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March 7, 2018.

Protecting Water Consultations  
Ministry of Municipal Affairs  
Local Government and Planning Policy Division  
Provincial Planning Policy Branch  
777 Bay St.  
Floor 13  
Toronto, ON  
M5G 2E5

Dear Minister,

### **EBR 013-1661: Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring**

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

The current proposal “Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring” takes the first steps of establishing criteria and proposes seven study areas to be considered for inclusion in a Greenbelt expansion in order to protect important water features that are under significant urban development pressure.

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).

The CFFO sees 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.

#### **Key Recommendations:**

- 1) That provincial Agricultural System mapping, including prime agricultural lands, be considered as, at minimum, a secondary criterion for prioritizing newly established Greenbelt boundaries based on the proposed study areas.

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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- 2) That consideration be given to existing farm businesses in any newly established Greenbelt boundaries.
- 3) That greater protection of farmland and important water features is needed through land use regulations in other areas of the province experiencing growth pressure beyond the Growth Plan area.

### **Criteria for Determining Additions to the Greenbelt**

1) *That provincial Agricultural System mapping, including prime agricultural lands, be considered as, at minimum, a secondary criterion for prioritizing newly established Greenbelt boundaries based on the proposed study areas.*

The CFFO recognizes that the main focus of this consultation is to establish priority areas for Greenbelt expansion that will protect important water features under significant urban development pressures. However, a significant part of the land within the established study areas is also productive agricultural land. Since the overall goal of the Greenbelt is to protect *both* agricultural land and ecological and hydrological features, the CFFO would like to see, at a minimum as a secondary criterion, the added value of protecting prime agricultural land (as defined by the already established provincial Agricultural Land Base mapping) as adding greater weight of priority to areas proposed for including in the Greenbelt expansion. This mapping should also be taken into consideration as more detailed proposed new boundaries are established.

Predetermined criteria for farmland protection should include, at a minimum, class 1-3 farmland or the best three classes of farmland in the area.

2) *That consideration be given to existing farm businesses in any newly established Greenbelt boundaries.*

The Greenbelt Plan recognizes that protecting agricultural land provides both food production and environmental benefits. Unlike many other forms of land use, there is greater opportunity for farming to coexist with appropriate protection of natural heritage and hydrologic resources.

At the same time, farmers need to be able to make a viable living from their land assets. It is vital that normal farm use be allowed and accommodated on farms within the Greenbelt boundaries. Where this is not possible, farmers should be appropriately compensated for the loss of use of their land for farming, and for the appropriate value of the environmental goods and services they are providing to the greater public through their land stewardship.



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### **Land Use Regulation Protections on Farmland Beyond the GGH**

*3) That greater protection of farmland and important water features is needed through land use regulations in other areas of the province experiencing growth pressure beyond the Growth Plan area.*

Land use planning 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 and the Growth Plan area. Development is instead expanding in areas on the far side of the Greenbelt and beyond the Growth Plan area. This is putting even more high-quality farmland at risk in the province.

We recommend that the protocols for establishing the agricultural land base mapping within the Growth Plan area be applied in other regions of the province experiencing growth pressure, such as in the London and surrounding area.

We appreciate this opportunity to respond to these proposed Greenbelt expansion study areas and thank you for your consideration of our comments.

Sincerely,

Clarence Nywening, President  
Christian Farmers Federation of Ontario  
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