



LONG-TERM THINKING FOR TODAY'S ISSUES

April 16, 2021

Attention: Sean Fraser, Director
Provincial Planning Policy Branch
Ontario Ministry of Municipal Affairs and Housing
College Park, 13th Floor
777 Bay Street,
Toronto, ON M7A 2J3
Via email: GreenbeltConsultation@Ontario.ca; sean.fraser@ontario.ca

Re: ERO 019-3136 Consultation on Growing the Size of the Greenbelt

Dear Mr. Fraser,

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 loss of productive farmland across the province. The 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. Adding small parcels to the Greenbelt will simply increase this pressure elsewhere. Greenbelt protections need to be more broadly applied to be effective. Therefore, 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 participated in the stakeholder webinar hosted by MMAH in March as part of this consultation, and we look forward to participating in any future consultations on refinements or other outcomes from this consultation.

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 which requires balancing the needs of many different competing interests for a very 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.

Paris Galt Moraine Study Area

The proposed study area for the Paris Galt Moraine focuses primarily on protecting the moraine as a feature contributing to water quality in the region. However, there are several other policies in place to protect water. It is not clear that adding this moraine area into the Greenbelt will make any tangible difference to the level of protection on water.

While protecting water and natural features are among the goals of the Greenbelt, other goals, such as the protection of farmland, are clearly not behind the proposed study area under consideration. While the study area does include valuable farmland, significant surrounding productive farmland is outside the study area.

We know from current experience of the Greenbelt that farmland within the Greenbelt is well protected, but often at the cost of much higher risk to farmland outside the Greenbelt because of leapfrogging and development pressure being directed to these lands instead. Putting the proposed lands into the Greenbelt will only put significantly more pressure on surrounding productive farmland, and likely would be detrimental to farmland protection in the region overall.

As a result, the CFFO does not support inclusion of only the study area for the Paris Galt Moraine into the Greenbelt.

Broader Expansion of the Greenbelt

The current Greenbelt has proven to be effective at protecting farmland within its boundaries. Part of the reason for this success is that settlement boundaries outside the Greenbelt are not permitted to encroach within the Greenbelt. Settlements within the Greenbelt are highly limited in their ability to expand out onto protected countryside.

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 be an important sector in helping to rebuild our Ontario economy.

The CFFO would like to see 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 passing of Bill 257, *Supporting Broadband and Infrastructure Expansion Act, 2021*, which offers the ability, through the Minister's Zoning Order process, to circumvent all land use planning policies in the province except within the Greenbelt Area, it is clear that Greenbelt protection will be the only effective protection on farmland available.

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.

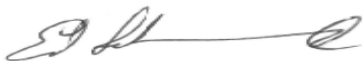
For this reason, the CFFO requests that all such defined prime agricultural areas across the province be added to the Greenbelt.

Conclusion

The CFFO is concerned about the loss of productive farmland across the province. Greater protections are needed. The Greenbelt policy protections, including fixed settlement boundaries, have proven to be effective at protecting farmland both from development and from speculative land purchasing. In the current context, Greenbelt protections are the best option for farmland protection across the province. Therefore, the CFFO requests that all prime agricultural areas across Ontario be added to the Greenbelt.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario