



Farming in Ontario's Greenbelt: Possibility Grows Here

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Possibility grows here.

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Farming in Ontario's Greenbelt: Possibility Grows Here
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Possibility grows here.

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Executive Summary

Since the adoption of the Greenbelt Plan (GBP) in 2005 there have been suggestions that the GBP has compromised the ability of the farm community to farm. The purpose of this study is to understand these sentiments and document the challenges faced by farmers and farm operations located within the Greenbelt.

Through focus groups and interviews held with farmers across the Greenbelt, and surveys and interviews with planners, this study provides a well-rounded documentation of farmers' concerns regarding the viability of their agricultural operations. This study also identifies possible solutions from the perspective of farm operators in the Greenbelt and makes suggestions to address the challenges and barriers identified.

Overall, 10 main issues were identified by Greenbelt farmers—almost all of which are not directly related to the policies of the GBP or are universal and experienced by farmers elsewhere in the province. This is not surprising given the range of provincial and municipal policies and regulations already in place for prime agricultural land throughout the province. Key roadblocks include the multiplicity and layers of regulations, inconsistencies in interpreting provincial policies and regulations across municipalities and conservation authorities, inconsistent objectives between provincial ministries, a general lack of understanding and appreciation for

agriculture, and the cost to farmers associated with meeting the requirements of the various regulations.

Along with their frustrations, many farmers also acknowledged their desire to keep prime agricultural land protected from development and, in turn, that they appreciate the intent of the GBP. Greenbelt farmers identified a number of benefits and opportunities such as being able to proceed with business investments knowing that the land surrounding them will remain undeveloped and that they have the advantage of being in close proximity to the country's largest and most diverse market.

The interviews held with planners unearthed several common themes, the majority of which dealt with a broader scope of topics such as the economics of agriculture, environmental regulations, and availability of municipal services.

This report details the following recommendations:

Administration and Implementation

- Strengthen relationships between the province, municipalities, and stakeholders.
- Provide a stronger voice for agriculture.
- Improve agricultural understanding for planners.
- Build more flexibility into the implementation of the GBP.
- Provide a commitment to public consultation in identifying natural heritage features.



Greenbelt Plan (GBP) Specific

- Create a vision for agriculture within the Greenbelt.
- Apply an agricultural lens to the implementation of GBP policies.

Economic

- Protect farmland by actively supporting farmers.
- Develop a strategy to demonstrate support for local food production.
- Enable value-added farm enterprises.

Environment

- Recognize the environmental goods and services provided by farmers.
- Strengthen Environmental Farm Plan support.
- Provide greater clarity with mapping natural heritage features.
- Create more opportunities for balancing provincial and local interests.

As this report outlines, the challenges and frustrations faced by Greenbelt farmers are important to understand and address, as agriculture is a vital part of our economic, social, and general well-being. In order to maintain a healthy and abundant agricultural landscape in Ontario, it is crucial that we protect the land by protecting and understanding the farmers.

Introduction

This report focuses on the relationship between Ontario's Greenbelt Plan (GBP) and agriculture. The project was initiated in the fall of 2012 and addressed two key objectives:

- i. To identify the actual challenges and barriers faced by individual farm operations and the potential solutions from the perspective of farm operators across the Greenbelt; and,
- ii. To provide specific policy, program, and other recommendations to address the challenges and barriers identified.

The study used a number of methods. First and foremost, farmers across the Greenbelt participated in focus groups and interviews. Planners were also surveyed and interviewed, and they participated with economic development staff in a workshop.

Chapter 2 helps to set the context for this study and Chapters 3 and 4 provide farmer and planner perspectives respectively. Chapter 5 provides reflections on the results and identifies a number of principles moving forward. Chapter 6 provides a number of suggested actions.

1.1 Background

Ontario's GBP (2005) permanently protects more than 1.8 million acres of farmland and environmentally sensitive land in the Greater Golden Horseshoe from urban development.

Agriculture in the Greenbelt is diverse and varied across the Greenbelt's full geography. It includes two specialty crop areas – Niagara's Tender Fruit and Grape Area as well as the Holland Marsh in York Region and Simcoe County. It includes thousands of farmers producing a diversity of crops, ranging from commodities such as corn and soybeans to fruits and vegetables to specialty products. It also includes a range of livestock production including beef, dairy, poultry, and hogs. There are a number of reports that document agriculture within the Greenbelt, including *Greenbelt Grown – A Profile of Agriculture in Ontario's Greenbelt*.

Greenbelt farms, like others in Ontario, are subject to municipal and provincial land use and other policies that establish regulatory controls that impact individual farms. The GBP, however, establishes a somewhat unique regulatory environment that is the subject of this report.

The Golden Horseshoe Food and Farming Action Plan (2012) identified general and specific challenges faced by farmers in and around the Greenbelt. The Friends of the Greenbelt Foundation is interested in developing a more in-depth understanding from the perspective of farmers across the Greenbelt of the key issues affecting their farms' viability – How does the GBP impact agriculture and how is agriculture impacted relative to elsewhere within the province? What are the specific constraints of operating in the near urban areas of the Greenbelt?

1.2 Purpose, Scope, and Approach to Study

Key methods and timing:

- Established an advisory committee that included representation from the Ontario Ministry of Agriculture and Food (OMAF), senior municipal planners, an economic development officer, and the Ontario Federation of Agriculture (OFA).
- Designed and conducted eight focus group discussions (FGDs) with farmers in different parts of the Greenbelt. This included developing an interview guide/protocol, securing participation of farm operators using a contact list provided by the Friends of the Greenbelt Foundation, moderating and recording the sessions. The participants for the focus groups included producers with known challenges associated with the GBP policies. The Foundation identified producers in collaboration with local chapters of the OFA and OFA municipal service representatives as well as regional municipal advisory committees and municipal staff, and secured venues for the FGDs. A total of 32 people participated in these discussions.
- The information gathered through the FGDs was summarized and analyzed in order to identify the issues that required further in-depth examination through semi-structured interviews (SSIs).
- Nine SSIs with producers were conducted. This included developing a list of interviewees based on participants from the focus group sessions, as discussed with the Foundation,

developing an interview structure, setting up, conducting, and recording information collected through the SSIs, and debriefing the Foundation on the most immediate insights.

- A survey was developed for planners working in the Greenbelt. This included municipal and regional planners as well as those working within Conservation Authorities. The questions were developed with input from the Foundation as well as from the Advisory Committee. Analysis of the survey revealed the need to follow up with planners to obtain a more thorough understanding of the issues facing farmers in their jurisdictions. Fifteen planners were interviewed in follow-up to their responses to the survey.
- A preliminary summation of key issues was developed from farmer and planner input, which was presented at a workshop with planners and economic development staff. The purpose of this workshop was to present identified issues, identify gaps, and discuss possible solutions to the identified issues. The feedback provided contributed to the key findings.
- A draft and then final report documenting the findings and making recommendations for the GBP and other policies and programs, and/or their implementation was developed with input from the Foundation and the Advisory Committee.



Agriculture and the Greenbelt Plan

2.1 Greenbelt Plan

The overall vision for the GBP is as follows:

The Greenbelt is a broad band of permanently protected land which:

- *Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use;*
- *Gives permanent protection to the natural heritage and water resource systems that sustain ecological and human health and that form the environmental framework around which major urbanization in south-central Ontario will be organized; and*
- *Provides for a diverse range of economic and social activities associated with rural*

communities, agriculture, tourism, recreation, and resource uses. (GBP, pg. 4)

The GBP came into effect in 2005 and includes the Niagara Escarpment, the Oak Ridges Moraine, and Rouge Park. However, farmlands within the Oak Ridges Moraine area, Niagara Escarpment Plan area, and the Parkway Belt West Plan area are all subject to the requirements established under their respective provincial plans and the Protected Countryside polices of the GBP do not apply. (GBP, pg. 11)

This report focuses on the agricultural lands within the GBP. As such, it does not include a detailed analysis of the policies of the ORMCP or the NEP. It may be, however, that some of the findings of this report have relevance to the practice of agriculture within areas under the jurisdiction of the ORMCP and the NEP.

Figure 1: Map of Greenbelt



The GBP uses a broad designation known as the Protected Countryside. This designation includes four key policy areas:

- an agricultural system;
- natural system;
- parkland, open space and trails; and
- settlement areas.

As is the case with the Provincial Policy Statement and all provincial plans, implementation of the GBP occurs primarily through coordination between upper and lower tiers and amendments to their respective planning documents.

