



## COMMITTEE REPORT

**To:** Chair and Members of the Planning Committee  
**From:** Mark Paoli, Manager of Policy Planning  
**Date:** September 6, 2017  
**Subject:** **PROVINCIAL GROWTH PLAN – COMMENTS ON DRAFT AGRICULTURAL SYSTEM**

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### 1.0 Background:

As discussed in our Planning Report titled “Provincial Plan Updates” in May 2017, the Province released updates to the Growth Plan for the Greater Golden Horseshoe (the Growth Plan) and the Greenbelt Plan on May 18, 2017. The updated Growth Plan includes policy direction for two new systems across the Greater Golden Horseshoe: an Agricultural System and a Natural Heritage System. The mapping and methods for these systems were not available when the Plans were released.

Earlier this summer, the Province released draft mapping and supporting documents for the Agricultural System through the Environmental Bill of Rights Registry (see Attachment ‘A’) with an October 4, 2017 comment deadline.

This report sets out the County’s comments and member municipalities are welcome to use this report as a basis for their comments if they wish to do so.

### 2.0 Draft Greater Golden Horseshoe Agricultural System

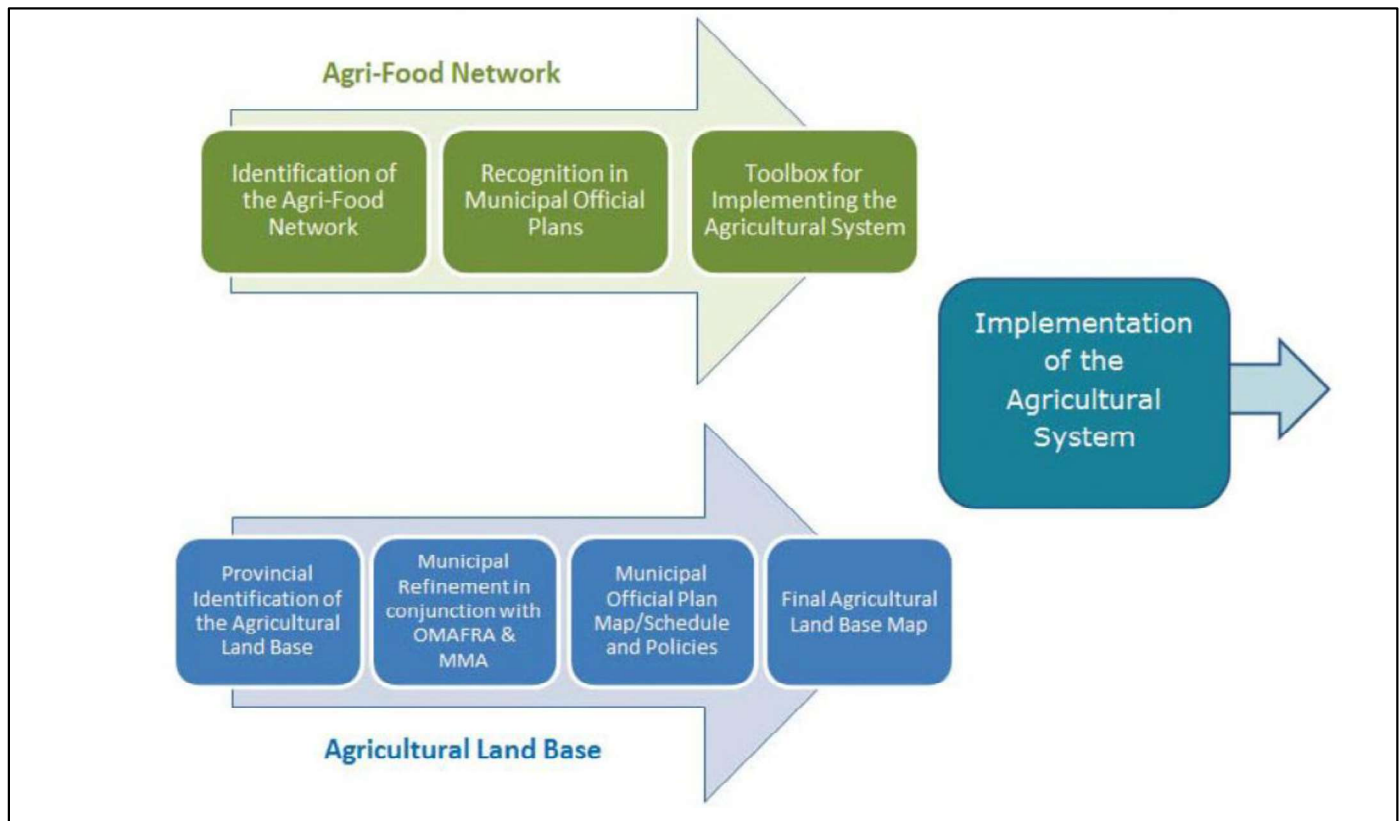
The Agricultural System is defined in the Growth Plan as:

