



Ontario
Home Builders' Association

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October 4, 2017

Helma Gerts
Ministry of Agriculture, Food and Rural Affairs
Food Safety and Environmental Policy Branch
1 Stone Road West, Floor 2
Guelph, ON N1G 4Y2

RE: Release of draft Agricultural System mapping & Implementation Procedures for consultation – EBR 013-0968

Background:

Following two years of consultation, including recommendations from an Advisory Panel chaired by David Crombie, the provincial government released four updated land use plans in late May guiding growth across the Greater Golden Horseshoe (GGH) for the next 25 years. The updated plans contain new Agricultural System references and policies that support the protection of farmland while promoting economic development of the agri-food sector. The provincial land use plans define the Agricultural System as a group of inter-connected elements that collectively create a viable, thriving agricultural sector. It has two components:

1. An agricultural land base comprised of prime agricultural areas, including specialty crop areas, and rural lands that together create a continuous productive land base for agriculture; and
2. An agri-food network which includes infrastructure, services and assets important to the viability of the agri-food sector

OHBA understands that explicit direction will be provided in all Plans to maintain the agricultural land base and connections to the agri-food network. The Ministry of Agriculture, Food and Rural Affairs (OMAFRA) met directly with OHBA members in June and OHBA staff and members participated in regional workshop consultations in August and September. OHBA appreciates the opportunity for direct dialogue regarding the implications of proposed provincial policies and mapping with our members.

OHBA Commentary:

OHBA continues to support the guiding principles of protecting our most valuable environmental resources and the creation of complete communities that are the foundation of the Growth Plan and Greenbelt Plans. Ontario's GGH is one of Canada's economic engines and contains some of Canada's best farmland and natural features. It is also one of the fastest growing regions in the country which is why it is so critical to that the plans work together to provide a broad, long-term planning framework for the region. It is also critical to ensure a clear, transparent and effective public policy framework to guide and support growth while protecting our environment.

As stakeholders in the planning process, we are partners with the government in creating complete, transit-oriented communities, protecting the environment and ultimately implementing the PPS and Provincial Plans. Our comments are intended to assist the government in achieving sustainable growth by providing for housing choice, creating complete communities, attracting employment opportunities, improving inter-plan co-ordination and balancing the Province's economic, social and environmental interests over the long-term.

As part of OHBA's submissions to the province with respect to the Coordinated Review of Ontario's Four Land Use Plans, OHBA supported completing the identification of an agricultural system and related guidance by the end of 2018 and that all mapping be validated by municipalities to ensure accuracy. OHBA recommended in both our 2015 and 2016 submissions that there be an enhanced focus on improving the economic viability of agricultural opportunities for farmers. OHBA was supportive of a number of improvements to the Greenbelt Plan that supports and facilitates a wider diversity of agricultural and agriculturally-related uses that support farming operations and enhance the economic viability of farming.

OHBA further notes that the Province has created a new assessment tool called an Agricultural Impact Assessment (AIA), which is to be completed during the consideration of proposals for non-agricultural uses within non-urban lands. While the policies would indicate that this tool will be supportive of the agricultural industry through considering the impact of proposed development on existing operations (as mapped in the draft Agricultural System Portal), more information and guidance is necessary with respect to study requirements, who is qualified to prepare it, and how it relates to other assessment tools. OHBA is concerned that AIA could be utilized as a tool to discourage or prevent Urban Boundary Expansions when necessary as determined through the Land Needs Assessment at the time of Municipal Comprehensive Review. OHBA recommends that AIA be considered as an important tool when considering where is most appropriate for an urban boundary expansion to occur (when necessary); but that the outcome of an AIA study be balanced among a range of other public policy goals and objectives. OHBA also seeks clarification regarding if AIAs are required for infrastructure ROW expansions/extensions through prime agricultural areas (e.g. hydro and highways) and recommends greater guidance for AIA study requirements with respect to infrastructure. OHBA continues to recommend the Province work with stakeholders and municipalities clarify the elements of an AIA study, including who would be considered a qualified party to conduct an AIA, and who would be a qualified party to review the AIA.

Regarding the Draft provincial mapping of the agricultural land base, OHBA is supportive that at the time of implementation, municipalities will have the flexibility to refine (with greater precision) provincial mapping of the Agricultural System. OHBA notes that the current regional scale mapping by OMAFRA is too large for our members to make informed business decisions. OHBA further supports the municipal requirement to include the agricultural land base component of the Agricultural System as a designation in their official plans through a municipal comprehensive review. OHBA supports the ability for municipalities to have the flexibility to assess candidate areas as rural, agricultural system of prime based on local assessment. OHBA also notes that the mapping portal connected to the Environmental Registry Posting is utilizing an old greenbelt line (does not include the recent revisions - EBR #012-7198) – this should be updated. OHBA supports and continues to recommend that existing Designated Greenfield Areas (DGA) not be included in the mapping.

From a development industry perspective, the agricultural system mapping is important and has a direct link to Employment Areas within the urban area as they also accommodate many agri-food and agri-businesses. It also recognizes that infrastructure, on-farm and agriculture related businesses are equally important elements of a strong agricultural sector. The agricultural system needs to differentiate between services and land-use and recognize that business services evolve over time. The system is a snapshot in time and it is important to recognize that the system and businesses operating within the system will expand, remain, close etc. OHBA supports completing the identification of an agricultural system and related guidance by the end of 2018 and that all mapping be validated to ensure accuracy.

On behalf of our 4,000 member companies, we look forward to ongoing dialogue and consultation with respect to growth, environmental and infrastructure planning across the Greater Golden Horseshoe and the Province

Sincerely,



Michael Collins-Williams, MCIP, RPP
Director, Policy
Ontario Home Builders' Association