

Land Use Planning Review  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
Advisory Panel Chair David Crombie  
777 Bay Street  
Suite 425, 4<sup>th</sup> floor  
Toronto M5G 2E5

Minister Ted McMeekin  
Municipal Affairs and Housing  
17<sup>th</sup> floor  
777 Bay Street  
Toronto M5G 2E5

Minister of Natural Resources  
Bill Mauro  
Suite 6630, 6<sup>th</sup> floor  
Whitney Block  
99 Wellington St W  
Toronto M7A 1W3

Advisory Panel:  
Keith Currie  
Rae Horst  
John Mackenzie  
Leith Moore  
Debbie Zimmerman

Dear Ministers McMeekin and Mauro, Mr. Crombie and Review Advisors:

Thank you for the invitation to participate in the Co-ordinated Land Use Review of the Greenbelt, Niagara Escarpment, Oak Ridges Moraine and Greater Golden Horseshoe Growth plans. Our group, the North Dufferin Agricultural and Community Taskforce (NDACT), believes these vital provincial plans should be strengthened and expanded, so that Ontario's best farmland and water resources are better protected for our economic and food security. NDACT has recent experience in campaigning for farmland and water resource preservation. From 2009 to 2012, we led a large and successful citizens' movement that stopped the Highland Mega Quarry - the largest proposed quarry in Canadian history - on 6,500-acres of Class 1 soil at the headwaters of five river systems abutting the Greenbelt.

The campaign engaged thousands of rural and urban residents, and highlighted the need to protect critical agricultural land and water resources inside and outside the provincial plans. It also gave birth to the Food & Water First movement that continues to press for land-use revisions. NDACT and Food & Water First believe the Co-ordinated Land Use Review is an opportunity to bolster existing protections within these plans and extend them beyond their boundaries. In this, the United Nations International Year of Soils, the Ontario government can lead the country by protecting its farmland and water resources in a bold initiative that would benefit future generations.

We are impressed with the statement in the Discussion Document for the 2015 Co-ordinated Review referring to the unique natural resources of southern Ontario:

....2

***“It has some of Canada’s most important and productive farmland. Its fertile soil, moderate climate and abundant water resources support agricultural production that cannot be duplicated elsewhere in the province or country.”***

Thanks to our soil, water and climate conditions, Ontario is home to the largest agri-food sector in the country. It employs 740,000 people and contributes \$34-billion to the economy each year. Our fields and orchards not only feed Ontarians, they help feed other parts of the world, as well.

Nearly one-half of Ontario’s fruit farms and one-fifth of its vegetable farms are within the Greenbelt. They must continue to thrive and grow. The drought plaguing California - the largest food producer in the U-S - is a stark reminder that Ontario’s role in feeding itself and other markets is becoming more important. We can no longer rely on cheap produce from California. We must build a resilient agri-food economy as climate change takes its toll. Therefore, NDACT supports tighter protections for agricultural lands within all four provincial plans.

NDACT also recommends:

- The four plans need to be brought into alignment with a common language used throughout to enhance the protection of Ontario’s prime farmland and source waters.
- The four plans should include consideration for the protection of lands and source-water that are downstream, though not within the policy areas, but areas also vulnerable to pollution activities carried out upstream.
- The following policies and legislation should be aligned with the four plans to further enhance the protection of prime farmland and source waters: Local Food Act 2013; The Big Move 2008; Building Together: Guide for Municipal Asset Management Plans 2012; Make No Little Plans: Ontario’s Public Sector Strategic Plan 2013; Natural Heritage Reference Manual 2010; Lake Simcoe Protection Plan 2009; Ontario’s Great Lakes Strategy 2012.
- Aggregate extraction should not be allowed on any Class 1 farmland within the provincial plans. The Stop the Mega Quarry campaign triggered a review of the Aggregate Resources Act by the Standing Committee on General Government. The provincial government responded to the Committee’s report: ***“On the matter of aggregate extraction on prime agricultural lands, the government believes that there may be a need to go beyond the Committee’s recommendation to address concerns expressed by some of***

....3

***our agricultural stakeholders and through various public interest groups, about the need to better protect farmland.”***

- Where aggregate operations are approved, there should be a ban on extraction below the water table. The proposed Highland Mega Quarry would have plunged 200 feet below the water table, devastating a massive aquifer and impacting water for up to one million people downstream. As well, Highland intended to pump 600-million litres of water a day in perpetuity in order to keep the open pit mine dry enough for extraction. That’s the same amount of water used by 2.7 million Ontarians each day.