“The system mapped and issued by the Province in accordance with this Plan, comprised of 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;
2. An *agri-food network* which includes *infrastructure*, services, and assets important to the viability of the agri-food sector.”

The Province has identified a process to implement the system as shown in Figure 1 below:

**Figure 1: Steps to Implement an Agricultural System in the Greater Golden Horseshoe**  
(source: OMAFRA Draft Implementation Procedures document, 2017)



The posting on the Environmental Bill of Rights relates to the “Provincial Identification of the Agricultural Land Base” step in the bottom left of the above figure. The Province invited comments on three products that have been released in Draft form:

- Agricultural System Web Portal;
- Agricultural Land Base Map; and
- Implementation Procedures Document

## **2.1 Agricultural System Web Portal**

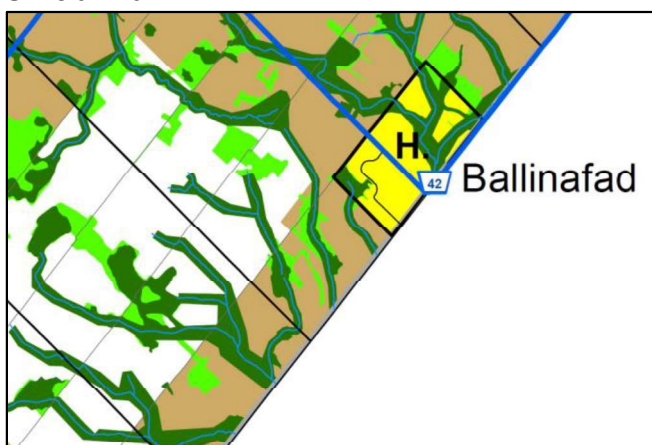
The Agricultural System Web Portal is intended to be a place where the public, planners, economic developers and decision-makers can find relevant information about agricultural resources and the agri-food network across the Greater Golden Horseshoe region.

## Comments:

1. We support the initiative to have a region-wide source of information about agricultural resources and the agri-food sector;
2. We have significant concerns about errors on the map layer titled “Areas currently designated Agricultural”, which is intended to show the Prime Agricultural Area designation in the County Official Plan, because it incorrectly includes:
  - a. All of the lands designated “Secondary Agricultural Area” in Minto and Erin;

