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642 Woolwich Street,

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June 14, 2018.

Aidan Grove-White
Manager
Partnerships and Consultation Branch
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay St.
c/o Business Management Division
Floor 17
Toronto, ON
M5G 1Z3

Dear Aidan Grove-White,

ERO 013-2359 - Guidance to Support the Implementation of the Growth Plan for the Greater Golden Horseshoe, 2017: Application of the Intensification and Density Targets & The Municipal Comprehensive Review 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 CFFO supports the goal of setting intensity targets within the Growth Plan area of the Greater Golden Horseshoe region. These will help to ensure our settlement areas intensify within their current boundaries, ensure currently designated greenfields will be developed to accommodate growth over a longer period of time, and limit future sprawl into rural areas. This helps to protect our productive farmland which is found throughout the region, often abutting currently settled areas.

The proposed guidance documents have included appropriate consideration of current provincial policies, including the new Agricultural System policies, addressing the impact of development on farmland within this fast-growing region that also houses significant high-quality productive farmland. It will be important that as Municipal Comprehensive Reviews are completed and reviewed by the province, that the provincial interest in protecting this farmland and viable food and farming businesses is enforced.

Agricultural Systems

The proposed guidance documents, including the “Application of the Intensification and Density Targets” and the “Municipal Comprehensive Review Process” have appropriately included guidance on meeting provincial policy requirements including

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the Agricultural System policies and on protecting the provincial interest in protecting and supporting agriculture.

It is important that municipalities consider the province's Agricultural Systems mapping and Agricultural Impact Assessment guidelines before they make decisions about where settlement areas will expand. Municipalities need to choose sites on land that is less suitable for farming and will not jeopardize the viability of surrounding farm businesses.

The CFFO expects that the Agricultural System mapping within the GGH region will also help municipalities to appropriately direct any settlement area expansions away from prime agricultural land (especially classes 1-3 or the best 3 classes of land within the municipality). It is vital that when municipalities must make decisions about where to accommodate population growth, that the importance of farmland and the viability of existing farm businesses is considered. As can be seen in areas such as the Region of Waterloo, with good planning and clear boundaries, farms and urban populations can be mutually beneficial neighbours.

Land use planning is a vital process for protecting the integrity of key resources, natural and cultural, for the benefit of all Ontarians. Protecting our limited farmland as farmland in the long-term benefits farmers, now and into the future. It also benefits all Ontarians to have this valuable resource of food-producing land protected and at easy access to the eating population. Protection of our dependable productive farmland is vital across the province, but especially in the Greater Golden Horseshoe (GGH) region where growth pressure is so significant.

Intensification and Density Targets

The "Application of Intensification and Density Targets" ensures that municipalities set intensity targets for existing settled areas, new settlement area expansions and especially around transit stations. While these targets make for more efficient access to infrastructure, such as public transportation, it also encourages better use of existing settled areas and curbs sprawl. These targets will also help to protect farmland and slow the rate of sprawl into designated greenfields and ultimately further into rural areas.

Summary

The proposed guidance documents have included appropriate consideration of the impact of development on our high-quality productive farmland within this fast-growing region. Living in smaller housing units closer together is a cultural shift for many Canadians. It is important that the provincial approval as part of the Municipal Comprehensive Review process ensures that these policies are properly enforced and that our productive farmland is protected within this region.

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We appreciate this opportunity to respond to these proposed guidance documents and thank you for your consideration of our comments.

Sincerely,

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

Clarence Nywening, President
Christian Farmers Federation of Ontario
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