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642 Woolwich Street,

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November 17, 2017.

Graham Chernoff
Culture Service Advisor
Ministry of Tourism, Culture and Sport
Culture Division
Programs and Services Branch
401 Bay Street
Suite 1700
Toronto Ontario
M7A 0A7

Dear Minister,

EBR 013-0914 – A Guide to Cultural Heritage Resources in the Land Use Planning Process

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

The draft “Guide to Cultural Heritage Resources in the Land Use Planning Process” includes policy that could potentially have an impact on those living in and visiting rural communities. The CFFO suggests that cultural heritage plans aim for minimal impact on agricultural land use, that archeological assessments are completed in a timely manner and finally that rural economic development focus on both year-round businesses and tourism.

Land Designation:

The draft guidelines indicate that farm-scapes may be considered a cultural heritage landscape if they have elements that collectively form an area of cultural significance. The municipal protection of the attributes does not mean that they cannot be altered or removed. These changes are implemented by the collective decision of a municipal council. Should this occur, farmers need to be involved in the consultation process of these municipal council decisions. Landowners need to be clearly informed to ensure they understand exactly what kind of cultural features are located on their land, and how the land and their use of it may be altered should the council deem the land a cultural heritage landscape.

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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Archeological Resources:

The draft articulates that when archeological significance is suspected on a parcel of land, an archeological assessment is conducted. This assessment halts all other land uses until all archeologically significant material is conserved from the area.

All archeological site assessments should be carried out in a timely fashion to ensure land can be assessed in a reasonable time frame. Farmland should not be taken out of commission for long periods of time as this negatively impacts the owner's livelihood. On any sites where further excavation is merited, this also needs to be completed in a timely fashion. Once items of cultural significance are removed and conserved, there should not be a long wait period to return to the previous land use as it was before the assessment

In some instances, land adjacent to a cultural heritage landscape may be deemed unusable and subject to zoning and by-law limits. This occurs when there is potential that a cultural heritage site is situated in more than one area. Cultural heritage features should be preserved so as not to hinder surrounding agricultural land and its productivity

The draft sets out guidelines indicating the land should be returned to its original state after assessment and that future restoration of the site will not be necessary. These guidelines ensure that the landowners do not carry a heavy burden once their land is deemed a cultural heritage site.

In any of these cases where land is taken out of use for an extended period of time, compensation should be directed to the land owner to account for any lost income.

Enhancing the Rural Economy:

The draft guide document outlines how sense of place encourages growth and economic prosperity in rural areas by integrating new comers and maintaining existing rural businesses. Bolstering the existing economy in rural areas by preserving or enhancing existing heritage features will provide a positive effect on the local economy. The CFFO believes that these planning decisions should be made with priority given to attracting new residents, and maintaining vitality for existing residents. This means that planning decisions will not put the needs of tourists before long time residents, ensuring the prosperity of the local businesses year-round. Tourism including agri-tourism has an important role to play in bolstering rural economic and cultural vitality in some areas. However, a local economy overly dependent on tourism can be detrimental to permanent local residents and businesses. For this reason, it is important these planning guidelines focus on both existing economies and agri-tourism.

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Cultural Heritage and Farmland Protection:

Cultural heritage features are an important part of rural areas in Ontario. They often distinguish one area from another, give residents a sense of place, and offer tourists a unique experience. While these areas hold important historical and cultural significance, it is important to ensure that agricultural land is not further depleted by use-restrictions on land deemed of cultural significance. With farmer consultation, timely archeological assessments and proper consideration of local businesses, these draft guidelines will bolster rural economies while preserving the valuable aspects of Ontario's past.

We appreciate this opportunity to respond to this draft guide, and thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Nywening".

Clarence Nywening, President
Christian Farmers Federation of Ontario
BW