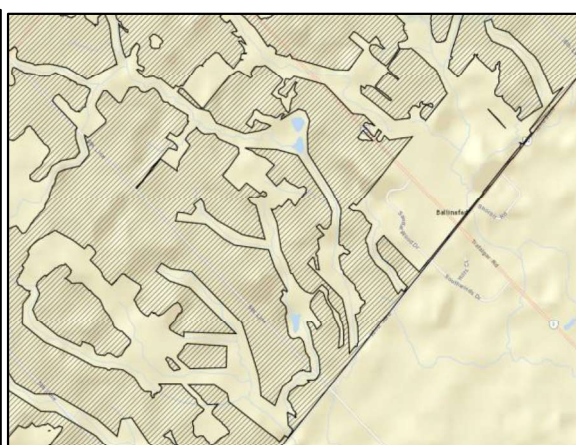
**Figure 2: Example of Secondary Agricultural Area shown as Prime Agricultural Area**  
(hatching on web portal map on right intended to show Official Plan Prime Agricultural Areas)

**Official Plan**



□ Prime Agricultural  
■ Secondary Agricultural

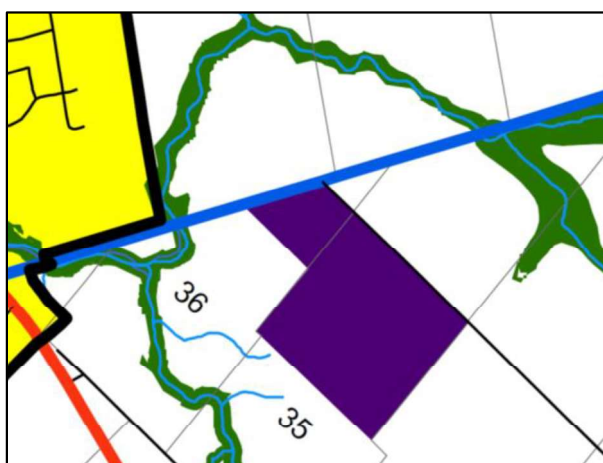
**OMAFRA Web Portal**



- b. All of the lands designated “Rural Employment Area” in the County;

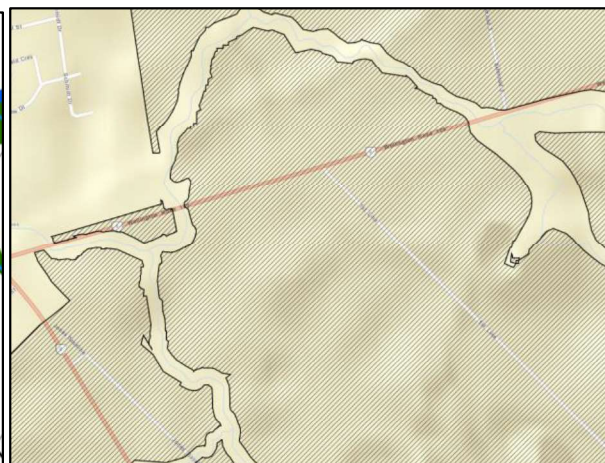
**Figure 3: Example of Rural Employment Area shown as Prime Agricultural Area**  
(hatching on web portal map on right intended to show Official Plan Prime Agricultural Areas)

**Official Plan**



■ Rural Employment Area

**OMAFRA Web Portal**

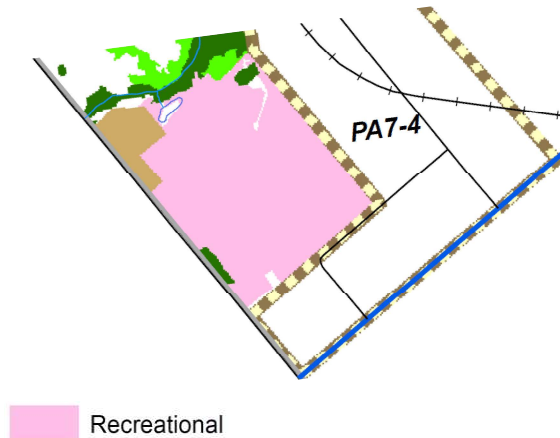


- c. Most of the lands designated “Recreational” including most of the existing golf courses;

**Figure 4: Example of Recreational Area shown as Prime Agricultural Area**

(hatching on web portal map on right intended to show Official Plan Prime Agricultural Areas)

**Official Plan**



**OMAFRA Web Portal**



We request that this layer in the web portal be revised to correctly show the extent of lands designated ‘Prime Agricultural Area’ in the County Official Plan.

3. In terms of the layers that show agri-food businesses, we note that there are a number of gaps in the information for Wellington County. Grain elevators, a brewery and a winery are examples of businesses in Wellington County that are not shown. We would be willing to provide the Province with the agri-food business data that the County maintains so that the Province can add it to the web portal.

## 2.2 Agricultural Land Base Map

The Agricultural Land Base Map is intended to establish a consistent, region-wide ‘Prime Agricultural Area’ designation. The methods used to create the map involved analysis and interpretation of Official Plan designations, soil capability for agriculture mapping, farm production data and land fragmentation. In Wellington County, the map shows ‘Prime Agricultural Areas’ and ‘Candidate Areas for the Agricultural Land Base’.



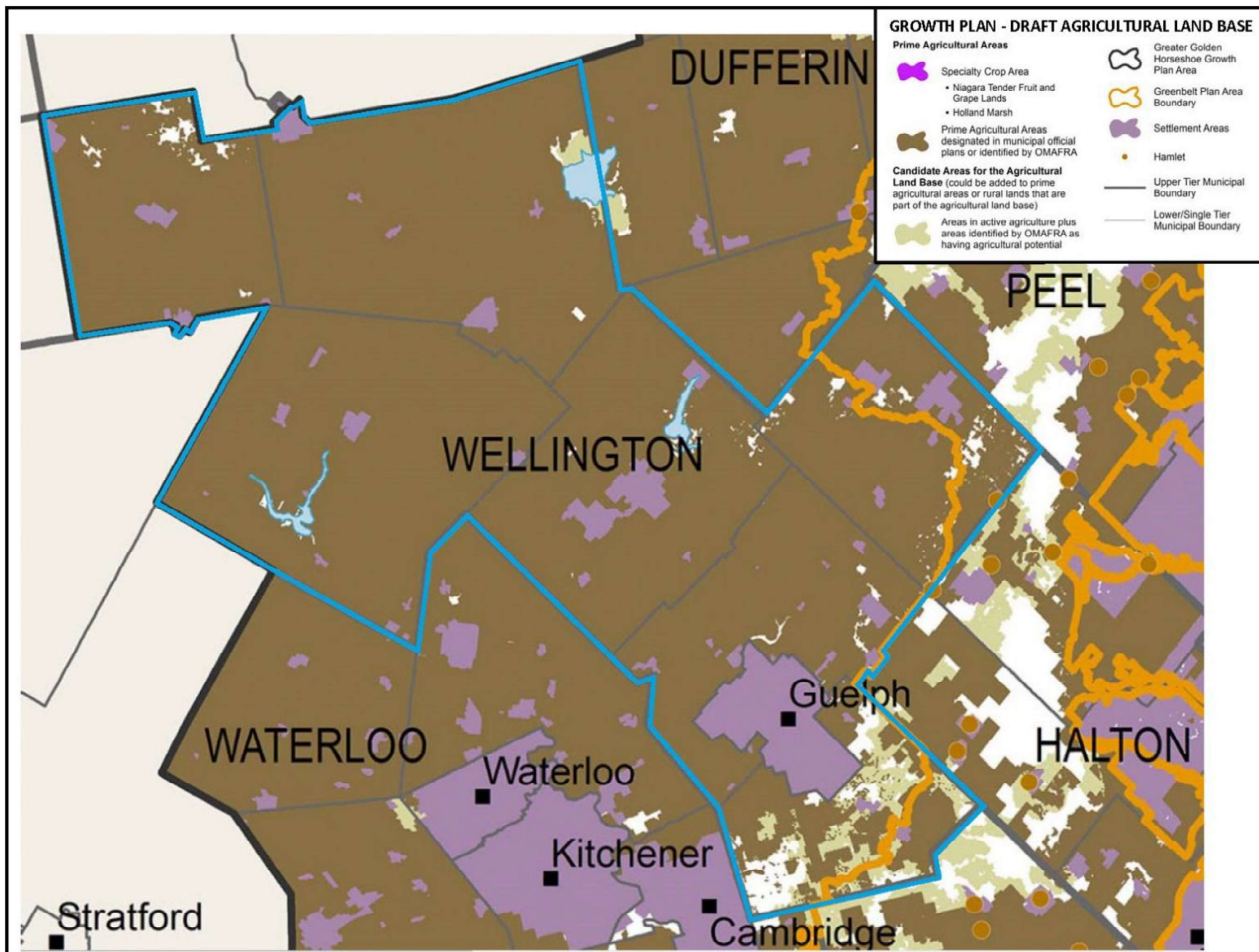


Figure 5: Excerpt of Draft Agricultural Land Base Map to enlarge Wellington County and surrounding area



## **Prime Agricultural Areas (dark brown on Figure 5)**

On lands where the Province's Prime Agricultural Area differs from the County Official Plan, the Official Plan will have to be amended through a municipal comprehensive review. Once this process is complete across the region, the Province's objective is for Prime Agricultural Areas to match where they cross the boundaries between the County and its upper-tier municipal neighbours.

## **Candidate Areas (beige on Figure 5)**

Candidate Areas are areas that the Province has identified as areas in active agriculture or having agricultural potential. According to the Draft Implementation Procedures, "municipalities may wish to undertake further analysis and consult on candidate lands during municipal comprehensive review prior to classifying these lands. OMAFRA will provide advice and data to aid in municipal decision-making and municipalities will document the rationale for including or not including these areas within the agricultural land base." As a result, some flexibility in dealing with the Candidate Areas is expected.