2.1.1 The Agricultural System in the Greenbelt Plan

In order to understand the impact of the GBP on agriculture, it is important to understand what the GBP actually says about agriculture. The following excerpts from the Plan capture the goals of the GBP as they relate to agriculture:

1.2.2 Goals

To enhance our urban and rural areas and overall quality of life by promoting the following matters within the Protected Countryside:

1. Agricultural Protection

- a. Protection of the specialty crop area land base while allowing supportive infrastructure and value added uses necessary for sustainable agricultural uses and activities;*
- b. Support for the Niagara Peninsula specialty crop area as a destination and centre of agriculture focused on the agri-food sector and agri-tourism related to grape and tender fruit production;*
- c. Protection of prime agricultural areas by preventing further fragmentation and loss of the agricultural land base caused by lot creation and the re-designation of prime agricultural areas;*
- d. Provision of the appropriate flexibility to allow for agriculture, agriculture-related and secondary uses, normal farm practices and an evolving agricultural/rural economy; and*
- e. Increasing certainty for the agricultural sector to foster long-term investment in, improvement to, and management of the land. (GBP, pg. 5)*

The rural lands included within the GBP are primarily delineated as the Protected Countryside. In turn, there are three key policy areas within the Protected Countryside including the agricultural system, the natural system, and settlement areas. Specifically, the GBP indicates:

The Agricultural System is comprised of specialty crop areas, prime agricultural areas, and rural areas. While the GBP identifies the boundaries of the specialty crop areas, it relies on municipal official plans to delineate prime agricultural areas and rural areas. (GBP, pg. 7)

The GBP includes specific definitions of each of these terms. The two main agricultural areas (specialty crop and prime agriculture areas) have specific policies that govern land use.

The clear direction for these areas as described within the GBP are that they are intended for long-term and permanent use for agriculture. Specifically, towns, villages, and hamlets are not permitted to expand into these areas and agriculture is the long-term intended use.

Specific details of specialty crop areas are provided below:

3.1.2 Specialty Crop Area Policies

For lands falling within the specialty crop area of the Protected Countryside the following policies shall apply:

- 1. Within specialty crop areas, normal farm practices and a full range of agricultural, agriculture- related and secondary uses are supported and permitted.*
- 2. Lands within specialty crop areas shall not be re-designated in municipal official plans for non-agricultural uses, with the exception of those uses permitted in the general policies of Sections 4.2 to 4.6.*
- 3. Towns/Villages and Hamlets are not permitted to expand into specialty crop areas.*
- 4. New land uses, including the creation of lots, as permitted by the policies of this Plan, and new or expanding livestock facilities shall comply with the minimum distance separation formulae. (GBP, pg. 13)*

Prime agricultural areas, generally defined as Class 1, 2, and 3 soils, are intended for long-term agricultural production. The clear intent is that agriculture has precedence over other land uses in these areas. The specific policies are as follows:

3.1.3 Prime Agricultural Area Policies

For lands falling within the prime agricultural area of the Protected Countryside the following policies shall apply:

- 1. Within prime agricultural areas, as identified in municipal official plans, normal farm practices and a full range of agricultural, agriculture-related and secondary uses are supported and permitted.*
- 2. Prime agricultural areas shall not be re-designated in municipal official plans for*

- non-agricultural uses except for: a) Refinements to the prime agricultural and rural area designations, subject to the criteria identified in the municipal implementation policies of Section 5.2; or b) Settlement area expansions subject to the settlement area policies of Section 3.4.*
3. *Other uses may be permitted subject to the general policies of Sections 4.2 to 4.6.*
 4. *New land uses and the creation of lots, as permitted by the policies of this Plan, and new or expanding livestock facilities shall comply with the minimum distance separation formulae. (GBP, pg. 13)*

Rural Areas comprise the third key component of the agricultural system. These include lands outside settlement areas and outside prime agricultural areas. Rural areas of the protected countryside provide the primary location for a range of recreational, tourism, institutional, and resource-based commercial and industrial uses. They also contain many existing agricultural operations, and agriculture in these areas is encouraged.

Discussing lot creation, or severance policy, is of interest to farmers throughout Ontario. Outside of the Greenbelt, the key documents governing lot creation are the PPS and the local, county/regional official plans. These documents continue to be relevant within the Greenbelt, however, there is an added layer established by the following policies:

4.6 Lot Creation

3. *More specifically, within the specialty crop area and prime agricultural area, lot creation is permitted for:*
 - a. *Agricultural uses where the severed and retained lots are intended for agricultural uses and provided the minimum lot size is 40 acres within specialty crop area and 100 acres within prime agricultural areas;*
 - b. *Existing and new agriculture-related uses, provided that any new lot will be limited to the minimum size needed to accommodate the use, including a sewage and water system appropriate for such a use;*
 - c. *The severance of a residence surplus to a farming operation as a result of a farm consolidation, which residence was an existing use as of the date this Plan came into force, provided that the planning authority ensures that a residential dwelling is not permitted in perpetuity on the retained lot of farmland created by this severance. Approaches to ensuring no new residential dwellings on the retained lot of farmland may be recommended by the Province, or municipal approaches that achieve the same objective should be considered; or*
 - d. *The surplus dwelling policy in 4.6.3 (c) also applies to rural areas as defined by municipal official plans. The severance should be limited to the minimum size needed to accommodate the dwelling, including existing and reserve areas for individual sewage and water services. (GBP, pg. 39)*

As the above makes clear, the range of uses permitted in the GBP is virtually identical to the policies in effect for prime agricultural land in the rest of the province. For example, lot creation is discouraged for non-agricultural uses, while the creation of lots for large farm parcels is permitted, as is the severance of surplus residences as a result of farm consolidation in the Greenbelt as elsewhere. Throughout most of Ontario, severing residential lots for retiring farmers has not been permitted since 2005, as directed by the PPS. Many other municipal jurisdictions did not permit this for decades prior to the 2005 PPS.

The ORMCP is the only jurisdiction that allows residential lots to be created for retiring farmers on prime agricultural land, subject to certain designated conditions:

Lot creation 32. (1) A lot may be created only in the following circumstances, and subject to Section 15, subsections (2), (3), (4), and (5) of this section, and Part III:

1. *Severance, from a rural lot, of a farm retirement lot or a lot for a residence surplus to a farming operation. The maximum permitted is a cumulative total of one such severance for each rural lot. All consents granted on or after January 1, 1994 are included in the calculation of the cumulative total.*

(<http://www.mah.gov.on.ca/Page1707.aspx>, ORMCP)

2.1.2 Province-wide Agriculture Policies and Regulations

While this study focuses on agriculture within the Greenbelt, many of the issues faced within the Greenbelt are universal and experienced by farmers elsewhere in the province. It is, therefore, important to also understand in a general way the diversity of policies that impact agriculture across the province.

Within the GBP the following is specified:

This GBP builds upon the existing policy framework established in the Provincial Policy Statement (PPS), issued under Section 3 of the Planning Act, and its implementation through municipal official plan policies and maps.

Based on the above, this GBP must be read in conjunction with all other applicable land use planning policy, regulations and/or standards, as amended from time to time.

Whereas the above section relates to the Greenbelt, a similar reality exists for farmers elsewhere within the province of Ontario. For example, farmers within Perth County are subject to the policies of the PPS, the upper, lower, and single tier municipal plans, zoning by-laws, regulations including those under the Conservation Authorities Act, as well as other pertinent legislation (e.g. the federal Fisheries Act) and regulations. The differences are much fewer than the similarities.

In addition, environmental regulations such as Species at Risk, the Ontario Water Resources Act, the Clean Water Act, and the Nutrient Management Act, apply equally across the province of Ontario. The Environmental Farm Plan (EFP) is an example of a program that

was put in place to assist farmers across Ontario in adopting best management practices for environmental improvements.

Within the Greenbelt, it is important to note that farmers have received some additional support through funding provided by the Friends of the Greenbelt Foundation that was not available to farmers outside of this area. For example, farmers who received funding through the Environmental Farm Plan (EFP) to complete identified projects received additional funding through the Foundation. While participating farmers outside of the Greenbelt received 30-40 per cent cost share for the completion of projects, the additional funding from the Foundation increased their cost share to 70 per cent or more.

2.1.3 The Natural Heritage System in the Greenbelt Plan

As will be discussed further in this report, the Plan's Natural Heritage Features and Key Hydrologic Features Policies stand out from both the perspective of the farmers, notably in Halton and Niagara Regions, and some municipal planners. In order to gain a more thorough understanding of these perspectives, it is important to consider the actual policies as described within the GBP.

The following extract from the GBP is a listing of Key Natural Heritage Features and Key Hydrologic Features. These features are generally consistent with the direction of the PPS but do include mention of specific features (such as intermittent streams) that have been identified in this research as creating specific challenges within the Greenbelt.

