



# YORK REGION

## FEDERATION OF AGRICULTURE

SERVING THE FARM COMMUNITY SINCE 1940

May 18, 2022

Regional Municipality of York  
Attention: Draft Region Official Plan  
17250 Yonge Street  
Newmarket, Ontario  
L3Y 6Z1

To whom it may concern:

Re: Special Meeting May 19, 2022 for Draft York Region Official Plan

As you are aware, York Region Federation of Agriculture (YRFA) has been monitoring the Municipal Comprehensive Review. We have attached updated detailed comments regarding the Draft Regional Official Plan which include a column containing comments on the May 2022 Draft Regional Official Plan. We appreciate the changes made to the December 2021 Draft Official Plan and offer these further comments on the May 2022 Draft. We will continue to work with the Region to ensure that the agriculture and agri-food industry is appropriately protected.

Yours truly,

Jordan Coates  
President  
York Region Federation of Agriculture  
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1.	Policy	December 1, 2021 Draft ROP Description	Comment on Dec 1 Draft ROP	YR Staff Response	Comment on May 2022 Draft ROP
2.	1.0 Intro pg 5 Key Facts		Add a bullet describing the amount of agricultural land in the Region	Acknowledged – addressed through other content in the Plan	We believe it is important to acknowledge here.
3.	Pg38 3.0	The Natural Environment	There should be a recognition that Ag land is part of the natural environment and contributes to the benefits of the Greenlands System	Acknowledged – addressed through other content in the Plan	Although it is address in other areas of the Plan, we feel it is important to be recognized in this section as part of the natural environment since agricultural land covers 43% of the Region.
4.	3.1.3 & 3.1.6	From Track Changes version 3.1.3 That local official plans shall identify delineate and include policies to establish and protect the Regional Greenlands System and water resource system from development and site alteration. These systems shall incorporate, complement, and build on the systems identified in this Plan, and include policies for the identification and restoration of enhancement areas and linkages, as appropriate. 3.1.6 To restore, enhance and			Our concern is that linkage area boundaries are subjective and in many cases are found on agricultural land. By defining the area, restoring and enhancing linkages this will lead to the further loss of Agricultural land and possible future setbacks from features created. Agricultural land in itself is a linkage area used by many wildlife.



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		maintain linkages and related functions among natural features and areas, surface water features, groundwater features, including key natural heritage features and key hydrologic features.			
5.	3.3 Intro & graphic	The water resource system	Agricultural lands need to be identified as a key component to the water resource system and the hydrological cycle		This was omitted from the Comments Received report. We believe it is important for Agricultural lands to be identified as a key component of the water resource system and hydrological cycle.
6.	3.4.2 Intro pg 56-57	Woodlands	<p>Agricultural production can, in some cases provide more greenhouse gas absorption than woodland.</p> <p>Agricultural land was cleared to provide food production. Agricultural provides many of the same ecological goods and services as woodlands, and in some cases, results in greater long term environmental benefits</p> <p>It should not be the policy of the Region to encourage broad scale tree planting</p>		<p>This comment was also omitted from the Comments Received report. Agricultural production can, in some cases provide more greenhouse gas absorption than woodland.</p> <p>Agricultural land was cleared to provide food production. Agricultural provides many of the same ecological goods and services as woodlands, and in some cases, results in greater long term environmental benefits</p> <p>It should not be the policy of the Region to</p>



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			<p>on Agricultural land, which basically goes against what the Region is saying when it states its intent to protect for agriculture</p> <p>Both Woodlands and Agriculture have environmental benefits and one should not negate the other.</p>		<p>encourage broad scale tree planting on Agricultural land, which basically goes against what the Region is saying when it states its intent to protect for agriculture</p> <p>Both Woodlands and Agriculture have environmental benefits and one should not negate the other.</p>
7.	3.4.2.1&.2 pg 56	<p><b>3.4.2.1</b> To increase woodland cover to a minimum of 25% of the Region's total land area.</p> <p><b>3.4.2.2</b> To increase canopy cover to a minimum of 40% of the Region's total land area.</p>	<p>This should not include broad scale tree planting on agricultural land</p>		<p>This comment was also omitted from the Comments Received report.</p> <p>This should not include broad scale tree planting on agricultural land</p>
8.	5.0 pg 93	<p>The Agricultural System is an important part of the fabric of York Region supporting a vibrant agricultural community and contributing to the economy, quality of life and natural heritage legacy,</p>	<p>We would concur with this statement, however, supporting a vibrant agricultural community requires stronger protections to ensure that the amount of viable agriculture land is not reduced. It would appear that the Region's proposed land use designations and policy framework continues to have the effect of reducing agricultural lands and the viability of the</p>	Acknowledged	<p>Supporting a vibrant agricultural community requires stronger protections to ensure that the amount of viable agriculture land is not reduced. It would appear that the Region's proposed land use designations and policy framework continues to have the effect of reducing agricultural lands and the viability of the agricultural system.</p> <p>The Region should be looking at its overall policies to ensure that</p>