Our comments on the Draft Agricultural Land Base Map are set out below. We note that our ability to review the Draft Land Base Map was limited by the fact that the Province refused to share the Geographic Information System (GIS) data. As such, our review relied on the web portal discussed above and visual comparisons of map images:

### **Comments:**

1. We do not support the Province's refusal to share GIS data in this EBR commenting process.
2. The Draft Land Use Map would:
  - a. Redesignate all lands designated in the County Official Plan from 'Secondary Agricultural Area' to 'Prime Agricultural Area' in Minto and Erin.
  - b. Redesignate all lands designated in the County Official Plan from 'Rural Employment Area' to 'Prime Agricultural Area';
  - c. Redesignate most of the lands designated in the County Official Plan from 'Recreational' to 'Prime Agricultural Area';
  - d. Redesignate some of the lands designated in the County Official Plan from 'Secondary Agricultural Area' to 'Prime Agricultural Area' in Puslinch; and
  - e. Require us to consider redesignating the provincially identified Candidate Areas in Puslinch from 'Secondary Agricultural Area' to 'Prime Agricultural Area'.

We recently met with Ministry staff about some of the above points. In terms of items a. through c., it appears that these may have resulted from the same errors that we noted in the previous section about the web portal. We have just begun a process of exchanging information with the Province to address the errors. As a result, we are not in a position to complete our comments on the Agricultural Land Base Map at this time and request an extension to the commenting deadline until the County has had an opportunity to review and comment on a revised product.

3. In terms of the mapping method, we support the approach whereby lands that are designated in the County Official Plan as: 'Prime Agricultural Area'; 'Urban Centre'; 'Hamlet'; and 'Country Residential' were not redesignated on the Draft Agricultural Land Base Map.

## 2.3 Implementation Procedures

According to the Draft 'Implementation Procedures for the Agricultural System in Ontario's Greater Golden Horseshoe', the document is intended to "help municipalities, decision-makers, farmers and others interpret and implement the Agricultural System references and policies in the land use plans for the Greater Golden Horseshoe...".

