



YORK REGION
FEDERATION OF AGRICULTURE
SERVING THE FARM COMMUNITY SINCE 1940

October 13, 2021

Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

Attention: Chair Emmerson and Regional Council

Dear Sirs/Madams:

Re: Proposed York Region Official Plan Amendment No. 7
Committee of the Whole October 14, 2021 Agenda Item H.2.1

As you are aware, York Region Federation of Agriculture (YRFA) is a non-profit organization that represents its 650 registered farm business members in York Region on matters that affect their farms as well as decisions that will affect agriculture in the future. YRFA has been monitoring the processing and review of the privately initiated Region Official Plan Amendment (ROPA) No. 7. This letter is specifically related to the most recent staff report concerning this privately initiated amendment (Agenda Item H.2.1).

We concur with and are encouraged by staff's recommendation that Council not adopt York Region Official Plan Amendment No. 7. We are concerned, however, that staff are considering and recommending that the Region introduce a new "Rural/Major Open Space" designation as part of the Municipal Comprehensive Review with policies permitting passive recreation, environmental management, restoration, and enhancement, and urban agricultural uses.

Further, we agree with the concern noted on page 1 of the Summary section of the staff report that, "Approval of ROPA 7 would have implications on the other Greenbelt lands currently recommended through the Region's Municipal Comprehensive Review, for redesignation from Agricultural Area, and potentially similar Greenbelt Lands beyond York Region." We are concerned that similarly, downgrading the Agricultural designation to Rural/Open Space could have the same implications on other Greenbelt lands both within the Region of York and beyond. There is the potential here that by approving the downgrading of the Agricultural Designation, an unfortunate precedent could be set.

BUY THE FOOD ONTARIO GROWS

The ROPA 7 lands are within the Greenbelt Plan, outside of any Settlement Areas. As noted in the staff report (Page 5), the Ontario Municipal Board and the Divisional Court of Ontario have confirmed that urban uses are permitted within the Settlement Area boundary but are not intended within the Greenbelt. As noted on Page 6 of the staff report, the Provincial Greenbelt Plan (2017) identifies where urbanization should not occur to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions.

These policies are important to bear in mind and they form a solid basis for not supporting the proposed ROPA 7. It is concerning, however, that staff are recommending what could be considered a watered-down version of what ROPA 7 is trying to do; which is basically the removal of agricultural lands. We reiterate, the purpose of the Provincial Greenbelt Plan (2017) is to provide permanent protection to the agricultural land base. We recognize that protections also extend to ecological and hydrological features, areas and functions, however, the consideration of redesignating these lands to a new “Rural/Major Open Space” designation loses sight of actually protecting the agricultural land base. The most effective protection for the agricultural land base is for these lands to remain within an “Agricultural Area” designation.

It would appear that the Region is choosing to place a much higher priority on the Greenlands System and at the expense of protecting the Agricultural System. Staff has taken the position that the ROPA 7 lands are not suited for the current Agricultural or Rural designation and have suggested that given the context of the Greenbelt valley corridors now abutting new communities, they are no longer likely to be farmed. This is not the case. Staff also state that current farming on the table land portion of the Greenbelt Fingers is primarily large crop fields that are anticipated to cease operation when the adjacent fields are developed into urban communities. The type of agricultural activities on these tablelands may change, however, this does not mean that these lands could not continue to support agricultural uses such as fruit or vegetable production, orchards or vineyards which in many cases require a much smaller footprint. These lands can and should continue to support agricultural production. The Region should be striving to retain the agricultural designation of the Greenbelt fingers to ensure that access to local food supply is both protected and promoted. Agricultural activities can and should coexist with both ecological and adjacent urban activities. This would represent a balanced approach to growth management, the protection of the ecological system and the protection of the agricultural system.

The Provincial Policy Statement specifically refers to the protection of Prime Agricultural Areas for long-term use for agriculture. We note that the PPS specifically speaks to the designation of prime agricultural areas and retaining such designations to ensure that agricultural activities are sustained. The vision of the Greenbelt Plan is to protect quality agricultural areas, provide flexibility for appropriate farm uses, and strengthen the agricultural system by considering the impacts of development on agricultural areas and planning for local food and near-urban agricultural uses. The proposed down-designation would not reflect any of these objectives.

The staff report states that public use of these lands has been intended to be for passive uses like tree planting, naturalized open spaces, passive trails or **perhaps** (emphasis added) urban agriculture related uses that can be enjoyed by residents. It goes on to state that the proposed Rural/Open Space designation would permit passive recreation uses, ecological restoration and **potentially** (emphasis added) urban area related agricultural or community gardens. These are all very pleasant things, however, consideration also needs to be given to the protection of local food supply and such consideration needs to be beyond a simple “perhaps” or “potentially”. All agriculture is “urban area related” given that, among other things, it provides for the needs of residents through food production.

It is a stated objective in the current York Region Official Plan to protect Agricultural and Holland Marsh Specialty Crop Areas for the future to ensure a sustainable agricultural industry. The York Region Edge Planning Background Report speaks to the importance of farmland not only for the production of food and its direct economic benefits but also its benefits to surrounding urban residents in the form of such things as water filtration, carbon sequestration, pollination, and on-site farmers markets.

We continue to take the position that the proposed ROPA7 application should be denied and that to truly protect for agriculture into the future, the designation of the Greenbelt Fingers should retain the current Agricultural Area” designation.

Yours truly,

Kim Empringham,
Secretary/Treasurer/Director
York Region Federation of Agriculture
12900 Kennedy Road
Stouffville, Ontario
L4A 4A8
york@ofa.on.ca