To: Mayor Laura Ryan & Town Council  
From: David Trotman - Director Planning  
Date: April 30th, 2018  
Subject: Provincial Agricultural System

A significant policy initiative stemming from the Provincial Coordinated Plans Review (2017) by Ministry of Municipal Affairs & Housing (MMAH) was the announcement of a new Agricultural System and to be implemented by municipalities across the Greater Golden Horseshoe (GGH).

The first Greenbelt Plan (2005) introduced the concept of an Agricultural System as part of the Protected Countryside Area but limited its reference to associated Provincial Policy Statement (PPS) provisions (Section 2.3). As part of the Coordinated Plans Review (i.e. Growth, Greenbelt, Oak Ridges Moraine and Niagara Escarpment) David Crombie's Advisory Panel prepared numerous recommendations to amend, improve and integrate these Plans; specifically, Recommendation #28 states:

"Building on the Agricultural System approach in the current Greenbelt Plan (2005) work with municipalities, the agriculture sector and other stakeholders to provide policy direction and guidance towards the consistent identification, mapping and protection of an integrated agricultural system across the GGH"

OMAFRA New Agricultural System

A primary objective from the Coordinated Plans Review is the integration of agricultural policies across all four Provincial Plans. The Agricultural System has a key aim of applying a continuous agricultural land base across municipalities within the GGH. To further augment this policy framework, Ontario Ministry of Agriculture & Rural Affairs (OMAFRA) unveiled on February 09th 2018, their new Agricultural System for the GGH.

More importantly, as of this date (February 09th) all lands now captured by the Agricultural System are to reflect OMAFRA's Land Base Mapping that (now) prevails over any conflicting and subordinate local policy, where it applies. All land use planning decisions must also adhere accordingly.

OMAFRA’s Agricultural Land Base Mapping is reflected on the attached Map A. It illustrates both the existing Prime Agricultural land designations presently shown in the Town’s Official Plan - Schedule ‘A’ comparatively with the newly released Agricultural System Land Base Mapping.

The Agricultural System is comprised of two components:

1. Agricultural Land Base Mapping: Consisting of Prime Agricultural Areas, including
Speciality Crop Areas and Rural lands that together create a continuous productive land base. This mapping is to be refined when municipalities update their official plans.

2. **Agri-Food Network**: Includes regional infrastructure and transportation networks, on-farm buildings and infrastructure, agricultural services, farm markets, distributors and primary processing and agricultural supportive communities that are important or vital to a sustainable Agri-Food sector.

**Town of Mono Comments to OMAFRA EBR Post 013-0968 + OMNRF EBR Post 013-1014:**

The Chairman of the Town’s Natural Heritage Steering Committee (NHSC) on behalf of the Town, submitted written comments (September 24th, 2017) to OMAFRA and OMNRF respectively in response to the Province’s request for both EBR Postings. As well, the Director of Planning and NHSC Chairman attended Provincial workshops in Peterborough and Guelph respectively: to meet Provincial staff, get a sense of the scope of both proposed Provincial Agricultural and Natural Heritage Systems and particularly to impress upon OMNRF to directly incorporate the Town's detailed Official Plan Amendment Natural Heritage System (OPA 41) as an integral and meaningful component of the Provincial NHS System.

Although OMAFRA provided an on-line webinar prior to release of their Agricultural System, no municipal technical meetings were delivered by OMAFRA prior to, or at time of their Agricultural System Notice of Release announcement. The Golden Horseshoe Food & Farming Alliance and Friends of the Greenbelt Foundation hosted a technical workshop on the Agricultural System, held May 02nd in East Gwillimbury; and the Director of Planning attended.

**OMAFRA Rationale - Agricultural System**

Desired outcomes of the new Agricultural System approach as envisioned by OMAFRA includes:

1. Long-term strategic integration between the agriculture industry and allied rural economic development business activity on reliable mapping and the OMAFRA web portal data;
2. Improved viability of the agriculture industry through enhanced horizontal and vertical integration of Agri-Food and allied business opportunities;
3. Enhanced long term protection of a broader Southern Ontario agricultural land resource;
4. Increased land use planning consistency and certainty across municipalities;
5. Enhanced integration of Provincial agricultural policy framework with the natural heritage and water-based systems; and,
6. Collaboration between the Province, municipalities, farm operations through strengthened agri-food sectors enhanced by market driven competitive advantages.