### Comments:

1. We support the economic development approaches outlined in the document and note that a number of these are in place or are under development at the County and/or member municipalities and we would be happy to share examples with the Ministry;
2. Section 3.1.1.1 is about municipal refinement of Prime Agricultural Areas that would occur through the municipal comprehensive review. This section states that minor refinements may be considered for certain situations including:

"Recognition of **large** areas of existing, permitted non-agricultural land uses that could not be rehabilitated to agriculture (e.g. developed industrial park, aggregate extraction below the water table)."

The section goes on to state that municipal refinements should not be considered for a number of situations including:

"Exclusion of **small** pockets of land in non-agricultural uses (e.g. severed lots, small commercial or industrial uses)".

We have concerns with the approach to existing designated areas of non-agricultural land uses. Based on our reading, it appears that small areas of non-agricultural land use designation (such as Rural Employment Area, Recreation Area, Lifestyle Communities, or other Site-Specific Areas) will be automatically changed to a Prime Agricultural Areas designation through this process and there would be no ability for the County to retain the current designation. If such areas are still included in the agricultural land base at the time of the municipal comprehensive review, then municipalities should have the option to remove them from the agricultural land base, regardless of their size or built up status.

### 3.0 Comment Summary:

We have just begun a process of exchanging information with the Province to address errors in the interpretation of the County Official Plan mapping that was used to establish the draft Agricultural Land Base Map. Accordingly, we are not in a position to complete our comments on the Agricultural Land Base Map at this time. Wellington County requests an extension to the commenting deadline until we have had an opportunity to review and comment on a revised product.

Our other comments on the Agricultural System are summarized below:

Comments on the Web Portal	Comments on the Agricultural Land Base	Comments on the Implementation Procedures
<ol style="list-style-type: none"> <li>1. We support the initiative to have a region-wide source of information about agricultural resources and the agri-food sector;</li> <li>2. We have significant concerns about errors on the map layer titled "Areas currently designated Agricultural", which is intended to show the Prime Agricultural Area designation in the County Official Plan.</li> <li>3. In terms of the layers that show agri-food businesses, we note that there are a number of gaps in the information for Wellington County. We would be willing to provide the Province with the agri-food business data that the County maintains so that the Province can add it to the web portal.</li> </ol>	<ol style="list-style-type: none"> <li>1. We do not support the Province's refusal to share the GIS data under this EBR commenting process.</li> <li>2. In terms of the mapping method, we support the approach whereby lands that are designated in the County Official Plan as: 'Prime Agricultural Area'; 'Urban Centre'; 'Hamlet'; or 'Country Residential' were not changed on the Draft Agricultural Land Base Map.</li> </ol>	<ol style="list-style-type: none"> <li>1. We support the economic development approaches outlined in the document and note that a number of these are in place or are under development at the County and/or member municipalities and we would be happy to share examples with the Ministry.</li> <li>2. We have concerns with the approach to existing designated areas of non-agricultural land uses. Based on our reading, it appears that small areas of non-agricultural land use designation (such as Rural Employment Area, Recreation Area, Lifestyle Communities, or other Site-Specific Areas) will be automatically changed to a Prime Agricultural Areas designation through this process and there would be no ability for the County to retain the current designation. If such areas are still included in the agricultural land base at the time of the municipal comprehensive review, then municipalities should have the option to remove them from the agricultural land base, regardless of their size or built up status.</li> </ol>



#### **4.0 Recommendation:**

That the report “Provincial Growth Plan – Comments on Draft Agricultural System” be forwarded to the Ministry of Agriculture and Food and Rural Affairs and the Ministry of Municipal Affairs and be circulated to member municipalities in Wellington County.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Paoli".