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			<p>agricultural system.</p> <p>The Region should be looking at its overall policies to ensure that stronger protections are in place for all agriculture lands and activities.</p>		<p>stronger protections are in place for all agriculture lands and activities.</p>
9.	5.0 pg 93	With almost half of York Region's land protected for agricultural uses,	<p>It appears that they are including all 3 designations in this calculation. In that case, using the word "protected" would only be applicable to the lands designated Agricultural and Holland Marsh Specialty Crop Areas. The policies for lands designated Rural provide for many other uses and some without even the requirement for an agricultural impact assessment. Rural permits agriculture but does not protect for it. The level of protection is questionable at best.</p>	Acknowledged	<p>The protection of Agricultural Land in the Rural Area should be increased.</p>
10.	5.1.7b.	From Track Changes version b. Submission of an Agricultural Impact Assessment in consultation with the Region addressing the following			<p>The way this it worded it appears that the AIA would only require the items listed in b. It should be reworded to state that the AIA also needs to address the items in b.</p>



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		<p>elements to the satisfaction of the municipality in consultation with the Region:</p> <ul style="list-style-type: none"> <li>i. Proposed use is appropriate in size and scale to the area, including to the existing and/or planned infrastructure;</li> <li>ii. Proposed use shall not adversely affect the ecological integrity of the Regional Greenlands System;</li> <li>iii. Complies with Province's Minimum Distance Separation Formulae;</li> </ul>			
11.	5.1.12.e	<p>From Track Changes Version.</p> <p>e. Existing or new agriculture-related uses, such as farm-related commercial and farm-related industrial uses that are small in scale and directly related to the farm operation and required to be located in close proximity to the farm operation. In these cases, the new lot will be limited to the minimum size required for the use</p>			<p>5.1.12.e. Should be consistent with OMAFRA Publication: Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas. Remove small in scale. Should be directly related to the farm operations in the area instead of directly related to the farm operation.</p>



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		and appropriate individual private on-site water and wastewater systems will be required; or,			
12.	5.1.20.h.	From Track Changes h. Advocating for agri-tourism, on-farm diversified uses and value-added operations; and			5.1.20.h. Add Agriculture-related uses to this list
13.	5.2 pg 98	<b>Objective</b>	<p>Considerations for additional Objectives or policies:</p> <p>Objectives</p> <ul style="list-style-type: none"> <li>- To protect the Prime Agricultural Area for long-term use for agriculture and maintain a continuous agricultural land base, minimizing fragmentation.</li> <li>- To protect agricultural uses in the Prime Agricultural Area from incompatible activities and land uses that would limit agricultural productivity or efficiency.</li> <li>- To provide flexibility to enable agricultural innovation and the adoption of new farming practices and to accommodate the development of agriculture-related</li> </ul>	Addressed in part – policy changes recommended	<p>We appreciate the partial change made, but believe the other suggested objectives are important for the long term viability of agriculture in York Region.</p> <ul style="list-style-type: none"> <li>- To protect the Prime Agricultural Area for long-term use for agriculture and maintain a continuous agricultural land base, minimizing fragmentation.</li> <li>- To protect agricultural uses in the Prime Agricultural Area from incompatible activities and land uses that would limit agricultural productivity or efficiency.</li> <li>- To provide flexibility to enable agricultural innovation and the adoption of new farming practices and to accommodate the development of</li> </ul>



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			uses and on–farm diversified uses in the Prime Agricultural Area. - To support and enhance the Agricultural System by addressing the impacts of development on the System through the planning process and by planning for local food and near-urban agriculture.		agriculture-related uses and on–farm diversified uses in the Prime Agricultural Area. - To support and enhance the Agricultural System by addressing the impacts of development on the System through the planning process and by planning for local food and near-urban agriculture.
14.	Definitions				
15.	Urban Agriculture Definition		Add an Urban Agriculture definition. Two examples are: From Peel: The growing of crops, including nursery, biomass, and horticultural crops, within an urban or rural settlement area. It includes urban farms, community gardens, rooftop gardens and gardens on private lots and may include supporting structures such as hoop-houses, raised beds, and cold-frames to improve production. Urban agriculture may include aquaculture and the raising of	Request Supported - Definition created/updated	This should also include Climate Controlled Agriculture (indoor growing such as vertical farming or raising insects for human or animal consumption)





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			<p>livestock or insects.</p> <p>From Vaughan: The growing or raising of food products produced through agricultural activity within or on the fringe of an Urban Area.</p>		
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