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May 28, 2015

Richard Stromberg  
Manager  
Ministry of Municipal Affairs and Housing  
Ontario Growth Secretariat  
777 Bay Street  
Toronto Ontario  
M5G 2E5

**Re - Coordinated Review - Growth Plan for the Greater Golden Horseshoe, the Greenbelt Plan, the Oak Ridges Moraine Conversation Plan and the Niagara Escarpment Plan**

**EBR Registry 012-3256**

The Christian Farmers Federation of Ontario (CFFO) is an accredited general farm organization operating in the province of Ontario, representing the interests of over 4,100 farm families in the province.

Farmland preservation throughout all four plans is the major goal of the CFFO. These farmlands are located within the most densely populated region of Canada. Yet they still provide an abundance of food, fuel, fiber, recreation and related services to the millions of Ontarians who live and work in and around this area. We very much support one of the key objectives of the greenbelt plan, which is to "protect against the loss and fragmentation of the agriculture land base and support agriculture as a predominant land use."

After ten years the evidence does not demonstrate that this objective is being met with the enthusiasm we had expected. The jury is still out; however, we have noticed that the development pressure and urban land speculation have been reduced. At the same time farming activity has declined. Major livestock farms have been disappearing; only horses and sheep are holding their own. It is still too early to measure this desirable objective. Perhaps another ten years will be required to determine if this approach to farmland protection is effective. Therefore:

**The CFFO does not support any expansion of the greenbelt into neighboring areas at this time.**

There is a concern expressed by some of our members that the greenbelt will turn into a playground for the wealthy. There is a trend for small parcels of land to be converted to estate lots with the farm land then being virtually abandoned, generating weed and pest pressures for neighbouring farms. In time, the wealthy home owner may very well want to restrict normal agriculture practices in that expanding urban shadow surrounding their home, thus defeating the purpose of the greenbelt. We suggest a serious review of the practice of severing surplus farm houses. Due to their proximity to Toronto, we expect these farm houses will be expanded and upgraded into very nice estate homes. CFFO has always opposed creating rural residential lots. It is poor planning and not in the best interest of agriculture in the long run. We see the practice as "short term gain with long term pain."

**The CFFO urge the review committee to consider both the short term and long term impact of surplus farm house severances.**

Natural heritage is a term often used when the plans are being discussed. We understand the term essentially to mean the natural environment that existed in Ontario before the European settlers arrived and started to alter that environment. All too often, changes made to their lands by farmers is now being considered natural heritage. Thus, managed woodlots, drainage ditches, windbreaks, etc. are now considered "natural heritage" and have special rules applied to them. Often these features are not natural and not heritage. These new rules frequently hamper farmers' efforts to operate their farms in the most profitable manner.

**The CFFO urge caution and due diligence needs to be taken when "natural heritage" designations are being made; land owners need to be properly informed of proposed changes and have a low cost, fair and effective appeal process.**

If protecting agriculture land continues to be a high priority and it is desirable for farms to be sustainable, then farming in these protected areas needs to be profitable. Viability and sustainability means profitability. When new regulations are being considered they should be looked at through the lens of farm sustainability. Farm profitability reduces the potential of the Greenbelt becoming a home and playground for urban citizens.

**The CFFO recommends that farming sustainability be emphasized and given a higher priority than is the currently practice.**



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The plans use different terminology and different approaches to administer the regulatory process. It defies logic to have similar government projects administered from different Ministries with different approaches.

**The CFFO recommends that all four plans be administered by one Ministry and that it be the Ministry of Municipal Affairs and Housing.**

There is a need for the citizens of Ontario to have access to desirable and affordable housing close to where they work. Sprawling onto farmland in the Greater Golden Horseshoe is not desirable from either a short term or long term planning standpoint. The Provincial Policy Statement and Planning Act outline appropriate development targets. Our organization supports these targets. Encouraging or forcing the lower tier communities to adhere to these planning guidelines would get our support. Preventing the Ontario Municipal Board from bending the rules would also be desirable.

**The CFFO recommends that density rules outlined in the Provincial Policy Statement be more closely enforced.**

Thank you for this opportunity to provide our comments.

Lorne Small, President  
Christian Farmers Federation of Ontario