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LONG-TERM THINKING FOR TODAY'S ISSUES

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April 23, 2022

Provincial Land Use Plans Branch  
Ontario Ministry of Municipal Affairs and Housing  
College Park, 23<sup>rd</sup> Floor  
Suite 2304  
777 Bay Street,  
Toronto, ON M7A 2J3  
Via email: [GreenbeltConsultation@Ontario.ca](mailto:GreenbeltConsultation@Ontario.ca)

Re: ERO 019-4483 Proposed Amendment to the Greenbelt Area Boundary  
Regulation – Growing the Size of the Greenbelt and  
019-4485 Proposed Amendment to the Greenbelt Plan – Growing the Size of the  
Greenbelt and  
019-4803 Ideas for Adding More Urban River Valleys

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 supportive of the Key Principles for Expanding the Greenbelt used in determining and consulting on selected Urban River Valleys for addition into the Greenbelt Boundary. The CFFO does not object to inclusion of the 13 new Urban River Valleys proposed to be added through amendments to the Greenbelt Plan and the Greenbelt boundary regulation.

The CFFO is disappointed that agriculture sector concerns about the loss of productive farmland across the province raised in Phase 1 of the consultations have not been addressed with the current proposed expansion. Greenbelt policy protections, including fixed settlement boundaries, have proven to be effective at protecting farmland within the Greenbelt both from development and from speculative land purchasing. However, land outside the Greenbelt has seen increased development pressure. **We repeat our call for Greenbelt protections to be more broadly applied to agricultural lands. The CFFO requests that all prime agricultural areas across Ontario be added to the Greenbelt.**

### Principles for Growing the Greenbelt Expansions

The CFFO strongly supports principle 1 laid out in the consultation document. It is extremely important that no requests for removal of land or land exchanges are considered. Permanent protection of land, including farmland, within the Greenbelt can only be maintained when land within the Greenbelt stays within the Greenbelt.

The CFFO also strongly supports principles 2 and 3 relating to Greenbelt policies, objectives, vision and goals. It is vitally important that policies protecting land within the Greenbelt are not weakened, which might result in farmland loss or degradation of those policies that work to support viable agriculture within the Greenbelt area. The CFFO also strongly supports the goal of “permanent protection to the agricultural land base” as outlined in the Greenbelt objectives, vision and goals.

The CFFO supports principle 4, protecting the existing amendment process including broad public consultation. The CFFO continues to participate in government consultations on the Greenbelt, and we look forward to participating in any future consultations on expansion of the Greenbelt.

Principle 5, requiring that Greenbelt expansion “connects physically and/or functionally to the current Greenbelt,” is also an important concept. We recognize the importance of connectivity and that contiguous land parcels are more easily protected than isolated islands of either farmland or greenspace.

The CFFO strongly supports the Agriculture System model operating within both the Greenbelt Plan and A Place to Grow: Growth Plan for the Greater Golden Horseshoe. Mapping of prime agricultural land within these two regions takes connectivity of land into account. Edge effects, and pressures between the Greenbelt and surrounding areas outside the Greenbelt, also need to be carefully considered.

The CFFO has long recognized that land use planning is a challenging process that requires balancing the needs of many different competing interests within a finite landscape. Principle 6, which “considers impacts on existing provincial priorities” needs to weigh carefully in the balance the provincial priority to protect our valuable farmland and Agricultural System, especially in regions of the province where we have the highest quality, most productive farmland and where growth pressure is most significant.

## Broader Expansion of the Greenbelt

In Phase 1 of the consultations on “Growing the Size of the Greenbelt” the CFFO along with other organizations called for OMAFRA-defined prime agricultural areas to be added to the Greenbelt across the province.

The Ontario Ministry of Agriculture, Food and Rural Affairs has a clear definition of “prime agricultural areas” that is applied and mapped within the Greater Golden Horseshoe region and is also used as a designation in official plans across the province. This definition of prime agricultural areas acts as a reference to the most important areas where development should not occur. Unfortunately, productive agricultural land continues to be lost to development through Minister’s Zoning Orders, settlement area boundary expansions and new lot creation.

The CFFO recognizes the need for increased housing supply across the province and strongly encourages 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.

As a farm organization, we are concerned about the protection of productive agricultural land. There is significant prime agricultural land outside the current Greenbelt boundaries. This land is highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services.

Ontario's farmland is the foundation of the significant economic contributions of our overall agri-food sector. The agriculture and agri-food sector has proven to be resilient in economic downturns and agile in adjusting to significant changes and new opportunities. It will continue to be an important sector in helping to strengthen our Ontario economy far into the future – but only if our land base is protected.

The CFFO calls for stronger protections on this valuable farmland across the province. This means we need effective protections, like those within the Greenbelt, including fixed settlement area boundaries. Fixed settlement boundaries are effective at protecting farmland from development and from speculative buying pressure which inflates farmland value and impacts the economics of farming.

Ideally, such protections would be instituted across the province by strengthening farmland protection and solidifying urban boundaries through the Provincial Policy Statement, and in the GTA region through A Place to Grow: Growth Plan for the Greater Golden Horseshoe. However, with the government's current approach to land use policies outside the Greenbelt area, it is clear that Greenbelt protection would be the most effective protection on farmland.

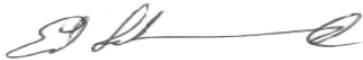
**For this reason, the CFFO requests that all OMAFRA-defined prime agricultural areas across the province be added to the Greenbelt.**

## Conclusion

The CFFO is disappointed that agriculture sector calls for expansion of Greenbelt protections on agricultural land from Phase 1 of the consultations have not been addressed in the current "Growing the Size of the Greenbelt" proposals. In the current context, Greenbelt protections are the best option for farmland protection across the province.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario