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Hon. Doug Ford,

Premier of Ontario

Room 281

Legislative Building, Queen’s Park

Toronto, Ontario M7A 1A1

Hon. Steve Clark, MPP

Minister of Municipal Affairs and Housing

777 Bay Street, 17th Floor

Toronto, Ontario M5G 2E5

April 19, 2021

Premier Ford and Minister Clark,

Re: 234-2021-813, Growing the Greenbelt

ERO 019-3233, Proposed changes to MZO and the Planning Act

We are writing this letter in response to the proposed expansion of the Greenbelt. Our organization, the Golden Horseshoe Food and Farming Alliance, represents the agricultural and food sector in the part of Ontario that contains the majority of the current Greenbelt. As you are well aware, establishing the Greenbelt was not done easily and considerable care and concern should be exercised as you attempt to add lands to the Greenbelt. Thank you for the opportunity to make comment on the proposed changes.

Since the inception of the Greenbelt in 2005, the public has become very supportive of the idea of a Greenbelt. Over time, it has also been proven that the Greenbelt has been positive for the protection of agricultural lands and the natural heritage system. The certainty that the Greenbelt has given to the farming community has allowed for succession planning and the continuance of farming in the near-urban area. At the same time, there are still landowners that have found themselves on one side of the line drawn or the other and their fortunes have been vastly different.

As an organization, we must support the protection of agricultural land and not the speculation on lands for development.

Additionally, the Greenbelt has encouraged growth in burgeoning cities to grow upward and not outward, protecting fragile wetlands and source water. Directed growth also makes efficient use of transit infrastructure and other institutions and services that create complete communities.

As an Alliance, we support the addition of the lands on the Paris-Galt Moraine to the Greenbelt. The runaway development south of the City of Guelph shows how unchecked growth can exert pressure on landforms, wetlands and aquifers that should be protected.

The original underpinnings of the formation of the Greenbelt were to create an “agricultural preserve”. While the Greenbelt has evolved to become significantly more than a preserve for agriculture, it has also provided significant protection for wildlife habitat, source water, significant landforms and fragile ecosystems. In addition, the strong provincial regulatory framework has given all municipalities direction on how Greenbelt lands should be protected from development. We believe that one of the best ways to protect agricultural lands in Ontario would be to Greenbelt the whole province.

While we support expansion of the Greenbelt, we do however have some cautions with the process. Our concerns are as follows:

1. **There is inconsistent messaging from this government which leads to skepticism about the true intent of adding lands to the Greenbelt.**

There appears to be a significant disconnect and a struggle within this government between supporting sustainable growth and protecting the environment.

Adding lands to the Greenbelt is a “feel good” move for this government. The public is fully behind the move to do so.

At the same time, our concern is that with the recent posting of ERO 019-3233, your Ministry is proposing that Ministers Zoning Orders (MZO’s) would not need to be consistent with the Provincial Policy Statement. How does this government deem to protect Provincially significant features and agricultural land and at the same time use tools that would completely ignore its’ own Provincial Policy Statements? Good planning is the most powerful tool that we have to protect agricultural land.

MZO’s fly in the face of good planning and will lead to long-term disastrous results that will continue to haunt future municipality governance. Any move that precludes public consultation will further erode the role of the municipality and the trust of the public in an open and democratic process. The recent Duffins Creek example has shown exactly what can happen when proper planning is not followed at all levels.

There is a time and place for MZO’s to be used judiciously, especially in built up areas where there is need for additional long term care facilities or housing. They should be a tool of last resort in truly exceptional circumstances. We strongly suggest that MZO’s should not be ever be used on prime agricultural lands when developers are simply looking for a quicker way to build sprawling housing, gravel pits and even long-term care facilities and developments without public input. Agricultural lands are not lands that are “yet to be developed” with non-agricultural uses. We do not support the proposed Schedule 3 amendments of Bill 257.

1. **Lands added to the Greenbelt should be contiguous to the current Greenbelt lands.**

Gaps and holes left within the Greenbelt designed lands leads to landowner dissatisfaction and discontent. The new boundary should be mapped according to the significant landforms and not the property lines. The only gaps should occur in hamlets, towns and other built-up areas.

1. **Any lands added should not have the more restrictive policies of the Oak Ridges Moraine Act.**

Farming within the Oak Ridges Moraine is more difficult especially for livestock operations as increased setbacks are required. This can severely limit expansion on farms. The more restrictive policies are not found within the Greenbelt Plan. Lands in the proposed addition should follow the Greenbelt Plan and will therefore allow successful agricultural operations to grow and thrive and pass to succeeding generations.

**4. Firm urban boundaries are part of the move for the protection of agricultural and natural heritage features.**

Increasing density and firm urban boundaries should not be an elusive dream for municipalities. As a society we need to wake up to the fact that if there is no land left to grow the food, we become more dependent on other countries to supply our basic needs. Our recent experience with vaccine production has shown the consequences of having another country supply our needs. The best lands for agricultural production in Canada exist in Southern Ontario. If those lands are growing houses, our food will have to come from outside our borders.

**5. Consideration should be given to creating an ongoing process for additions to the Greenbelt lands.**

Are there other landforms, significant prime agricultural lands, natural heritage features and aquifers that need protection from our ever-growing desire for sprawl? Can they be identified and assessed for future inclusion in the Greenbelt? What process could be put in place to continue to add lands to the Greenbelt which has been shown to protect agricultural lands for future food production?

**6.** **Consultation during the addition of lands to the Greenbelt is essential.**

As most municipalities are in the process of completing their Municipal Comprehensive reviews in advance of the Official Plan updates, a significant amount of work has been done with LEAR studies and the Provincial Agricultural System and Natural Heritage System mapping. It will be important that this information and consultation on the local municipalities be used when updating the mapping to add lands.

In addition, consultation must be done with the farm community and landowners.

Thank you for the opportunity to comment. We support the addition of lands to the Greenbelt and hope that any additions will be done with due consideration of the concerns expressed above.

Regards,

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Janet Horner

Executive Director

Golden Horseshoe Food and

Farming Alliance

**About the Golden Horseshoe Food and Farming Alliance**

The Golden Horseshoe Food and Farming Alliance (GHFFA) The **Golden Horseshoe Food and Farming Alliance (GHFFA)** is a partnership between the regional municipalities and Federations of Agriculture in Niagara, Peel, Halton, York, and Durham, and the cities of Hamilton and Toronto, the Greenbelt Foundation, Durham College, Niagara College, Conservation Authorities, and the Ontario Ministry of Agriculture, Food and Rural Affairs. The Alliance seeks to identify pathways for a more integrated and coordinated approach to food and farming viability in the area to ensure that the Golden Horseshoe retains, enhances and expands its role as a leading food and farming cluster.