



LONG-TERM THINKING FOR TODAY'S ISSUES

March 22, 2023

Provincial Land Use Plans Branch
Ontario Ministry of Municipal Affairs and Housing
College Park, 13th Floor, 777 Bay St.
Toronto, ON
M7A 2J3
Via email: greenbeltconsultation@ontario.ca;

Re: Amendments to the Greenbelt Plan, Amendments to the Greenbelt Boundary Regulation and Redesignation of Land under the Oak Ridges Moraine Conservation Plan

Dear Ministry,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

The CFFO is concerned about the protection of productive agricultural land. This land is highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services.

The farming community, along with many in the province, have expressed their anger, frustration, and sense of betrayal over the recent decision to remove land from the Greenbelt for housing development. Your government often repeated its promise to leave the Greenbelt untouched. This is clearly a promise broken to the electorate of Ontario.

We request that the government reconsider this decision to remove land from the Greenbelt.

The CFFO strongly objects to this removal on the basis of the significant farmland and natural area loss that will result and because of the increased risk this precedent will set for future losses.

The CFFO continues to recommend that:

- Protection of land within the Greenbelt must be permanent.
- No specialty crop land should be lost either via redesignation to settlement within the Greenbelt or by removal from the Greenbelt boundaries.
- The Duffins Rouge Agricultural Land Preserve should remain protected within the Greenbelt and under the *Duffins Rouge Agricultural Land Preserve Act, 2005*.

Value of Farmland

Ontario's farmland is the foundation of the significant economic contributions of our overall agri-food sector which will continue to be important to a strong Ontario economy. Within the Greenbelt, protected farmland and natural features together ensure environmental benefits and corridors for wildlife and water through the landscape. Productive farmland is vital to our food security, here in Ontario and globally. All these benefits are lost when farmland is permanently removed from production.

Solutions for Housing

We do not need to use Greenbelt protected land to meet increased housing needs. While the need for increased housing supply is clear, *where* to build the houses must be carefully considered.

The CFFO has long recognized that land use planning is a challenging process. The Greenbelt was created to protect farmland and natural areas in regions of the province where we have the highest quality, most productive farmland and where growth pressure is significant.

As solutions to the need for housing, the CFFO recommends facilitating brownfield redevelopment, increasing density within settlement area boundaries, and prioritizing use of land currently designated for development without designating more farmland for future development.

Permanent Protection

The CFFO strongly supports the vision and goals of the Greenbelt, including that land should have permanent protection. This cannot occur in a Greenbelt that is constantly subject to land removals in one place and additions in another. Even if the total land area within the Greenbelt remains the same or increases, specific features in one place cannot be replaced elsewhere.

Permitting land to be removed from the Greenbelt clearly signals that the government is not committed to protecting farmland. This precedent will open a floodgate of requests for development within the current Greenbelt boundaries. This will increase land speculation within and around the Greenbelt, which will drive up the price of farmland.

Conclusion

Protection of land within the Greenbelt must be permanent. Greenbelt lands are not necessary to meet housing demands. The CFFO calls on the Ontario government to keep its promise and leave Greenbelt lands protected. We request that the government repeal its decision to remove land from the Greenbelt for development.

We thank you for your consideration of our concerns.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario