



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

February 27, 2017.

Greenbelt Site Specific Review
Ministry of Municipal Affairs and Housing
Municipal Services Division,
Municipal Services Office – Central Ontario Region,
777 Bay Street,
Floor 13,
Toronto, ON
M5G 2E5

Dear Minister,

Re: EBR 012-9241 Proposed Amendments to the Greenbelt Plan—Greenbelt Area Mapping (Greenbelt Site Specific Review Environmental Registry Posting)

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario.

CFFO does not support changes to the Greenbelt boundaries that would remove land from Greenbelt protection. Part of the vision and goal of the Greenbelt Plan is to provide permanent protection to agricultural and natural heritage system lands within its boundaries. Allowing land to be removed jeopardizes this goal of permanent protection, and will subject the boundaries to constant petitions for changes and amendments in the long term.

Protecting our valuable Ontario farmland is an ongoing challenge for land use planning in the province. Long-term thinking on behalf of governments at all levels, from municipal, to county or regional and provincial, is required to ensure farmland is protected, but also that active farming remains socially, environmentally and economically viable on that farmland.

The Greenbelt Plan, introduced in 2005, is a vital part of the provincial government's efforts to protect areas of Ontario's most important productive farmland and sensitive natural heritage features which are under significant development pressure. As stated in the introduction, "the Greenbelt Plan identifies where urbanization should not occur in order to provide *permanent protection* to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape" (page 2, emphasis added).

In order to provide effective permanent protection, the government needs to stand firmly behind the vision and intention of the Greenbelt, and hold to the minimum Greenbelt boundaries set out. Removing land from the Greenbelt indicates that the protections of the Greenbelt are not permanent, and that interested stakeholders need only make stronger arguments to remove land from within its boundaries. This means the Greenbelt will be under constant attack for proposed boundary changes, which will undermine the goals of the Plan and erode farmland protection in these vulnerable areas.



Toll-Free:

519-837-1620

(1) 855-800-0306



www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

The CFFO sees great value in adding lands to the Greenbelt in order to extend the policy and land use protections as needed in the region to direct and curb urban expansion pressures. Additions to the Greenbelt should be carefully considered through predetermined criteria and suitable review before expanded boundaries are determined. Predetermined criteria for farmland protection should include at a minimum specialty crop land, and class 1-3 farmland or the best three classes of farmland in the area. Once land has been added to the Greenbelt, it should not again be put at risk of being removed.

It is insufficient to create a pattern whereby lands added are considered to compensate for lands removed. The function of natural heritage features cannot be exchanged one for another. Likewise, arable land is very limited in Ontario. Good farmland's quality food producing capacity cannot be replaced, and is too precious to allow it to be lost to development pressures. Protection within the Greenbelt needs to be permanent.

Land use planning also needs to keep pace with growth in Ontario. We are already seeing development pressures increase as space becomes limited and costs become higher within the greater Toronto area. Development is instead expanding in areas on the far side of the Greenbelt. This is putting even more high quality farmland at risk in the province.

CFFO encourages the government to hold firm to the minimum boundaries set out in the Greenbelt Plan, and to clearly indicate its ongoing support for permanent protection of this valuable and sensitive agricultural land base and these natural heritage features. CFFO supports adding more lands into Greenbelt protection which meet predetermined criteria and following suitable review. Once added, however, protection for this land needs to be permanent.

Thank you for this opportunity to provide our input.

Sincerely,

Clarence Nywening, President
Christian Farmers Federation of Ontario