

April 9, 2021

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M7A 2J3

Sent via email to: minister.mah@ontario.ca and greenbeltconsultation@ontario.ca
and submitted online through the Environmental Registry of Ontario

Dear Minister Clark,

Re: ERO 019-3136 Consultation on growing the size of the Greenbelt

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

The Ministry of Municipal Affairs and Housing is seeking feedback on ways to grow the size and further enhance the quality of the Greenbelt, with a priority of:

1. A study area of lands focussed on the Paris Galt Moraine, which is home to critical groundwater resources
2. Ideas for adding, expanding and further protecting Urban River Valleys

OFA appreciates the opportunity to provide feedback on this proposal. We understand that the Greenbelt aims to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on the landscape. However, the current system is resulting in incremental loss of agricultural lands, based on an imbalance of prioritizing development and growth over farmland preservation. Regardless of the size of the Greenbelt

area, the areas excluded from the Greenbelt boundary are under intense development pressures, exacerbated by tools such as Ministerial Zoning Orders (MZOs). Tools to protect farmland such as the Agricultural System and Agricultural Impact Assessments are no match for the power of MZOs that prioritize development and circumvent agricultural and environmental protections.

OFA fully recognizes the value in protecting our water sources. Our families, our livestock, and our crops depend on readily available sources of clean water. However, OFA does not support this proposal to incrementally grow the Greenbelt in the proposed areas.

To mitigate the leapfrogging of development and intense development pressures, OFA believes that the Ontario government should designate all lands in Ontario that are outside of current urban boundaries as Greenbelt.

Incrementally Growing the Greenbelt

The proposal to expand the Greenbelt to the area of lands focussed on the Paris Galt Moraine does not align with the goals to protect the agricultural land base. Using Canada Land Inventory (CLI) mapping and Agricultural System data, only 46-66% of the Paris Galt Moraine would qualify as prime agricultural land, with a significant portion of that land classified as natural heritage features or other uses. A moraine is not composed of the highest quality agricultural land, but often abuts prime agricultural land. Adding only the Paris Galt Moraine and Urban River Valleys to the Greenbelt would put additional development pressure on abutting farmland outside of the boundary, resulting in an overall loss of prime agricultural farmland in Ontario.

It is unclear how the identification and future protection of the water features in the identified areas relate to the Natural Heritage System and Agricultural System for the A Place to Grow: Growth Plan for the Greater Golden Horseshoe. It is also unclear how the identification and future protection of the water features relates to existing source water protection plans. The proposal offers no evidence that normal farm practices negatively impact groundwater resources. If the proposed Greenbelt expansion moves forward, farmers within the proposed expansion areas must be assured that current and future agricultural activities will continue with no new restrictions, and that any associated modifications to existing Natural Heritage policies be clearly communicated.

To address these shortcomings, OFA recommends that this proposal to incrementally grow the Greenbelt be withdrawn. Drawing lines across Ontario's geography creates winners and losers on either side of the boundary. The province should take a holistic, systematic, province-wide approach that prioritizes protecting the best agricultural lands and identifies the most appropriate areas for growth, with justifiable criteria and a comprehensive analysis.

Stronger protection against development on agricultural land combined with fixed, permanent urban boundaries and mandatory compliance with urban density and intensification requirements would achieve water and farmland protection for future generations.

Protecting Agricultural Land

Before addressing the discussion questions, we emphasize that there is only one Ontario landscape, meaning that the full range of urban, rural, agricultural, natural heritage, cultural heritage and mineral extraction land uses found across the Greater Golden Horseshoe must coexist in the same space. Decisions on whether to grow the Greenbelt, or not, and if so, where that growth should occur, must recognize that our agricultural areas provide us not only with food, fibre and fuel, but also a broad range of environmental and ecological goods and services that

benefit all residents of the Greater Golden Horseshoe and beyond. These environmental and ecological goods and services include not only water cycling (i.e., flood mitigation, groundwater recharge, purification and retention), but also:

- aesthetic and recreational space,
- air quality (oxygen production, carbon sequestration, climate regulation),
- biodiversity,
- habitats for wildlife, including pollinators and endangered species,
- nutrient cycling, and
- soil erosion control.

The outer ring municipalities also face the additional provincial expectation that they will accommodate the substantial future population and job growth, and the infrastructure necessary to support them, flowing from the growth projections of the A Place to Grow: Growth Plan for the Greater Golden Horseshoe. Accommodating this growth, the majority of which will primarily consume agricultural lands, will place increased demands on the remaining non-urbanized land to fulfill all of society's expectations for the provision of the full range of environmental and ecological goods and services, freshwater amongst them, along with safe and affordable food, fibre and fuel.

The Greenbelt Plan

The Greenbelt Plan supports farmland preservation by ensuring that settlement area boundary expansions do not extend into the Greenbelt area. The Greenbelt Plan also supports agricultural lands by providing stronger protection from incompatible land uses than the Growth Plan or the Provincial Policy Statement. In addition, municipalities within the Greenbelt are required to follow the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas.