**OMAFRA - Agricultural System Implementation Procedures:**

Implementation of the Agricultural System policy framework, as with many other Provincial policy initiatives that have been announced in the past year or more, are to be incorporated into upper tier municipal official plans as a first key step but also through other integrated measures such as local official plans, bylaws and guidelines. The official plan, is arguably, the most important
strategic lead document for ensuring a long-term commitment towards implementing Provincial policy mandates. Updates to lower tier municipal official plans ideally follow similar updates to the upper tier plan where they exist. For Town of Mono, this will follow the Dufferin County (MCR) exercise that is to commence during the second quarter of 2018 and for which all lower tier municipal planning departments will be kept involved.

**Dufferin County Municipal Comprehensive Review (MCR)**

Dufferin County is in the process of undertaking their first Municipal Comprehensive Review, typically referred to as an Official Plan Update. The MCR will comprehensively address numerous policy matters stemming from the Coordinated Plans Review, including the Agricultural System.

Corresponding lower tier municipalities will, in turn, be required to amend their official plans to conform accordingly. Most importantly, *Prime Agricultural Areas* must be identified as directed by OMAFRA Implementation Procedures to comprehensively protect and achieve geographical continuity of the Agricultural Land Base.

**Land Use Mapping:**

*Map A* - OMAFRA Agricultural System shows both Prime Agriculture and Candidate Areas. The former, now in effect, is supported by the integrated (relevant) policy framework of the PPS and Provincial Plans. Candidate Areas will be more closely examined through the Dufferin County MCR and will be further assessed at that time to determine which identified land parcels also become *additional* Prime Agricultural lands or remain with their Rural designation.

*Map B* - overlays the OMAFRA Agricultural System with the Town’s OPA 41 - Natural Heritage System Amendment to the Official Plan. Town staff has on several previous occasions requested that OMNRF advise how OPA 41 will be incorporated into their Provincial Natural Heritage System. This enquiry remains outstanding despite being advised that coordinated Ministry technical comments are pending.

**Land Use Planning Analysis:**

The Growth Plan and the Greenbelt Plan require municipalities to designate “*Prime Agricultural Areas*” including “*Specialty Crop Areas*” in their official plans in alignment with the Provincial Agricultural System and Implementation Procedures.

However, once the Dufferin County Official Plan MCR is substantially complete, Town Planning staff will engage OMAFRA directly for its own Official Plan review to analyze the differences between our existing Official Plan Schedule(s) and the Agricultural Land Base Mapping and confer with OMAFRA to ensure consistency, resolve conflicts and make necessary refinements.

There are several key matters, both general and specific, that ought to be clarified by OMAFRA as part of future municipal discussions for refining their Agricultural System, as follows:

**General Matters**

1. **Differing LEAR Methodologies:**
OPA 37 Land Evaluation Area Review (LEAR) assessed:

a) Class 1 to 3 soils  
b) Lands in agriculture production  
c) Parcel fabric / fragmentation  
d) Farm infrastructure  
e) Conflicting land uses

OPA 37 resulted in lands illustrated on Land Use Schedule ‘A’ in the Town Official Plan shown at time of its approval as “Prime Agricultural.”

OMAFRA’s LEAR for their Agricultural System added Class 4 to 6 soils and assessed:

a) Class 1 to 6 soils (Canada Land Inventory or CLI)  
b) Agricultural land capability  
c) Farm production  
d) Fragmentation

However, CLI mapping remains significantly out of date. As well, the various criteria were weighted, but agricultural lands in production constitute only 30% of the agricultural area score. As was noted in the Town comments, lands in active production provide an excellent litmus test of agricultural viability and sustainability.

Town staff is disappointed that the Mono context and local farming consultations were not directly engaged by OMAFRA before the unveiling their Agricultural System. Consequently, some municipalities may have to conduct a reassessment of their previously approved local LEAR evaluations as part of any OMAFRA refinement exercise.

2. **Overlapping Designations Issues:**

OMAFRA ought to have collaborated with MNRF to produce a single map that reflects both the Agricultural and NHS Systems given the following potential issues:

a) **Prime Agriculture versus Natural Heritage:**

There are several areas now deemed as Prime Agriculture under the OMAFRA Agriculture System that overlap OMNRF Natural Heritage System features. At the time of the Agricultural System announcement, questions arose as to how the Province would reconcile both Systems relative to the Provincial Policy Statement (PPS) that gives priority to agriculture uses over natural heritage sustainability (Section 2.1.9). Based on a preliminary review of the Implementation Procedures for the Agriculture System, there seems to be insufficient technical guidance on how to treat or assess agricultural uses within the NHS where such mapping overlaps occur. For example, expansions to existing agriculture structures is permitted but new structures are prohibited despite circumstances where the result might have the same impact. Without proper clarification from OMAFRA confusion is likely to arise leading to unnecessary enforcement and/or rehabilitation orders.