While ensuring farmland and water resources within the provincial plans are protected from non-farming development, NDACT also believes this review should go further. A mere 0.5 percent of Canada is comprised of Class 1 soil. Just over half of this soil is in southern Ontario, and we’ve already destroyed nearly 20 percent of it. Had the Highland Mega Quarry been approved, 2,300-acres of Class 1 farmland adjacent to the Greenbelt would have been excavated for an open-pit mine. Therefore, NDACT requests the four provincial plans be expanded and include:

**A 10-year moratorium on all new rezoning applications impacting non-farming development on Class 1 farmland wherever it exists in Ontario.**

We are not alone in recommending a wider, inspiring vision for the province’s prime agricultural lands, the only soils capable of growing our food. Others share our view.

The Ontario Federation of Agriculture made a similar request to the provincial government in 2014, asking that Classes 1, 2, 3 and 4 be protected. The Loblaw chair in Sustainable Food Production at the University of Guelph, Ralph Martin, says there should be no development allowed on any Class 1 and 2 farmland. He suggests “green dots” where the rarest soil in the province is automatically off-limits to anything but food production. NDACT agrees with this concept. Once this rare soil is paved over or mined, it is gone forever. Under protection and careful stewardship, Ontario’s agricultural lands can produce healthy, local food in perpetuity and continue to contribute billions to our economy.

There is also evidence from the Neptis Foundation and other land-use researchers that makes a powerful argument in favour of a robust policy for farmland protection outside the four provincial plans. According to the Neptis Foundation:

....4

**“The research shows that of the designated urban land in the GTHA, only 5,200 hectares (9 percent) of the 56,200 hectares of designated land supply in the Inner Ring have been urbanized. Enough land remains in the current supply to last to 2031 and likely beyond.”**

As well, the Frontier Centre for Public Policy has found intensification has eased the pressure on greenfield land in the GTHA and GGH. It states there are about 800,000 housing units in the current supply, far exceeding what is needed to accommodate the forecast population growth to the year 2031. It goes even further: **“A strong argument can be made that we do not need any more greenfield land to accommodate the new Growth Plan forecasts which takes us out to the year 2041.”** If more people are living on less land, let’s protect more of the farmland critical to our food supply and economic well-being.

One year ago, during the provincial election campaign, the Ontario government indicated the issue of preserving farmland outside the four provincial plans was on its agenda. Premier Kathleen Wynne promised to introduce a *Farms Forever* program, one that would protect more prime farmland close to urban centres. It appears *Farms Forever* would be similar to a 27-year-old program in Pennsylvania. That state – our Great Lakes neighbour and competitor -- has the largest farmland preservation program in the U-S and has protected more than 500,000-acres of prime farmland for its \$68-billion agri-food sector.

Details of *Farms Forever* have not been released, but NDACT believes this program should be part of an expansion of the existing provincial plans. According to the Ontario Federation of Agriculture, we are losing up to 350-acres of farmland a day to non-farming activities. This is unsustainable in a province with the largest agri-food sector in the country and more than 700,000 jobs at stake.

NDACT also notes the four provincial plans do not have policies addressing climate change. The withered fields and orchards in California, along with mandatory water rationing should be a wake-up call for Ontario. Healthy soil acts as a carbon sink and can help mitigate the impacts of climate change. In 2012, the David Suzuki Foundation released a report “Carbon in the Bank” which details the benefits of the Greenbelt in storing carbon:

**Forests:** 40 million tonnes of carbon. Value \$2.09 billion or \$167.9 million per year over 20 years.

**Wetlands:** 6.7 million tonnes of carbon. Value: \$348.4 million or \$41.8 million per year over 20 years.

...5

**Agricultural soils:** 39.9 million tonnes of carbon. Value: \$2.08 billion or \$157 million per year over 20 years.

**Total:** 86.6 million tonnes of carbon. Total value: \$4.5 billion or more than \$366 million per year over 20 years.

If this much carbon is being stored within the Greenbelt, imagine the potential to mitigate climate change by protecting more agricultural soils, forests and wetlands *outside* its borders.