3.2.4 Key Natural Heritage Features and Key Hydrologic Features Policies

Key natural heritage features include:

- *Significant habitat of endangered species;*
- *Threatened species and special concern species;*
- *Fish habitat;*
- *Wetlands;*
- *Life Science Areas of Natural and Scientific Interest (ANSIs);*
- *Significant valleylands;*
- *Significant woodlands;*
- *Significant wildlife habitat;*
- *Sand barrens, savannahs and tallgrass prairies; and*
- *Alvars.*

Key hydrologic features include:

- *Permanent and intermittent streams;*
- *Lakes (and their littoral zones);*
- *Seepage areas and springs; and*
- *Wetlands. (GBP, pg. 19)*

Section 3.2.4 identifies a range of policies pertaining to Key Natural Heritage Features and Key Hydrologic Features Policies. These policies aim to protect key features and establish buffers

intended to ensure their long-term viability.

3.2.4 Key Natural Heritage Features and Key Hydrologic Features Policies

For lands within a key natural heritage feature or a key hydrologic feature in the Protected Countryside, the following policies shall apply:

1. *Development or site alteration is not permitted in key hydrologic features and key natural heritage features within the Natural Heritage System, including any associated vegetation protection zone , with the exception of:*
 - a. *Forest, fish and wildlife management;*
 - b. *Conservation and flood or erosion control projects, but only if they have been demonstrated to be necessary in the public interest and after all alternatives have been considered; or*
 - c. *Infrastructure , aggregate, recreational, shoreline and existing uses , as described by and subject to the general policies of section 4 of this Plan.*
2. *Beyond the Natural Heritage System within the Protected Countryside (as shown on Schedule 4), key hydrologic features are defined by and subject to the natural features policies of Section 3.2.4.*
3. *Beyond the Natural Heritage System within the Protected Countryside (as shown on Schedule 4), key natural heritage features are not subject to the natural features policies of Section 3.2.4 of this Plan, but are to be defined pursuant to, and subject to the policies of, the PPS.*
4. *In the case of wetlands, seepage areas and springs, fish habitat, permanent and intermittent streams, lakes, and significant woodlands, the minimum vegetation protection zone shall be a minimum of 30 metres wide measured from the outside boundary of the key natural heritage feature or key hydrologic feature.*
5. *A proposal for new development or site alteration within 120 metres of a key natural heritage feature within the Natural Heritage System or a key hydrologic feature anywhere within the Protected Countryside requires a natural heritage evaluation and hydrological evaluation, which identify a vegetation protection zone which:*
 - a. *Is of sufficient width to protect the key natural heritage feature or key hydrologic feature and its functions from the impacts of the proposed change and associated activities that may occur before, during, and after, construction, and where possible, restore or enhance the feature and/or its function; and*
 - b. *Is established to achieve, and be maintained as natural self-sustaining vegetation.*
6. *Expansions to existing agricultural buildings and structures and farm and non-farm dwellings, together with accessory uses, are permitted in key natural heritage features, subject to the existing use policies of Section 4.5 of this Plan.*

7. *Notwithstanding the natural features policies of section 3.2.4 of this Plan, new buildings and structures for agricultural uses will be required to provide a 30 metre vegetation protection zone from a key natural heritage feature or key hydrologic feature, but may be exempted from the requirement of establishing a condition of natural self-sustaining vegetation if the land is, and will continue to be, used for agricultural purposes. Despite this exemption, agricultural uses should pursue best management practices to protect and/or restore key hydrologic features and functions. (GBP, pg. 20)*

3

Farmer Perspectives on the Greenbelt Plan

3.1 Summary of Focus Groups and Interviews

Facilitated focus group discussions (FGDs) were conducted throughout six regions of the Greenbelt – Durham, Peel, Halton, Hamilton, York, and Niagara. These discussions all followed the same format, with the same specific agenda. An attempt was made to specifically select farmers who had expressed having had challenges with GBP policies. Summary results from each FGD appear in Appendix 1.

Several farmers who participated in the FGDs agreed to follow-up interviews in order to provide a more thorough understanding of the issues they identified. Their additional input has been combined with what was heard in the focus groups and is described in short summaries of their stories included in text boxes through this chapter of the report.

Most of the issues presented by the farmers related to policies and challenges unrelated

to the GBP. This is perhaps not surprising, given the range of provincial and municipal policies and regulations that touch on agriculture.

Several themes that were noted from the workshops and farmer interviews will be reflected on in Chapters 5 and 6.

3.1.1 Key Perspectives from the Agricultural Community: Challenges – What the Farmers Told Us

Farmers identified the following 10 issues, almost all of which are not directly related to the policies of the GBP.

Common Challenges Identified Across All Regions

1. The multiplicity and layers of regulations were identified as a major challenge and cause for frustration; this includes provincial plans (GBP, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan), Species at Risk legislation and regulations, Nutrient Management legislation and regulations, Source Water Protection legislation and regulations, municipal bylaws and other regulations, and Conservation Authority rules. Many farmers suggested that successfully navigating through the layers of regulations takes much longer now than in the past.
2. Inconsistency in interpreting provincial policies and regulations across municipalities and conservation authorities. Farmers who owned land in separate municipalities reported differences in interpretation between them that they didn't think was the result of differing circumstances.

One farmer's perspective: Hamilton

This farmer has a 2,000-acre cash crop operation, specialized in producing hay for horses. He has a core group of about 50 clients, including Marineland. He has no specific issues with any Greenbelt policies. However, farming is challenging in a near-urban environment. "If you want to put up a grain bin in the City of Hamilton, you would think you were putting up an atomic bunker." This farmer identified the planners' lack of understanding of agriculture as well as municipal regulations causing problems for his operation. He also identified long-term economic sustainability of farmers within the Greenbelt as the biggest challenge facing agriculture in the region.

"While the land is protected, the farmers who farm within it are not. In the past, we were buffered by high land prices. We don't have the large cash crop farms, but in the end, we would get a lot of money for the land and it would work out all right."

Key Point: *This farmer feels that challenges of farming in near urban areas are no longer offset by the ability to sell land for speculative prices to land developers.*

3. Inconsistent objectives between ministries – for example – OMAF promotes expanding “value added” enterprises on farm, some MNR policies make achieving this more difficult.
4. Lack of understanding and appreciation of agriculture on behalf of planners and other municipal staff, politicians, and the public generally. This contributes to the inconsistent interpretation noted in 2 above and in problems with reconciling different policies and regulations. Farmers noted that Greenbelt messaging suggests to the public a very idealized version of farming, whereas a more realistic portrayal would be more beneficial.
5. Cost to farmers associated with meeting the requirements of the various regulations, be it to hire one or more experts, prepare the necessary documentation, etc.

Challenges Identified in One or More Region

6. There is a perception that the GBP has allowed Conservation Authorities and/or the Ministry of Natural Resources to inappropriately expand their mandate. A key reason why this perception exists is because of situations where the designation and/or mapping of natural heritage features has been done without making landowners aware and without ground truthing aerial photographs. For example, land planted in tree nurseries, left fallow, or deliberately seeded down for soil conservation practices may be identified as “natural heritage” by a Conservation Authority. The farmer is then required to provide proof that the land has been and/or is being actively farmed.
7. There is a specific concern expressed strongly in Niagara that the phrase “key hydrological features” is being misinterpreted – giving roadside ditches, irrigation canals, intermittent streams, and farm swales the same protection as rivers. Once identified as such, these features are then subject to setbacks and EIS requirements. This adds costs to farm operations and forces on-farm buildings onto productive land rather than on more marginal land where farmers would prefer to build.

One farmer’s perspective: Durham Region

This is a large-scale poultry and cropping operation, including a country store that sells eggs, chicken, and local produce. The issues experienced in this operation are not related to the GBP. Challenges have occurred with local city planning policies that require a site plan in order to construct a new barn. As a result, Oshawa and Durham required the road in front of the barn be widened.

"The biggest problem is how planning staff between regional and local level have no consistency with how they are managing agriculture."

Key Point: *This farmer suggested that different jurisdictions have different interpretations of the same policies and regulations. Having more consistency and better understanding of agriculture would be an improvement.*

8. There are challenges in selling land in close proximity to a developed area. Sometimes it is too close to residential or commercial developments (as in, across the street) for other farmers to want it. In the example raised, it was noted that urbanites looking for a country estate do not want to buy it, and developers are not interested either because it has restrictions on development.
9. Concern that there was an inconsistency in the original delineation of Greenbelt boundaries where certain lands were included and other lands were excluded. This comment tended to vary depending on location within the Greenbelt and the perspective of the individual farmer.
10. Overall cynicism that providing input will lead to positive changes. Farmers reported that many issues were identified in initial consultation phases of the Greenbelt Act and Plan, which they felt were ignored. Maps in the Natural Heritage System presented in the consultation phase in 2004 were reportedly not the same as the maps that were presented in Natural Heritage System, Schedule 4, 2005, GBP.

