

Concerns about the Golden Horseshoe Greenbelt and Related Legislation

A CFFO Policy Statement

1. Introduction

The Christian Farmers Federation of Ontario¹ has concluded that there is much for us to applaud in the present spate of proposed provincial guidance to manage urban sprawl, enable the future of food production and protect our natural heritage². However the combined programs miss the mark in a number of important ways. The following is a summary of our major concerns and the chief proposals that we believe will succeed.

2. Too Big, Too Far and Too Much Risk from Urban Infrastructure

A million acres will take lifetimes to get to know. It is very far from urban cores. It will be accessible only by auto. Urban infrastructure such as 400-series highways, dumps, gravel extractions are not banned. Wherever such infrastructure is allowed is exactly the opposite of a greenbelt.

Recommendation #1

Move the protection to lands much closer to existing developed areas, including some to the 100,000 to 200,000 acres already designated for future urban development. Create a number of smaller greenbelts, accessible to urban transit with ironclad guarantees that urban infrastructure will not be allowed.

3. Too Much Good Farmland Has Been Excluded

Much of the land between the cities on the western shore of Lake Ontario and the proposed Greenbelt has much higher capability for agriculture than the lands inside the proposed Greenbelt. These 175,000 acres have the potential to become vital resources for local food, accessible agri-tourism and countryside vistas.

¹ 4,300 family farm entrepreneurs across Ontario.

² Golden Horseshoe Greenbelt Act, Greater Golden Horseshoe Places to Grow, Provincial Policy Statement under the Planning Act, Agricultural Advisory Team Advice.

Recommendation #2

Change the growth plan to encourage more development outside the Greater Toronto Area, to Fort Erie and, Peterborough and other locations not surrounded by high capability farmland.

4. Stronger Farmland Policies

We are very supportive of a number of the proposed changes to the Provincial Policy Statement under the Planning Act designed to keep urban sprawl and scattered development off farmland:

- Do not permit any further fragmentation of the land base.
- Stop all urban and scattered development on specialty crop lands.
- Stop all severances on prime farmland except for farm purposes.

Recommendation #3

Confirm these farmland protection polices as part of this broad planning program.

5. Strengthening Land Use Polices to Support the Business of Farming

We are troubled by the protection language often used when referring to farming and farmland. Farming is a dynamic sector of the economy and needs supportive rules and programs so that it can change to meet new opportunities and serve a growing population. Protecting farmland from sprawl and scattered development is just the beginning.

We propose a number of ways to strengthen the viability and guarantee the environmental stewardship of the business of farming through the Provincial Policy Statement:

- Distinguish urban development from countryside development: size of lot, differences in public services and infrastructure, nature of economic activities, especially agriculture and environmental services – where urban ends and countryside begins.
- Define agriculture broadly to include a wide range of value-added and on-farm activities.
- Define permitted uses (auxiliary uses) broadly but limit the size and intensity in order to maintain the countryside character.
- Add a new policy to guide farm development: “Agricultural development patterns will be compatible with local environmental resources and the local built community. Specifically:

- a) The size and intensity of agricultural uses will be compatible with the long-term carrying capacity of the environment;
- b) The location of agricultural uses will be compatible with the built community.”
- Remove the built in expansion factor for new livestock facilities in the Minimum Distance Separation (MDS) formulae.
- Allow the expansion of existing livestock facilities by up to 25% beyond the limits of MDS in lieu of specific modifications – inconvenience created by the facilities kept at a comparable level. (Eligibility requirements: caused by recent severance, carrying capacity of the property, approval by Committee of Adjustment.)
- Allow severance of surplus houses under unique conditions only.

Recommendation #4

Focus the Agricultural Policies in the Provincial Policy Statement on enabling the business of farming.

6. Protected Countryside and the Provincial Policy Statement

There is no sound basis for different land use rules for farmland and the business of farming in the proposed protected countryside and the rest of Ontario. The long-term goal of both sets of policies must be permanent boundaries for cities and for farming. Creating permanent boundaries for specialty crop land everywhere in the province is a good beginning.

The advice of the Agricultural Advisory Team is appropriate for all agricultural areas. The programs that are needed to develop a strong economy in the protected countryside are important to all of our communities that rely on agriculture for its economic engine.

One of the risks of weaker farmland protection policies outside the greenbelt than inside, is leapfrog development onto good farmland to the south, west and north of the greenbelt lands. We need firm land use designations everywhere to direct development to the poorer farmlands.

Recommendation #5

The farmland and farm business policies in the protected countryside and the Provincial Policy Statement should be mirrors of each other.

7. Good Advice from the Agricultural Advisory Team

We endorse all of the advice of the Agricultural Advisory Team. On four of their points we offer additional advice.

- One of the needed additions to the Farming and Food Production Protection Act is a disclosure statement that advises new owners in proximity to farming activities that farming can cause inconveniences from time to time.
- We support, in principle, the expansion of permitted uses on farm properties. However, the issue of how to assess these activities for property tax purposes has not been resolved.
- CFFO supports the AAT's advice to avoid direct compensation for the asset appreciation that is reversed when land is permanently dedicated to farming or natural landscapes in the protected countryside and elsewhere in the province. However, this decision has economic impacts that can not be ignored.
- The best response to the loss of perceived value is to make sure that all those who own farmland have good opportunities to develop viable enterprises. A key to this is the AAT's advice on environmental payments. Society now expects the protected countryside and farm landscapes to provide environmental services such as clean water and fresh air. The creation of a greenbelt makes the delivery of these services an official expectation. Society cannot expect to receive these free. The environmental and natural benefits delivered by the few need to be financially rewarded by the many.

Recommendation #6

Adopt all of the advice from the Agricultural Advisory Team as an urgent priority.

Recommendation #7

Add a disclosure statement to the Farming and Food Production Protection Act. The statement should advise new owners in proximity to farming activities that farming can cause inconveniences from time to time.

Recommendation #8

Organize a substantive consultation on the needs of the countryside economy, the options for strengthening it and taxation approaches.

Recommendation #9

Establish immediately an Environmental Payments Task Force to document the services for which farmers and countryside landowners should be paid and to propose long-term guaranteed sources of the funding needed.

8. Limiting the Impact of Urban Development on Farming Opportunities

We are encouraged by the significant initiatives in the Provincial Policy Statement under the Planning Act that will moderate the future impact of urban development on farming opportunities. We are particularly encouraged by:

- Proposals to set population density targets for cities.
- Supporting a higher level of brownfield development and urban redevelopment.
- Giving transit friendly development a higher priority.
- Plans to use “be consistent with” rather than “have regard to.” An outcome based planning process will have more success than one that emphasizes process.

Recommendation #10

Amend the Provincial Policy Statement and the Planning Act so that the future impact of urban development on farming opportunities will be moderated.

9. Failing to Break the Pattern of Growth on Our Best Farmland

We are very disappointed that existing high growth areas in the Greater Golden Horseshoe are designated as the future high growth areas. This can only result in an endless pattern of paving over our best farmland. Better land use policies and greenbelts, by themselves can only slow the process. They cannot break the market-driven insatiable appetite of cities bulldozing the lands along their periphery.

The future must be different. Priority investment should go to those communities that demonstrate a serious commitment of increased density, brownfield redevelopment, transit friendly development and staying off farmland. Municipalities should not be allowed to expand housing if no new jobs are being created in their communities.

Recommendation #11

Commit priority investment to those municipalities that are committed in their land use plans to breaking the market-driven appetite for development on farmland.

*Executive Board
Christian Farmers Federation of Ontario
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