Previous governments were wise to create the four provincial plans, protecting farmland, forests and water. However, aggregate continues to trump agriculture within the plans and outside their boundaries. Developers are eager to slice into the protected regions despite compelling evidence that shows existing farmland outside the plans need not be destroyed for more urban sprawl, let alone within the plans. As well, climate change is ravaging agricultural regions in the US, putting pressure on our cheap supply of imported produce.

Earlier this year, researchers at McMaster University published a report “Dollars and Sense: Opportunities to Strengthen Ontario’s Food System.” It revealed that more than half of Ontario’s \$20-billion in imported food products could be grown here. The report states if we replaced the top 10 imported fruits and vegetables by growing them locally, 3,400 jobs would be created and another \$250-million would be added to the economy. Of course, local food requires local farmland. If we are to grow more of our own fruits and vegetables, we must ensure there is enough suitable farmland to do so.

In summary, NDACT and Food & Water First believe there is a tremendous opportunity for the province to implement co-ordinated, sweeping and visionary land-use policies that will ensure a positive legacy for Ontario. We are fortunate to have the best soil and climate conditions in the country. These natural gifts have helped grow the largest agri-food sector in Canada, feeding millions of people here and elsewhere. We must not squander these gifts. We strongly urge you to tighten the protections for the vital farmland, forests and water resources within the Greenbelt, Niagara Escarpment, Oak Ridges Moraine and Greater Golden Horseshoe Plans. Rare farmland – unique to the country and world – should be protected in perpetuity, not threatened or destroyed in perpetuity.

...6

We also strongly recommend the four provincial plans be expanded to include far more of Ontario's prime agricultural soils and water resources. A 10-year moratorium on rezoning applications impacting non-farming development on all Class 1 farmland in Ontario would be a start. Ten years should be enough time to ensure the remaining parcels of this irreplaceable soil are preserved with clear and effective land-use policies developed after careful consultation.

NDACT and Food & Water First believe it is our duty as Ontario citizens to speak up for the future of our province and help create a legacy we can all take pride in. Thank you for considering our submission.

Yours sincerely, and on behalf of the board of NDACT,

Shirley Boxem – Chair

[www.ndact.com](http://www.ndact.com)

[www.foodandwaterfirst.com](http://www.foodandwaterfirst.com)

The following organizations have reviewed and endorse this submission:

Local businesses and partners:

Southbrook Vineyards <http://www.southbrook.com/> Paul DeCampo

Sophie's Skin Care <http://www.sophiesskincare.com/> Sophia Lavimodiere

Roy's Service Centre <http://www.rsautomotive.com/> Roy Hinbest

Rawhide Adventures <http://www.rawhide-adventures.on.ca/RHA/> Carl Cosack

Municipal and Land use organizations:

AWARE Simcoe <http://aware-simcoe.ca/> Don Morgan

Midhurst Ratepayers' Association <http://www.friendsofmidhurst.ca/> Margaret Prophet

Ontario Rivers Alliance <http://www.ontarioriversalliance.ca/> Linda Heron

Chatsworth Taxpayers For A Safe And Healthy Environment Anita Kurita

Springwater Park Citizens' Coalition

<https://springwaterparkcitizenscoalition.wordpress.com/> Les Stewart

CRAND <http://www.crand.org/> Temara Brown

CORE Conserve Our Rural Environment <http://corecares.ca/> Rob Green

Mulmur Township – <http://mulmurtownship.ca/> Tracey Atkinson, Town Planner

County of Dufferin <http://www.dufferincounty.ca/> Michelle Dunne, Deputy Clerk

David Suzuki Foundation <http://www.davidsuzuki.org/> Faisal Moola