The Greenbelt, by definition, consists of lands in proximity to urban areas. It is not surprising, therefore, that some of the issues raised are associated with near-urban agriculture and is consistent with other research. Cummings and Juhasz in 2007 identified a number of similar results and in a 2005 study, Bunce found that operations located in near-urban areas faced some additional challenges. These included: (i) having to defend normal farming practices; (ii) social isolation as traditional farm communities become more populated by non-farmers; (iii) lack of political influence; (iv) increased taxes to support new services for non-farm residents; and, (v) reduction in local farm services. Topsoil dumping, vandalism, theft, and damage from road salt were also found to cause more problems for farmers in near-urban areas than for those located in more rural settings. However, increased traffic seemed to be causing the most serious challenges to farmers at that time in this region.

One farmer's perspective: Niagara Region

This two-generational operation that produces crops and maple syrup, places an emphasis on agri-tourism since selling their dairy cows seven years ago. This farm falls under the jurisdiction of the Niagara Escarpment Plan and therefore the Niagara Escarpment Commission (NEC). This farmer expressed frustration at the multiple layers of regulation. Already dealing with NEC, they must also comply with municipal and regional regulations as well as with rules from the Conservation Authority.

"I'm wondering if there are too many bodies to deal with and too many regulations."

Key Point: *This farmer is concerned that there are too many regulations from too many different regulating bodies which increase complexity and cost without adding real value.*

More recently, the Golden Horseshoe Food and Farming Action Plan identified the following challenges experienced by farmers in the near urban setting:

- *fierce competition for land which: drives land prices beyond the reach of farmers and results in the conversion of farmland to other uses; impedes the development of new businesses and the expansion of existing businesses;*
- *multiple, disjointed regulations and policies that detract from the ability to do business efficiently;*
- *congestion that negatively affects the efficient movement of goods and the cost of transportation;*
- *expanding urban-based infrastructure that impacts the ability to farm efficiently.* (Golden Horseshoe Agriculture and Agri-Food Strategy. Food and Farming: An Action Plan 2021. pg. 2)

3.1.2 Key Perspectives from the Agricultural Community: Positives – What the Farmers Told Us

Along with frustrations, many farmers told us that they do want prime agricultural land protected from development and from that perspective, appreciate the intent of the GBP. Farmers who are in early or mid-stages of their careers reported that they were able to proceed with business investment knowing that neighbouring land would not be sold for development in the near future. For example, a large dairy operation and an orchard operator both reported investing in a new barn and in trees because they were reassured that they would be able to continue farming. Other farmers also noted the benefits of having a large, available market for certain kinds of agricultural activities.

One farmer's perspective: Durham Region

A family farm for over 150 years, this operation relies on agri-tourism and direct marketing to consumers. "We sell what we grow, and attract people back. People know it is an authentic experience and that we can actually grow and take care of the food we are selling." Because of the focus on agri-tourism, plans for the business include building a small café on-farm. The farmer is currently working with local planners to get through the regulatory process in order to obtain the necessary approvals.

"The GBP has not given us any problems."

Key Point: *This farmer notes that the biggest issue with the Greenbelt is that if farmers within it cannot be profitable, agriculture will not survive, regardless of the protections given to the land.*

This is consistent with what the 2005 Bunce study found. Opportunities experienced in near-urban areas like the Greenbelt include factors related to proximity to a large urban market. For example, sod farms, pick-your-own operations, fruit and vegetable farms, and horse farms tend to benefit from a near-urban location. One farmer in the Bunce study noted that road improvements made to facilitate development also improved access and enhanced local marketing opportunities.

3.1.3 Key Perspectives from the Agricultural Community: Suggestions for Improving Policy from an Agricultural Perspective – What the Farmers Told Us

In both the FGDs and the interviews, farmers were asked for suggestions to improve the Greenbelt policies from an agricultural perspective. Just as the challenges identified are largely non-GBP specific, so too were the suggestions. These suggestions were broad ranging in scope – with some being very specific and some considering policy in a much broader way. Farming across the Greenbelt is very diverse, yet most of the issues identified were fairly consistent, with the exception of the specialty crop area in Niagara Region.

A complete listing of suggested improvements can be found in Appendix 2, but the original suggestions have been summarized and categorized below. Suggestions tended to fall into one of three categories – environment, economic, or regulatory.

One farmer's perspective: York Region

This farm was just breaking into the racehorse breeding business when changes in provincial funding of this industry led to a severe downturn. The farm family is now in a state of transition and attempting to discover a new way to make a living and stay on the farm. GBP policies have not impacted the farm operation, however natural limitations of the soil prevent certain kinds of intensive farming such as cash crop or livestock. As a result, the farmer would like to provide services to the public such as agri-tourism and add value to products produced on the farm by opening a tearoom serving homegrown food. This farmer would appreciate more restrictive regulations within the Greenbelt that permit additional operations on farms as long as the operations comply with strict guidelines around environmental practices. For example, this farmer would like to operate eco cabins and invite tourists to celebrate the unique environment within the Greenbelt. "Let me farm very creatively here," she suggested.

"The Greenbelt regulations should enable farmers to stand on their own two feet by allowing us more creative ways to live off our land."

Key Point: *This farmer feels that regulations should give farmers the flexibility to be creative, while more restrictively protecting the environment.*

Figure 2: Suggestions for Improvement from an Environmental Perspective



Many suggestions made by farmers were repeated throughout the FGDs and interviews. In general, most farmers feel they are good stewards of the land and that more flexibility in implementation

One farmer's perspective: Halton Region

This is a broiler chicken operation that includes a woodlot. This farmer has not had specific issues, but suggests that often people do not realize there are problems until they apply for a building permit. Further, he suggests that agriculture has taken a backseat to other interests. "Halton has gone over and above what the Greenbelt intended. We are seeing that agriculture has become the red-headed stepchild and is last on the list." Specifically, this farmer describes issues with natural heritage systems that have been created by linking woodlots and wetlands, thus incorporating fields and farmlands that lie in between these areas. This farmer also suggests that not all of the best farmland in Halton Region has been protected, while some of the less productive is protected and cannot be developed.

"If the goal is to protect agricultural land, why wouldn't they protect all class 1, 2, and 3?"

Key Point: *This farmer is concerned that the protection of prime agricultural land for agriculture is not the outcome of current policies. Other interests, such as natural heritage, override agricultural interests and some prime farmland was left out of the Protected Countryside area, while some less productive land was included.*

One farmer's perspective: Hamilton

This dairy farmer milks about 70 cows, and crops about 750 acres. He did not have issues specifically with the GBP. However, he noted the length of time required to obtain approvals and the lack of municipal staff with an understanding of agriculture. Prime agricultural land should be preserved for farming, but he suspects that the Greenbelt boundaries will eventually be pushed outward due to development pressure as he does not feel that these boundaries will remain fixed forever.

Key Point: *This farmer is concerned that obtaining approvals now takes much more time than in the past – partly due to the number of regulations and partly due to lack of understanding of agriculture on behalf of planners.*

of some of the policies would allow them to make the best use of their productive land while continuing to protect the environment. Farmers would also appreciate more consistency in the interpretation of regulations across regions. Producing food and protecting the environment are not mutually exclusive – discovering commonalities and determining priorities for each could enhance collaboration and cooperation between stakeholders, achieving fairness between both environmental and agricultural interests. Farmers would also appreciate the recognition that farms are places of work where noise and dust are produced – recreational uses such as trails are not always compatible especially during certain seasons of production.

Figure 3: Suggestions for Improvement from an Economic Perspective



Protecting the land by protecting the farmers was one theme that came out strongly throughout the consultation process with farmers. Agricultural viability is a challenge across the province in most sectors and is a challenge not easily surmounted. Farmers in the Greenbelt do have the

advantage of being located in close proximity to their market. In order to enhance their viability, they suggested policies that encourage value-added enterprises that enable them to capture the value of the near-urban setting. Using the Greenbelt as a marketing tool with its own brand was another suggestion, as was the development of a provincial food strategy. Farmers also felt that a higher recognition of the economic benefits provided by agriculture in this very unique region would help in the development and implementation of more effective policies.

Figure 4: Suggestions for Improvement from a Regulatory Perspective



One farmer's perspective: Peel Region

This farmer operates an orchard, cidery, and bakery within the Niagara Escarpment Plan (NEP) area and has been a representative for the Ontario Federation of Agriculture. He indicated concern about how the original line was drawn to designate the Protected Countryside and is concerned that all prime agricultural land was not included. He suggested that he is not that familiar with the GBP policies specifically because his land is covered by the NEP implemented by the Niagara Escarpment Commission. This farmer is concerned with the disappearance of supporting agricultural infrastructure within the Region and feels that what little agriculture is left doesn't have the infrastructure to support it.

Key Point: *Farm land can be best protected by protecting the economic viability of farmers including ensuring appropriate agriculture services. He suggests that a long-term provincial strategy on agriculture and food is needed.*

Farmers suggested that a better understanding of agriculture among planners and policy makers would help all stakeholders achieve better outcomes. Some farmers suggested the development of an agricultural advocate to both help them navigate the regulatory challenges as well as to provide a voice for agriculture. Some farmers felt that it would be an improvement if the bodies responsible for developing and implementing policies and regulations would be more accountable and approachable.

One farmer's perspective: Niagara Region

This farmer is a grape grower, and has been on both municipal council and the agriculture advisory committee. This farmer indicated issues with mapping developed by the Ministry of Natural Resources in the Niagara Region. The mapping was developed to include irrigation canals, roadside ditches, and farm swales as key hydrologic features. Once they were designated as such, they were subjected to protection through setbacks and requirements for EIS as identified in the GBP. This is an issue in the Niagara Region because the nature of farming here means that the farm sizes are smaller and there is a much more extensive system of irrigation canals that have been developed and maintained by farmers. Small farm sizes coupled with an increased amount of land that is required for setbacks from ditches, swales, and irrigation canals, has resulted in farmers being forced to site buildings on productive land.

Key Point: *Farmland can be best protected by protecting the economic viability of farmers including ensuring appropriate agriculture services. He suggests that a long-term provincial strategy on agriculture and food is needed.*

4

Planner Perspectives on the Greenbelt

Professional planners are responsible for the development and implementation of land use policy that impacts agriculture within the Greenbelt. This occurs at the provincial, regional, and local levels. Conservation Authorities also have a role. At the farm level, land use policy is most directly implemented through municipalities. Consequently, in order to complement farmer perspectives on the Greenbelt this study conducted a survey of planners at the municipal and conservation authority level. Additional interviews were conducted to clarify results and a workshop was held with planners. The following discussion shows the actual feedback from planners. This information helps to build the findings presented in Chapters 5 and 6.

4.1 Summary of Planner Survey and Interviews

Senior municipal planners throughout the Greenbelt as well as planners from the conservation

authorities were contacted in November of 2012 to request participation in a survey designed with input from the advisory committee. The survey was intended to discover what issues, from the planners' perspectives, were affecting farmers within their jurisdictions. The original questionnaire can be found in Appendix 3, while the complete survey results appear in Appendix 4. Survey respondents came from 39 municipalities, regions, and conservation authorities.

The survey results were enhanced through interviews of a select number of planners. Fifteen planners were contacted, 13 provided interviews. The results of these interviews are included with the relevant sections of the planner surveys.

Approximately half of the planners who responded to the survey had had experience with farmers having some difficulty securing planning permission. While this does not speak to frequency or the significance of the concern it does reflect the overall extent of the concern.

Building Permit Approvals

Planners were asked to identify the types of buildings that experienced challenges at the building permit stage. Not surprisingly, perhaps, the biggest single challenge was securing permission for the establishment of livestock barns. Approximately 63 per cent of the planners had had at least one experience where this had been challenging for farmers (driven by the application of MDS which seeks to locate livestock operations where they can grow and prosper with minimal impact on neighbours). Approximately one third of planners had dealt with challenging files related to residential farm buildings, greenhouses, and other farm building. Fewer than one in five planners had dealt with a challenging file related to farm gate sales.

Planners who identified they had experience with files where farmers had challenges were then asked to identify whether these problems were specifically related to GBP policies. In other words, if farmers experienced difficulty obtaining a specific building permit, planners identified if they felt it was in some way related to GBP policies.

Results from this question reveal that building permit approval challenges were largely not related to GBP policies. However, in the cases where planners identified on the survey that the Greenbelt policies were related, follow up interviews were conducted.

These interviews provided diverse results. One planner reported that while the Greenbelt policies did not trigger the requirement for a site plan, they did trigger enhanced environmental considerations. Specifically, the planner noted that setbacks from environmental features had pushed the farmer into building on his productive agricultural land. Another planner clarified during the interview that the difficulties in obtaining building permission arose because of ORMCP policies rather than those under the GBP. A third planner offered a similar explanation related to the ORMCP. In this instance, "The way the applicant wanted to site an accessory building meant that he had to encroach the buffer around a key natural heritage feature."

There was also a perspective offered by more than one planner (shared by some farmers) that the numerous and varied policies and regulations were actually affecting the perception more than the reality. "My personal opinion is that the piling on of multiple provincial plans, policies and regulations is the primary issue, generating the perception that rights and practices are being infringed on, rather than a lot of actual hardships for most farmers."

Other Approvals

Beyond the issuance of a building permit there are other instances where farmers may require planning permission. Planners were asked to consider instances where farmers had some difficulty obtaining planning permission related to MDS, tile drainage, home occupation, value-added facility, natural heritage features, municipal water or sewer, completing EIS, or other issues.

Again, planners were asked to specify which of these challenges, if any, were related to GBP policies. The planners surveyed indicated that nine farmers had difficulties obtaining MDS approval and nine did not.

The two planning problems attributed to the GBP were issues connected to a natural heritage feature, and meeting setbacks from environmental features and/or completing EIS studies. From the planners surveyed, eight reported that farmers had difficulty with issues connected to natural heritage, and of these eight, five considered the issues directly attributable to the GBP.

Fourteen planners surveyed reported that farmers had difficulty meeting setbacks from environmental features and/or completing EIS studies. Of these 14 who reported difficulty, six believed the issues were directly caused by polices within the GBP. Six planners reported that farmers had no problems meeting the requirements.

Two respondents identified other instances where farmers had difficulty obtaining planning permission. These included:

- Permanent second dwellings; and,
- An isolated issue associated with a zoning amendment required permitting a dwelling for labour.

The interviews that were conducted helped to provide further clarification around these results. Several planners who identified issues related to natural heritage features suggested that there is a lack of understanding within the planning community about agriculture in general and specifically about its economic importance to their regions. They questioned whether the environmental regulations had evolved to the point where they were trumping agricultural issues, good land husbandry, and compromising farmer livelihoods. The eventual inclusion in local planning documents of irrigation channels, drainage ditches, and intermittent streams were provided as examples of natural heritage features that had an impact on agricultural practices.

Concerns were also expressed related to some of the environmental mapping. One planner detailed how the original mapping of the Natural Heritage System shown in the public consultation process was different from the Natural Heritage System map that was finally adopted in the Plan. In this planner's opinion, the final version looked very different with the addition of hydrological features, connectivity, and other areas.

Lot Creation Approvals

The issue of lot creation was commonly raised throughout this study. Planners indicated in the

survey that rarely did GBP policies create problems in securing planning permission to obtain severances. They reported that 16 farmers did not have difficulty securing planning permission to obtain a severance for a farm split, eight did have difficulty, and of those eight who experienced difficulty, three attributed this to policies within the GBP.

When interviewed, some planners indicated that GBP policies were more restrictive concerning lot creation than elsewhere in the province. This suggests that perhaps a better understanding is required around the issue of lot creation as the policies within the Greenbelt appear to mirror the Provincial Policy Statement.

The survey concluded with two additional, more general questions asking about severance policy and potential delays related to the Greenbelt. The results concerning other severances such as lot line adjustments, retirement lots, secondary business such as grain elevators, and non-farm severances appear to mirror the discussion in much of the rest of the province.

In addition, 38 per cent of respondents identified that farmers have expressed concerns over delays caused specifically by GBP policies, while 62 per cent responded that farmers have not expressed concerns regarding additional delays. However, those who indicated that the Plan created delays also identified the following reasons for the delays, most of which do not appear to be related to the GBP:

- The length of time and the process to justify with a planning authority the need for farm related uses such as secondary housing for farm employees, and new or expansions to value-added farm uses that may be onsite or on adjacent lots. The time and costs associated with completing all necessary studies can make the proposed project no longer cost-effective to complete.
- The Region does not allow tree cutting on agricultural lands that would otherwise allow them to expand their existing farm operation.
- Delays are due to proximity of natural features or environmental areas such as watercourses, woodlots.
- Site plan requirements associated with the Oak Ridges Moraine.
- Cost to process application.
- Delays associated with the Niagara Escarpment Development Permit process
- Additional environmental requirements caused simply by the increased presence of environmental features not as present in other areas of the municipality.
- Delays and costs associated with EIS Guidelines.

