

July 31, 2020

Ms. Sandra Bickford

Ontario Growth Secretariat

Ministry of Municipal Affairs and Housing

777 Bay Street

Suite 2304

Toronto, Ontario

M7A 2J8

Dear Ms Bickford;

**RE: ERO 019-1679 Proposed Land Needs Assessment Methodology for A Place to Grow: Growth Plan for the Greater Golden Horseshoe, and**

**ERO 019-1680 Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe**

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 processing and production 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

We appreciate the opportunity to make comment on ERO 019-1679 and ERO 019-1680.

**Protection of Agricultural Lands in Greater Golden Horseshoe is Diminished**

The Greater Golden Horseshoe continues to absorb Canada’s population and employment growth. At the same time, the Greater Golden Horseshoe is where some of the most productive, prime agricultural lands are located. Only 5% of Ontario’s soils are capable of growing the crops that are required to supply a strong and robust food system. The majority of these soils are in the Greater Golden Horseshoe.

The Covid 19 pandemic has demonstrated that the Ontario food system can be nimble and is recession proof. Food systems need both productive land and a food processing cluster to help Canada achieve food sovereignty. Canada’s largest food processing and farming cluster currently exists in the Greater Golden Horseshoe but cannot survive in the future if our best agricultural lands continue to be used for their last crop - housing.

We were encouraged in the Growth Plan that municipalities were directed to grow up not out of their municipal boundaries. The proposed amendments kick the door open to development that will lead to more sprawl and put increased pressure on the remaining agricultural lands. In addition, if some urban communities are allowed to exceed their growth projections, an undue pressure will be placed on the agricultural lands surrounding them. This is not a positive outlook for the future of agriculture and the corresponding food system jobs associated with the processing of sixty percent of Ontario’s agriculture production.

The Alliance feels that the extension of the planning horizon from 2041 to 2051 is not justified at this time. The length of time that will be required for economic recovery from the pandemic is uncertain as is the projected need for housing and employment lands. This extension also serves to endanger “whitebelt lands” currently used for agricultural purposes. Our land studies have been adequate in the past and the land designated has not been needed as our economy has not grown at a rate that could accurately be predicted by the “experts”. A 25-year supply of land is adequate and will not bring unrealistic expectations and speculation to lands that will not be developed within that time frame.

**Keep Rural Ontario Strong**

The Alliance would like to see population and job growth directed into other more rural areas of the province. Further concentration of population in the Greater Golden Horseshoe only leads to more gridlock, sprawling subdivisions, and social issues associated with overcrowding.

Efforts should be made to create clusters of housing and jobs along existing and planned transportation corridors. Covid 19 precipitated the exodus of urbanites escaping from the cities for the country. Their sojourn in the country showed that it was possible to live and work remotely if there were better infrastructure supports such as broadband, lower cost housing and rural jobs. Encouraging growth outside the GGH moves that growth to less capable agricultural soils and keeps rural Ontario vibrant with small businesses, mid-sized industries and residents with high satisfaction of their quality of life.

Increased investment in broadband for rural Ontario will keep all of Ontario strong and vibrant with more people working from home, rural businesses scaling to employ other rural residents and opportunities for growth instead of decay in small rural settlements.

**Aggregate Resources**

It is unrealistic to believe that we do not need aggregates to build our roads, buildings and industries. The closer these aggregates are to the sites of construction, the more reasonable the cost. That being said, we take a short-sighted view if it is “aggregates at all cost” by allowing new aggregate extraction in designated wetlands, prime agricultural lands, natural heritage and habitats of endangered species. Our water resources and species are an infinite resource and should be continued to be protected. No matter how good the restoration of quarries and pits may be, they are never restored to their former state to become high quality agricultural lands.

**General Comments**

Provincial policy is designed to give direction to Regions and Municipalities regarding consistent approaches to planning and Plan policies. Changing wording in the document from shall and shall not to anything else allows interpretation on the local level that will lead to a patchwork of approaches in planning. Provincial policy documents should be written with intention to give clear direction and interpretation to all. Anything else becomes weasel words that allow politics, interest groups and developers to have it their way.

The same principle applies to the proposed rewording of the definition of “ecological function”. Removing the phrase “including hydrologic function, and biological, physical, chemical and socio-economic interactions” weakens the definition and allows for too much interpretation to ignore the real impacts of development. Please restore the definition.

In the Golden Horseshoe we have already seen some interpretation of the definition of “cultural heritage landscape” that demonstrates the subjective interpretation of the term in regard to the agricultural landscape. Agricultural is an ever-evolving industry and as such must not be locked into someone’s romantic notion of what a farm or farmscape should look like. Farmers strive to be efficient and old buildings and fence lines are not always the way for them to remain profitable and maintain productivity. Cultural heritage landscape is a problematic term for agriculture.

Thank you for the opportunity to make comment on the proposed changes. We trust that you will consider our input that pertains to the proposed amendments.

Sincerely,



Johanna Downey

Chair

Golden Horseshoe Food and Farming Alliance

Councillor, Region of Peel

cc. Minister Steve Clark

Minister Sylvia Jones