There doesn’t appear to be any meaningful consideration for balancing new Prime
Agriculture and arable lands, through the Agriculture System, with the benefit of equally broader protection for valuable natural heritage features, particularly now in view of the pending MOECC Watershed Planning System, Greenbelt Plan Expansion and climate change implications generally. What appears to be lost in the balance is that our most valuable prime agriculture lands, owe their viability in part due to the positive effects of adjacent key natural heritage features and hydrologic functions.

b) Prime Agriculture versus NEP:

There appears to be a few areas where the OMAFRA Agriculture System either overlaps or abuts NEP Escarpment Natural Area designations. This designation permits only existing lawfully permitted agriculture uses. Dual designation overlaps such as these is problematic and need to be rectified. Lands presently identified as NEP Escarpment Natural Area need to be removed from all OMAFRA Agriculture System. All other overlaps with remaining NEP designations should provide for the NEP policies to prevail where conflicts arise. Clarification from the NEC perspective has been requested.

c) Prime Agriculture versus Aggregate Extraction Areas:

The OMAFRA Agriculture System overlays at least four existing aggregate sites in Mono (Greenwood / CBM / Mono / AECON). Understandably, these pits will most likely, at some point, be rehabilitated back to agricultural use lands. These conflicting designations might become problematic with respect to permitted uses and certainly where proposed and/or approved aggregate operations would be affected. Clarification from OMNRF would be helpful.

3. Long Term Strategic Initiatives:

The OMAFRA on-line web portal may be an effective tool to identify existing Agri-Food assets and clusters for economic development initiatives. But OMAFRA needs to provide technical and particularly financial assistance to upper tier municipalities for preparation of agricultural and rural economic strategies to ensure effective implementation of their Agri-Food Network so as to demonstrate their support for long-term viability of the Dufferin County agricultural community and the needs to consider the following tools:

a) Food & Farming Assets Analysis
b) Agricultural Competitive Advantages Strategy
c) Agri-Food Network On-line Business Profile
d) Climate Change Mitigation Impacts for Long Term Sustainable Agriculture
e) Regional Implementation Strategy for the Agri-Food Network Component

4. Third Option for Candidate Areas:

Candidate Areas should include a third flexible option where in cases neither a prime agricultural or rural designation is shown to be unsuitable or problematic. Better ministerial coordination might have identified this issue.

5. Policy and Implementation Implications Associated with Mapping Errors

a) How will OMAFRA ensure that GIS / data sets remain up-to-date?
b) Are there data sets for equine and niche crops and other non-traditional crops?
c) How will OMAFRA provide ongoing assistance to municipalities and other organizations using these tools to ensure that they are able to use them effectively?

Specific Matters

1. How and where should the Agriculture System Land Base Mapping be “rounded out” to achieve definable boundaries.

2. OMAFRA Agriculture System Land Base Mapping presently overlays some lands in proximity to three existing hamlet settlements in Mono. Some allowance for measured and moderate growth to these Hamlets, over the long term, needs to be clarified by the Province to provide certainty and sustainability:
   a) Lands north of Brookfield Phase 2 - Island Lake Settlement Area
   b) Lands north of Hockley Valley Hamlet identified as a Candidate Area
   c) Lands north of Camilla Hamlet designated Prime Agriculture

3. Remove Prime Agricultural and Candidate Area designations on specified lands abutting or adjacent to Coles Industrial Park to allow for expanded employment / industrial land supply.

Summary

The Director of Planning recommends that Council approve a resolution, substantially in the following format to instruct the Director of Planning to:

1. Identify any necessary refinement measures to the OMAFRA Agricultural System Land Base Mapping issued February 09th 2018, in conjunction with current Dufferin County Official Plan - Municipal Comprehensive Review process; and,

2. Request OMAFRA to approve, through the Dufferin County Official Plan - Municipal Comprehensive Review process, all identified refinements as requested by Town of Mono staff and/or Council.

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David Trotman
Director of Planning

 Attachments:
 MAP ‘A’  OMAFRA Agricultural System Land Base Mapping Overlay to Schedule A -Town of Mono Official Plan
 MAP ‘B’  OMAFRA Agricultural System Land Base Mapping Overlay to Draft OPA 41 - Natural Heritage Mapping Amendment