4.1.1 Key Perspectives from Planners: Challenges – What the Planners Told Us

As mentioned earlier, professional planners are largely responsible for the development and

implementation of land use policy that impacts agriculture within the Greenbelt. As the results from planner and farmer input were assembled, a number of municipal planners and economic development officers were invited to review results at a workshop. The purpose of this workshop was to review findings and issues, but primarily to identify principles and actions going forward that could address the identified issues or themes.

Taken together, the results of the surveys, interviews, and workshops provide a comprehensive overview of planner perspectives on planning for agriculture within the Greenbelt. In general there is very strong support for the long-term interests of agriculture. Indeed many planners have a strong understanding of agriculture and work closely with the farm community to help move the industry forward. Having said this, planning deals with competing interests that at times can lead to conflict and differing perspectives. The planner input is summarized in Figure 5.

Figure 5: Key Issues - Agriculture and Planning in the Greenbelt – Planner Perspectives



Several common themes emerged, some of which relate to planning regulations, but others which touch upon other diverse topics such as the economics of agriculture and availability of municipal services. Many of these themes were also identified by farmers. These themes are summarized as follows:

1. **Perception vs. Reality:** A commonly held view expressed by planners related to the sense that there is often a perception that the regulatory impacts of the GBP are greater than the reality.
2. **Lack of Understanding of Agriculture:** Agriculture is complex, diverse, and a business. Planners and decision-makers may not have the background understanding or appropriate training to deal with certain issues associated with farming or farm buildings. This gives rise to the potential for issues and resulting delays in granting approvals.
3. **Viability:** Many planners expressed the need to ensure that agriculture is a “viable” activity as they recognized that farming will only remain in the Greenbelt if farmers can make a living. Flexibility was mentioned by a number of planners wanting to be sure that farmers had the ability to change and adapt their farm operation in response to evolving farm trends. Planners also noted that the size of farms varies across the Greenbelt. In specialty crop lands it was suggested that viable farms can be much smaller than elsewhere, and even though 40 acre parcels can be created, additional support for smaller operations would be helpful. This is an issue for succession planning, new farmers beginning, and farmers who want to expand.
4. **Layers of regulations:** While the impacts vary, a number of planners noted that there are differing layers of regulation, which as a minimum can be confusing for farmers. These policies and regulations come from multiple sources including a number of provincial ministries, conservation authorities, and regional and local government. Different provincial plans in close proximity to each other were also flagged as a potential source of confusion. Of interest, there were suggestions that there should be more harmony and consistency in definitions between the Greenbelt and Oak Ridges Moraine Plan. Additionally, it was noted that the different provincial mandates of OMAF relative to MNR can also complicate issues.
5. **Natural Heritage:** Natural heritage issues were discussed by planners. In some municipalities within the Greenbelt the protection of natural heritage features, including setbacks and environmental impact studies, have generated much debate. Niagara-on-the-Lake and Halton Region in particular have issues where the protection of natural heritage features and boundaries for the natural heritage system has caused significant concern and animosity within the farm community.
6. **Environment:** While the protection of environmental features is a core value held by many planners, there are differing views on how this should impact the approach, extent, and relationship to agriculture. Indeed, some planners expressed a concern for what they perceived as a creeping “environmental agenda” that was shifting focus to the detriment of

agriculture and food production.

7. **Preserving farmland:** The protection of farmland is another core value held by many planners. In this respect the Greenbelt has changed development patterns and has impacted speculative property values. Severance policy was also flagged, although there are minimal differences from a policy perspective with the rest of the province.
8. **Municipal Services:** Several planners that were interviewed commented that the GBP policies restricted them from extending municipal services into the rural areas and this hindered people wanting to do more value-added types of agricultural enterprises.
9. **Support Farm Businesses:** Farm businesses provide the essential infrastructure in support of farms. Examples include machinery dealerships and repair, farm supply, grain dryers and elevators, and processing facilities. There was strong recognition of this amongst planners and the need to retain and recruit these services within the Greenbelt. Drainage channels and irrigation facilities are examples of other types of essential infrastructure.
10. **Right to farm:** Right to farm as discussed by planners refers to Ontario's Farming and Food Production Protection Act and also reflects the challenges associated with farming in near-urban locations. This includes more non-farming neighbours and associated risks: such as complaints about farming practices; difficulty moving large, slow-moving equipment on busy roads; and the potential for trespass and vandalism. It is noted that sometimes regulations can be blamed for these challenges when in reality it is simply part of the local context.

5

Reflections

5.1 Farmer and Planner Perspectives

While one might anticipate differences in the perspectives held by farmers and planners with respect to agriculture in the Greenbelt, there are some remarkable similarities. As we review the farmer perspectives identified in Chapter 3 and the planner perspectives presented in Chapter 4, we find that there are many beliefs, principles, and proposed actions that are shared.

The following discussion picks up on key issues, offers reflections from the authors and concludes with key principles that will be further integrated in Chapter 6.

1. Layers of Regulation

While there was general support from both the planners and the farmers for the purpose and objectives of the Greenbelt, there was also a sense that the layers of regulation (i.e. multiple approvals required from different agencies) were frustrating and time consuming. This was identified in all regions as a major challenge. Based on the interviews, both farmers and some planners believe that getting through the various regulations takes

much longer now than in the past. As one planner commented “It applies to all small businesses – they don’t have the horse power to guide them through this. In my opinion – it is far too difficult to get planning approval due to layers of regulations.”

Individual rules and regulations tend to be developed to address specific concerns or problems. In addition, different levels of government are involved because they have a mandate to contribute to solutions and to address different agendas. As we reflect upon the circumstances within the Greenbelt, we are struck by both the competing interests and at the same time an overarching desire to make the Greenbelt a better place to live and farm.

In our view, there is, and has been, a critically important role for the province. The development of the GBP provides a level of coordination that is often absent in other jurisdictions. Likewise, there is a clear role and responsibility for municipalities to address local needs and aspirations.

While these items will be addressed in more detail in Chapter 6, there is a recognition that the complexity associated with different layers of regulation coming from a number of agencies with different interests can frustrate, if not alienate, the farmers who are to be served by the policy.

Principle: Provide coordination and clarity with regards to policy and planning. It is important that the different interests and roles associated with planning for agriculture within the Greenbelt be as clear as possible for the benefit of those who it most directly impacts.

2. Inconsistency in Interpretation

Each municipality (local/region) has a responsibility to incorporate the Greenbelt and other provincial plans into their planning documents. Not surprisingly, this results in interpretation that sometimes differs across jurisdictions. Moreover, individual planners, building officials, and others involved in the planning system may have slightly different interpretations of individual policy and regulations. Individual provincial ministries will also interpret the GBP with a different lens or set of priorities.

In a democratic and multi-stakeholder society, it is beneficial that different perspectives be discussed and understood. However, if we focus on agriculture within the Greenbelt, it would be beneficial to have increased clarity concerning the role of agriculture (such as food production, local economic and rural community development) and in our view this would lead to less inconsistency in interpretation. This may be achieved through either reducing the number of actors (for example consolidating more authority with a single party) or preferably, by making the role and importance of agriculture clearer.

Principle: Increased consistency in provincial and municipal policies should be

encouraged. This is best achieved through providing more clear direction in each policy rather than centralizing authority with fewer decision makers.

3. Competing Provincial and Municipal Mandates

The GBP addresses multiple land use interests. These are captured within the GBP itself, and represent broad public interest in agriculture, natural heritage, urban development, aggregates, and so on. Inherently, these conflicts play themselves out across the province. Within the area of the Greenbelt, however, by virtue of its close proximity to large urban centres these competing interests are even more pronounced. Whereas many, including farmers and some planners, felt the GBP was intended as an agriculture first plan, the actual implementation of the Natural Heritage policies have led farmers and some planners to conclude that agriculture is being treated as less important than protecting natural heritage. Ideally these priorities need to find an appropriate balance, however further clarity in this area would be helpful. The GBP itself actually appears to provide this clarity:

1.2.1 Vision

The Greenbelt is a broad band of permanently protected land which:

- *Protects against the loss and fragmentation of the agricultural land base and supports agriculture as the predominant land use; (GBP, pg. 4)*

The use of the words “predominant land use” has led some to conclude that if the intent is to promote agriculture as the priority, there is an opportunity to further clarify this within the GBP.

Principle: Reconfirm the socio-economic importance of agriculture. Further clarification in this area would help to ensure that efforts at every level are made to ensure agricultural viability.

4. Lack of Understanding

From the perspective of both the farm community and some planners, it was evident that where planners, building officials, and other municipal/provincial employees had a good understanding of agriculture (particularly within the Greenbelt) a positive and progressive relationship tended to follow. Where planners understood agriculture and could discuss related issues with farmers, discussions tended to be solutions-based rather than problems-based. Where good dialogue occurred farmers came away with a much greater appreciation of goals and objectives for the GBP and planners came away with a much better understanding of agriculture’s needs. The result was a much higher probability of making things work.