Mark Paoli  
Manager of Policy Planning

## **ATTACHMENT 'A'**

### **ENVIRONMENTAL BILL OF RIGHTS POSTING**



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### Policy Proposal Notice:

**Title:**

Release of draft Agricultural System mapping and Implementation Procedures for consultation

**Keyword(s):** [Agriculture](#) | [Land](#) | [Land use planning](#) | [Conservation](#)

Comment Period: 90 days: submissions may be made between July 06, 2017 and October 04, 2017.

### Description of Policy:

On May 18, 2017, the province released updates to its four land use plans: the Growth Plan for the Greater Golden Horseshoe (GGH), the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Niagara Escarpment Plan. 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.

### Purpose of Policy:

Agriculture and food are central to Ontarians' quality of life and economic prosperity. During the coordinated review of the provincial land use plans, recurring feedback was received about the need to support a vibrant agri-food sector while consistently protecting farmland across the GGH. The advisory panel on the Coordinated Land Use Planning Review, chaired by David Crombie, recommended that the province work with municipalities, the agriculture sector and other stakeholders to provide policy direction and guidance on an Agricultural System across the GGH.

OMAFRA has prepared three products that address the public's and the advisory panel's recommendations. They also support the implementation of the Agricultural System policies in the updated provincial land use plans.

1. Draft Implementation Procedures that will guide municipalities and others on how to implement Agricultural System policies in their communities;
2. A web-based, draft Agricultural System Portal containing extensive mapping that can be used to identify existing agri-food assets and clusters, for economic development purposes. The maps will also inform Agricultural Impact Assessments (i.e. assessment of potential adverse impacts from non-agricultural uses to the Agricultural System and how impacts can be avoided).



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**EBR Registry Number:** 013-0968

**Ministry:**

Ministry of Agriculture, Food and Rural Affairs

**Date Proposal loaded to the Registry:**

July 06, 2017

### Contact:

**All comments on this proposal must be directed to:**

Helma Gerts  
Policy Advisor  
Ministry of Agriculture, Food and Rural Affairs  
Policy Division  
Food Safety and Environmental Policy Branch  
1 Stone Road West  
Floor 2  
Guelph Ontario  
N1G 4Y2  
Phone: (519) 826-6377

**To submit a comment online, click the submit button below:**

[Submit Comment](#) (opens in new window)

### Additional Information:

**The documents linked below are provided for the purposes of enhancing public consultation.**

All links will open in a new window

3. Draft provincial mapping of the agricultural land base, created using consistent criteria. The agricultural land base mapping may be refined by municipalities in accordance with the Agricultural System Implementation Procedures.

1. [Draft Agricultural System Land Base Map](#)
2. [Draft Agricultural System Portal](#)

Comments are welcome on all three products.

#### **Public Consultation:**

This proposal has been posted for a 90 day public review and comment period starting July 06, 2017. If you have any questions, or would like to submit your comments, please do so by October 04, 2017 to the individual listed under "Contact". Additionally, you may submit your comments on-line.

All comments received prior to October 04, 2017 will be considered as part of the decision-making process by the Ministry if they are submitted in writing or electronically using the form provided in this notice and reference EBR Registry number 013-0968.

Please Note: All comments and submissions received will become part of the public record. Comments received as part of the public participation process for this proposal will be considered by the decision maker for this proposal.

Your personal information may be used in the decision making process on this proposal and it may be used to contact you if clarification of your comment is required. It may be shared (along with your comment) with other Ontario Ministries for use in the decision making process. Questions about this collection should be directed to the contact mentioned on the Proposal Notice page.

#### **Other Public Consultation Opportunities:**

Pre-consultation activities helped to shape OMAFRA's draft Agricultural System mapping and Implementation Procedures. This included interviews with experts, a survey of Land Evaluation and Area Review practitioners, on-going input from a multi-stakeholder "sounding-board" group, regional multi-stakeholder technical meetings, and discussions with stakeholder organizations.

Additional consultation with stakeholders will occur during the Environmental Registry posting period. For details and updates, please visit [OMAFRA's website](#).

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