retaining an increased market share of our consumers' grocery budget.

**3- Fragmentation is counterproductive for the agricultural business structure in Ontario's rural areas.**

I agree with OFA that increasing the number of rural severances can create pressure on our farm businesses, but I am not in agreement that OFA adopts the stance of an outright refusal.

Without a doubt, increased severances in rural areas will pose significant challenges to existing and expanding livestock operations. Will we need to revisit the current MDS guidelines or should the owners of new severances agree to some type of an acknowledgment that could be put on title that they will not object to normal farm practices on the surrounding farm?

In many circumstances farm severances support the succession of the family farm. In 1970, my mother was widowed in her 40's when my brother and I were 14 years old and 9 years old respectively. Through the sale of the allowed 3 one acre lots per 100 acre parcel, we had the resources to hold onto the farm until such time that we were both old enough to farm. We both maintain farming operations to this day.

The increase in farmland values is another reason to support farmland severances. It is virtually impossible for one sibling that is a non farmer to buy out the other sibling's share of a farming enterprise upon the death of a parent. Upon reaching such an impasse, the land is often sold to settle an estate and the farming sibling is forced to exit the industry.

When farms such as previously mentioned or any other 100- acre or 200-acre farms are bought and absorbed into larger farming enterprises, it is not uncommon for the purchaser to demolish the older house and barns on the property to reduce the tax assessment along with his tax bill. This results in a lower assessment for the municipality and an increased mill rate for the existing ratepayers. Such practices result in a net loss of housing in some of our rural areas.

- 4- Your request for all farmland outside settlement areas to be designated as Greenbelt and afforded permanent protection is contradicted by a later statement that "urban areas should only be allowed to expand onto abutting agricultural lands only after exhausting redevelopment....."

The request by OFA to add Greenbelt designation to all farmlands outside of settlement boundaries is a bold step and should not be taken lightly without support from the membership at large.

The approach taken by OFA is short sighted as there is no reference made to employment lands and infrastructure that play a vital part in supporting our rural communities. OFA comes up short by simply directing the province to direct all future growth to urban areas without fully understanding the challenges of doing so. The mayor of Brampton stated last week that they currently have building permits for thousands of apartment units on hold due to undersized wastewater services in an older community that did not anticipate growth of this magnitude in their downtown core. The time required as well as the cost to replace all pipe to the sewer main trunks not only creates a massive increase in housing costs, but it also disrupts local residents and businesses for years to come.

There are other infrastructure deficits within built boundaries such as insufficient storm water retention and catchment areas and a shortage of schools, parks and recreational areas.

Ontario has promoted intensification within our urban boundaries for upwards of 20 years. Throughout that period, a series of unintended consequences have materialized that have had a detrimental impact on the affordability and the availability of housing in Ontario. During Covid 19 many families moved out of our urban areas for reasons of affordability, housing choices, safety from crime and fear of infection and the ability to work from home. A new phenomenon occurred called leaping the Greenbelt whereby new homeowners relocated from the GTA beyond the Greenbelt to Simcoe County to name just one municipality. If OFA insists on their current policy of directing all growth to settlement areas, then our organization needs to offer solutions to some of the problems that currently exist.

#### 5- Re Lot Creation and Additional Residential Units

...we do support additional residential units on existing farm parcels and in rural hubs, hamlets and communities to support our agricultural systems

Many of our small rural communities have experienced a relocation of schools and recreational facilities to larger urban communities. OFA suggests adding units within some of these smaller settlement areas and while acknowledging wastewater issues may come into play on existing neighborhoods, without an expansion to the existing urban boundaries, there will be few positive results. If our members wish to retain vibrant rural settlement areas, those areas must have an opportunity to expand their settlement areas to sustain not only their residents but the rural economy surrounding them. Expanding employment areas are also vital to stimulating the rural economy.

#### Final Summation

The draft letter from OFA fails to recognize the reasons for the proposed changes in planning policy. OFA does not understand the benefits that might be available to our members and offers no alternatives or solutions to some of our current concerns.

I offer these observations personally and as a member of OFA. At the present time I have not had an opportunity to have this letter ratified by our board of directors due to the short timeline for responses to your draft letter.

Sincerely,  
Tom Dolson  
Past President Peel Federation of Agriculture