Principle: Agricultural knowledge can help diffuse issues, build understanding, and facilitate good planning. Increased understanding of agriculture needs to be facilitated both at the municipal level and within provincial ministries that have a mandate within the

Greenbelt. OMAF's expertise in this area can be helpful.

5. Costs

The farm community and planners both identified costs (time and money) due to increased regulations and associated with achieving proper documentation for regulatory approvals and permits. This related to both environmental features and the creation of value-added farm opportunities and other new construction. Additional challenges in the Niagara Region include smaller farm sizes as well as an increased number of key hydrologic features being identified that required setbacks and environmental impact studies.

Principle: The cost of regulation on agriculture and related approval times needs to be reasonable and manageable. This may be achieved through the careful evaluation of the appropriateness of policy requirements as detailed elsewhere within this report.

6. Natural Heritage System Boundary and Delineation of Natural Features

The GBP identifies a natural heritage system and includes definitions of natural heritage features. Concerns remain, especially within the farm community and from some municipal planners, that the delineation of the natural heritage system and the subsequent mapping of detailed features has not been adequately explained nor open to sufficient public scrutiny.

There is also the need to reflect on the requirements of agriculture and the evolving circumstances associated with agricultural production. In some ways policy needs to be outcome based (have we achieved a given objective) rather than administratively based (have we achieved an arbitrary standard). It was frequently mentioned, for example, that orchards and vineyards provide a very stable long-term environment that is very different from other forms of agriculture.

Principle: Standards and mapping of natural heritage features need to be clear, defensible, and open to public scrutiny. Their needs to be a constructive working relationship between municipalities, conservation authorities, MNR, OMAF, and property owners to help ensure that natural heritage features are appropriately identified. While there was much support from farmers and planners for protection of natural heritage features, there was much concern that the criteria and mapping was not adequately clear nor easily amended. There may be an enhanced role for municipalities in this area.

7. Integrating Interests

A significant irritant identified by many farmers (beyond their dislike of the initial process that lead to the creation of the GBP) was the way in which natural heritage issues have become more dominant than agricultural issues. While this has been alluded to elsewhere, it is important to recognize that both agriculture and the environment need to be priorities. Water quality needs to be protected, natural habitats retained, and other

environmental goals need attention. Food production and livelihoods are also a priority. In most respects it is not so much the environmental goals that challenge the farm community, but rather the processes by which they are implemented.

Principle: Agricultural and environmental goals are priorities and should be mutually supportive. It will be important moving forward to strike the right balance between these priorities. Planning needs to recognize that circumstances, population, and property densities vary across the Greenbelt and that implementation needs to reflect this.

8. Agricultural Viability and Sustainability

Agricultural viability and sustainability is an important issue for agriculture throughout the province. Urban pressures impact agriculture and impact the relative viability of different forms of agriculture in different locations. Large-scale livestock production is likely to be less viable in near-urban locations, whereas specialty or niche production that benefits from the direct interface between farmer and consumer is likely to benefit from this proximity. In reality, the viability and sustainability of agriculture in the Greenbelt is far less connected to the GBP itself and is more a function of farming in near-urban circumstances. Having said this, there is the need for a continued focus on enhancing the viability of Greenbelt agriculture.

Principle: Prosperous farms are desirable, they contribute to community well-being, and they are the best way to build support for agricultural land preservation. Farming within the Greenbelt can grow and prosper or it can wither and fade away. While the GBP places relatively few impediments in the way of agriculture it does establish a long-term commitment to the protection of the land base. Equally important will be the programs and initiatives that help to ensure that there are succeeding generations of farmers on this land.

6

Suggested Actions

The GBP has been recognized for its innovative approach to protecting farmland and ecosystems in the Greater Golden Horseshoe. This provincial plan takes an aggressive stance on the establishment of growth limits and requires compliance through regional and local planning documents. It also establishes policies that apply to a huge area around the perimeter of Toronto stretching from Northumberland County in the east to the western end of Lake Ontario and along the Niagara Escarpment to Niagara-on-the-Lake. Most rural lands within the GBP are identified as the Protected Countryside. Within this designation there are several thousand farms. This report is about the future of these farms and how they are impacted by the GBP policies and their implementation.

As we spoke to farmers and planners it was clear that there was no shortage of opinion concerning what works and doesn't work with the policies of the GBP. It would also be fair to say that while there are many shared views on the issues facing agriculture in the Greenbelt, there were few specific examples concerning how the Greenbelt policies have impacted individual farms. While there are generalities such as "we didn't like the approach to the development of the Plan", there were few examples of the GBP causing an individual farmer a specific hardship at the stage of seeking planning permission. More often than not, if there was a problem it was driven by local planning requirement, or in some instances the ORMCP or the Niagara

Escarpment Plan. While there are some exceptions to this finding (notably in Niagara connected to natural heritage policy) the issues were generally in keeping with what one might expect to hear from farmers elsewhere in the province.

While the goals of the GBP are laudable, the province by virtue of establishing the GBP and the Protected Countryside has established a framework that will impact this landscape for generations to come. With this there is a responsibility to ask the question – What will this landscape look like in 100 years?

If the vision is one of agricultural land serving the communities of southern Ontario, it should be recognized that this will not simply happen. It will take a determined, consistent, and long-term commitment to doing the right things – the things that will build capacity within the farm sector, make farms profitable, and increase their value from an economic, environmental, and social perspective.

Without a doubt, the planning system will be instrumental in this context and the GBP can provide the road map for this to happen. In the absence of this concerted effort, it would be easy for the landscape to increasingly move out of agricultural production and assume other functions. The numerous recommendations that were identified by farmers and planners provide insight into how an agricultural vision may be achieved. It is notable that planners when challenged with this task at a workshop identified a number of suggestions and interestingly the number one suggestion was that the socio-economic importance and priority of agriculture must be recognized within planning documents. This isn't about specific tweaks to policy, but is rather about reaffirming a vision of a dynamic, productive, and profitable agricultural sector and taking actions to make sure that this happens.

6.1 Summation of Principles

This research identified a number of issues that are core to the future of agriculture within the Greenbelt. These issues are discussed in Chapter 5 and a series of corresponding principles were identified. These principles provide a foundation for the recommendations of this chapter. These principles are summarized below:

1. Provide coordination and clarity.
2. Increased consistency in provincial and municipal policies should be encouraged
3. Reconfirm the socio-economic importance of agriculture.
4. Agricultural knowledge can help diffuse issues, build understanding, and facilitate good planning.
5. The cost of regulation on agriculture and related approval times needs to be reasonable and manageable.
6. Standards and mapping of natural heritage features need to be clear, defensible, and open to public scrutiny.

7. Agricultural and environmental goals are priorities and should be mutually supportive.
8. Prosperous farms are desirable, they contribute to community well-being, and they are the best way to build support for agricultural land preservation.

6.2 Potential Actions

As noted above, the focus groups, interviews, and workshop provided numerous suggestions that help to inform this report. This chapter builds on this input and organizes proposed directions under four headings:

- *Administration and Implementation*
These strategies can help to improve the way that planning policies and regulations are implemented thereby addressing certain concerns of the agricultural sector.
- *Greenbelt Plan Specific*
Strategies identified under this section are specific to the GBP and its relationship to agriculture.
- *Economic*
Economic strategies can help in the overall and long-term economic opportunities for agriculture within the Greenbelt.
- *Environment*
These strategies focus on the environment and are intended to address certain concerns while promoting agricultural interests and achieving appropriate environmental outcomes.

6.3 Administration and Implementation

The development and administration of provincial and municipal plans involves numerous provincial ministries, many municipalities, and assorted other agencies. Not surprisingly the administration, at least in the eyes of many farmers, is complex. Moreover, this complexity can lead to confusion, lack of clarity, and foster competing interests and the potential for silo thinking. The following proposals are intended to help address this.

- **Strengthen relationships between the province, municipalities, and stakeholders.**
There are many parties with different and, at times, competing interests. This is evident in divergent views held by municipal staff and in divergent interests of provincial ministries and other agencies. From an agricultural perspective there is a concern that there is not adequate dialogue concerning agricultural interests. Improved relationships and communications between the province, upper and lower tier municipalities, as well as other stakeholders, can help enhance understanding and cooperation. This could

be in the form of an annual conference or as a more formal working group of planners and economic development staff. The Golden Horseshoe Food and Farming Alliance's working group is an example of an existing group with a related mandate. This could also help to establish a greater level of consistency or uniformity in the interpretation and implementation of policy.

