



HEALTHY COMMUNITIES • SUSTAINABLE COMMUNITIES

October 1, 2017

Helma Geerts  
Policy Advisor  
Ministry of Agriculture, Food and Rural Affairs  
Policy Division  
Food Safety and Environmental Policy Branch  
1 Stone Road West, Floor 2  
Guelph, ON N1G 4Y2

**Subject: Release of draft Agricultural System mapping and Implementation Procedures for consultation (EBR Posting 013-0968)**

Dear Ms. Gerts,

The Ontario Professional Planners Institute (OPPI) is pleased to provide comments on the draft Agricultural Systems mapping and Implementation Procedures prepared by the Ministry of Agriculture, Food and Rural Affairs (OMAFRA). As a stakeholder in agriculture and agri-food, OPPI would like to thank the Ministry for the opportunity to provide comments on the Agricultural Systems approach that has the goal of supporting the viability of Ontario's agri-food sector and protecting farmland across the Greater Golden Horseshoe area.

OPPI is the recognized voice of the Province's planning profession. Our almost 4,500 members from across Ontario work in government, private practice, universities, and not-for-profit agencies in the fields of urban and rural development, community design, environmental planning, transportation, health, social services, heritage conservation, housing, agriculture, agri-food and economic development. Members meet quality practice requirements and are accountable to OPPI and the public to practice ethically and to abide by a Professional Code of Practice. Only Full Members are authorized by the Ontario Professional Planners Institute Act, 1994, to use the title "Registered Professional Planner" (RPP).

The following are comments for consideration:

-There is support for the Provincial interest of protecting farmland from fragmentation and conversion to non-agricultural uses. In the Agricultural Systems approach, this protection has been broadened to include rural lands that are predominantly comprised of less productive and often marginal agricultural lands. This may have the effect of hindering economic diversification in rural communities of the outer ring areas. The Province should consider the effect of this approach on the economy and culture of these rural areas.

-The mapping has been produced at a small scale which is suitable for covering the entire Greater Golden Horseshoe area but at this scale, can only provide a limited amount of detail. While it is understandable that it would be difficult for the Province to provide more detailed mapping for this large area, there needs to be opportunity for flexibility in the mapping based on local knowledge and ground truthing that better reflects the local conditions (e.g. ensure existing settlement areas, industrial parks are not included in the mapping).

-There are many areas that fall under both the Agricultural Systems and the Natural Heritage Systems mapping and it would be beneficial for review if these systems could be viewed on one map to determine the extent of the overlap. Clarification on how the overlap between systems will be addressed from a policy perspective would be beneficial.

-The Province should consider areas designated Mineral Aggregate Extraction to determine whether or not these should be included in the Agricultural Systems mapping. These areas often include extraction below the water table and the extent to which rehabilitation will return these lands to active agricultural production is unknown.

-The Implementation Procedures document states that a key focus of the Agricultural System approach is agricultural viability. To help support the integration of agricultural viability with the agricultural land base, OMAFRA has mapped elements of the agri-food network. Further direction from the Province on policies and zone provisions to help implement this key focus would be beneficial.

-The section on Access to Farmland could be expanded to provide more direction on the very real issue of the challenges faced by new and young farms that want to enter the agricultural industry.

-OMAFRA is currently in the process of developing Guidelines for Agricultural Impact Assessments (AIA). The implications of requiring an AIA for development on Prime Agricultural lands cannot be fully determined until the details are released. OPPI would like the opportunity to comment on the Guidelines when these are available.

If you have any questions, please contact me at 416-668-8469 or by email at [l.ryan@ontarioplanners.ca](mailto:l.ryan@ontarioplanners.ca)

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Ryan', followed by a horizontal line.

Loretta Ryan, RPP, CAE  
Director, Public Affairs  
Ontario Professional Planners Institute