- **Provide a stronger voice for agriculture.**

There are few activities that are as important to society as food production. There were concerns, however, correct or not, that the voice of agriculture is muted within government and specifically as it relates to agriculture in the context of Greenbelt issues. Specific suggestions included an enhanced advocacy role for OMAF or even the potential for an agricultural ombudsman or agricultural commissioner (with appropriate resources). This position would provide in depth research and understanding, with the intent of advocating for agricultural priorities. This could also help to bring a "rural lens" to policy decisions.

- **Improve agricultural understanding for planners.**

Providing a link between planners and the agricultural sector in order to enhance the understanding of agriculture would be one way to potentially improve policy implementation and delivery. Any number of agencies such as OMAF, the OFA, or the Greenbelt Foundation could potentially help develop and/or deliver agricultural training for planners. Other suggestions include professional training through OPPI or continuing education on agricultural planning offered through planning schools.

- **Build more flexibility into the implementation of the Greenbelt Plan.**

While it can be administratively challenging, policy needs to reflect that agricultural conditions vary significantly across the Greenbelt. There are differences between commodity sectors, farm practices used, and historical farm parcel sizes. Flexibility could be achieved in a number of ways, such as through an enhanced municipal role in policy setting.

- **Ensure more opportunities for public consultation.**

It was reported that the identification and mapping of natural heritage features occurs with minimal public opportunity to review and comment on their accuracy. Given the significance of these features to the farm community there should be the opportunity for public comment.

6.4 Greenbelt Plan Specific

The GBP establishes the context or framework for municipal planning documents and establishes policy for the Protected Countryside. While the specific policies of the GBP were generally not raised as an issue during our consultation there are, nevertheless, opportunities to enhance the position of the Plan relative to agriculture.

- **Create a vision for agriculture within the Greenbelt.**

The GBP identifies agriculture as the predominant land use within the Protected Countryside. It does not, however, provide a vision for the long-term future of agriculture. Such a vision would help establish further clarity and would assist with the interpretation and evaluation of policy. In addition, the vision can direct economic policy as it impacts agriculture within the Greenbelt. The Golden Horseshoe Food and Farming Action Plan could be of assistance in helping to craft a vision for potential inclusion within the GBP.
- **Apply an agricultural lens to implementation of Greenbelt Plan policies.**

The suggested agricultural vision can provide a lens that helps to clarify policy issues emanating from different provincial ministries, agencies, and municipalities. Comments from planners and farmers alike indicated that the voice of OMAF has been somewhat muted relative to some other stakeholders. However, if the GBP truly has a vision of protecting prime agricultural land for agriculture, the language and resulting interpretation requires a stronger emphasis on agriculture. In this context there is the potential for a new campaign on the importance of agriculture within the Greenbelt. This campaign could be delivered by the provincial government and would reaffirm the role of agriculture in the Greenbelt with a commitment to clarify overlapping policy issues.

6.5 Economic

While the GBP is not an “economic plan” it does attempt to create an environment where agriculture can be active, profitable, and productive. A number of strategies have been identified that can contribute to this goal.

- **Protect farmland by actively supporting farmers.**

The GBP provides support for the protection of farmland. Equally important are policies that actively support the farm sector. Examples exist at the municipal, regional, and provincial levels. Such programs will need to evolve with time to ensure relevance and a fit with changing markets.
- **Develop a strategy to demonstrate support for local food production.**

Agriculture across the Greenbelt is diverse. In some areas, production agriculture dominates, including crops and livestock. In other areas, there are opportunities for direct sales and value added activities. Agriculture in all its forms is well positioned to take advantage of the proximity of large adjacent urban market. Farmers’ markets, roadside stands, industrial applications, and community-supported agriculture (CSA) are all examples. Local procurement policies (municipal and other public sector institutions) are one way to demonstrate support for local food production. Other examples include online marketplaces such as OntarioFresh.ca, GreenbeltFresh.ca, and the Greenbelt Farmers’ Market Network.

- **Enable value added farm enterprises.**

The planning system (local and provincial) has often wrestled with how best to support value-added farm enterprises. Secondary processing, agri-tourism and related farm sales are increasingly recognized as a diversification strategy that can enhance farm viability. While related policy options are perhaps best facilitated through the provincial policy statement and local and regional planning documents, support in this sector will build agricultural potential. An interesting variation on this idea was the suggestion of an agricultural enterprise zone where certain agricultural diversification strategies would be permitted and encouraged.

It has also been suggested that a Rural Community Improvement Plan could be used to develop policy in support of local food production as well as on-farm value-added enterprises. This would be a benefit not only for the farmers involved, but also from a local economic development perspective.

6.6 Environment

While the focus of this study has been the relationship between the Greenbelt and agriculture, much attention was devoted to environmental and natural heritage issues. Both farmers and planners identified natural heritage issues as a source of friction within the Greenbelt. The following strategies recognize that environmental objectives are achieved from differing types of actions ranging from the regulatory to the voluntary. While there will always be a role for the regulatory, voluntary, and educational strategies are sometimes more effective. Moreover, agricultural issues need to be profiled relative to environmental issues.

- **Recognize environmental goods and services provided by farmers.**

Many farmers consider themselves environmentalists. Agriculture in its own right provides many natural heritage and environmental positives. This provides broader benefits to society as a whole, and perhaps while not completely replacing natural heritage features, agricultural operations such as woodlots, orchards, and vineyards provide environmental benefits. Best management practices (BMPs) have been developed to improve management of these resources and this can enhance their overall environmental benefit.

- **Strengthen Environmental Farm Plan support.**

The Environmental Farm Plan is a highly successful voluntary program that has proved to be a positive way of helping farmers work together with government to address environmental concerns. The program itself helps identify environmental challenges, and past funding has helped farmers to address the identified challenges. Funding cuts to the program have limited the financial assistance available to farmers and reduced uptake of the program overall. It is noted, however, that the Greenbelt Foundation has contributed funding to enhance cost-share rates.

- **Greater clarity with mapping natural heritage features.**

The delineation and protection of natural heritage features is an important objective of the GBP, the provincial policy statement, and local and regional planning documents. There are, however issues as natural heritage goals have been pursued with corresponding impacts on farms. These are dealt with elsewhere within this report and other related actions have been identified. Actions to improve the way natural heritage features are identified and mapped would be positive. Increased transparency on the part of the agencies who make these decisions, and improved incorporation of community input would help produce maps to meet both agricultural and environmental objectives. Additionally there may be opportunities to integrate provincial and municipal data sources to ensure the most accurate mapping possible.

- **Balancing provincial and local interests.**

Within Ontario the planning system attempts to balance local and provincial interests and priorities. This significant provincial involvement has lead to a coordinated planning system that is effective in dealing with regional issues. There is a balance, however, in that certain criteria and mapping may be best identified and dealt with at a local level. There is a need to streamline or minimize environmental analysis requirements for new farm buildings and structures. This is an example of the opportunity to balance provincial and local interests.

Conclusion

The GBP has been championed by some and chastised by others. Within the farm community there was initial resentment and for some this resentment has continued.

Since the adoption of the GBP in 2005 there have been suggestions that the GBP has compromised the ability of the farm community to farm. To address this and understand these sentiments this study was commissioned by the Friends of the Greenbelt Foundation with the following two key objectives:

1. Identify the actual challenges and barriers faced by individual farm operations and the potential solutions from the perspective of farm operators across the Greenbelt; and,
2. Provide specific policy, program, and other recommendations to address the challenges and barriers identified.

The results demonstrate that many of the issues identified by farmers and planners are not restricted to the Greenbelt. Long-term agricultural sustainability is an issue across the province

and has long been identified as a challenge. Net Income Stabilization Account, Canadian Agricultural Income Stabilization, Agra-invest, and Agri-stability are all safety-net programs used over the past decades that were designed to help address these issues.

There are, however, challenges and opportunities associated with farming in near-urban locations. In many instances and in other jurisdictions, these challenges have compromised the ability of the farm sector to grow, prosper, and perhaps most importantly pass from one generation to the next. These changes can have a deleterious effect on the agricultural landscape as it evolves from the function of producing food.

There is, however, an opportunity and perhaps imperative in the face of evolving trends such as climate change and increasing energy prices, to promote food production on a local and regional level. Indeed the trend towards local food, including food produced from production agriculture, is being driven by society as a whole. It is from this perspective that the GBP creates an opportunity to guarantee the long-term availability of these lands for agricultural production. It will, however, take more than simply protecting the land. Concerted focused action in support of the agricultural industry will be required. Indeed, the recommendations of Chapter 6 extend beyond the immediacy of the GBP to include economic and governance perspectives.