While we continue to advocate for the long-term protection of our agricultural lands for their ability to produce safe and affordable food, fibre and fuel, as well as for the protection of key natural heritage features, the Greenbelt Plan model does have its shortcomings. We support its permanent protection of prime agricultural lands and natural heritage features and areas, but oppose the additional land use restrictions, principally through its Natural Heritage Features and Areas Policies. We continue to oppose 30 metre setbacks from natural heritage features throughout the Greenbelt area on the basis that they lead to inefficient use of prime agricultural land, more so in specialty crop areas. The most recent version of the Greenbelt Plan did reduce this to 15 metres for specialty crop areas. Our ask to facilitate the extension of agriculture-related infrastructure (e.g., natural gas, three-phase power, broadband) throughout the agricultural areas of the Greenbelt was not adopted. The Co-ordinated Land Use Planning Review revisions to the Greenbelt Plan did not address OFA's concerns.

Distributing Economic Development

Distributing development across the province, rather than concentrating it in one area, is OFA's solution to the growing challenges that face both rural and urban communities. Investing in rural communities strengthens Ontario's agri-food sector. By supporting a strong domestic agri-food industry and investing in infrastructure that promotes economic development across the province, all Ontarians will have access to high quality, safe, local food.

Ontario farmers have a long history of practicing sustainable stewardship and protecting our ecosystems. Farmers conserve land and preserve soil, while growing safe and affordable food

for us all. Sound public policy to create economic opportunities must be paired with thoughtful land use policies that protect water and soil for future generations.

New investments in Ontario's rural communities will grow existing businesses, attract new companies, and boost opportunities for regional economic development. Distributing investment across the province will meet the needs of the agri-food sector and rural communities, while providing solutions to the challenges facing urban centres.

Funding formulas tend to favour urban areas; the higher costs of delivering equivalent services in rural areas are neither fully considered nor funded, and a variety of programs, such as public transit, support for universities and funding for major cultural facilities are only provided in urban areas. The result is a policy system that inherently advantages urban areas, contributing to slower economic growth in rural regions.

Distributing development investment across the province is the solution to the growing challenges that face rural and urban communities.

OFA emphasizes that distributed economic development does not mean we are advocating for unchecked development on our agricultural lands. We are against urban sprawl. Our call for distributed economic development comes with conditions.

The fundamental prerequisite is that agricultural land is given even stronger protection. Clear consequences must be in place so that rural communities respect hard urban boundaries. The brownfields and greyfields that are evident across communities must be used first for commercial, industrial, and even residential growth.

Our second condition is that our distributed economic development must be strategically and methodically planned. It cannot be a one-size-fits-all approach. We need to collectively work across economic development offices, with the business community and governments, to identify and pursue the best form of development for communities beyond the Growth Plan.

If the projected scale of growth continues in the Greater Golden Horseshoe, the Province should revise the A Place to Grow: Growth Plan for the Greater Golden Horseshoe to incorporate the following requirements:

- Fixed, permanent urban boundaries for all settlement areas throughout the Growth Plan area,
- Convert the urban intensification and greenfield development targets to mandatory requirements that are not open to appeal,
- Adopt a broader, province-wide policy to distribute urban growth more uniformly across Ontario urban areas with the capacity to accommodate growth; e.g., those with adequate development lands within their existing urban boundaries, serviced by municipal sewers, water, roads and transportation infrastructure, and
- Align the Natural Heritage System policies of the A Place to Grow: Growth Plan for the Greater Golden Horseshoe with those in the Provincial Policy Statement.

Discussion Questions

1. **What are your thoughts on the initial focus area of the Study Area of the Paris Galt Moraine?**

The proposal fails to justify why the Study Area of the Paris Galt Moraine is prioritized over other areas. Drawing lines across Ontario's geography creates winners and losers on either side of the boundary. OFA believes that the province should take a holistic, systematic, province-wide approach that prioritizes protecting the best agricultural lands and identifies the most appropriate areas for growth, with justifiable criteria and a comprehensive analysis.

For the purposes of protecting water, OFA has yet to see any evidence in the proposal or elsewhere that growing the size of the Greenbelt achieves this goal. At least eight Ontario statutes address water protection; the *Clean Water Act*, the *Conservation Authorities Act*, the *Environmental Protection Act*, the *Great Lakes Protection Act*, the *Lake Simcoe Protection Act*, the *Nutrient Management Act*, the *Oak Ridges Moraine Conservation Act*, and the *Ontario Water Resources Act*. Additionally, there are specific water-related policies in the Provincial Policy Statement, the Greenbelt Plan, the Growth Plan for the Greater Golden Horseshoe, the Oak Ridges Moraine Conservation Plan, and the Lake Simcoe Protection Plan, as well as Source Water Protection Plans. OFA sees no evidence that the existing legislation, regulation, plans and policies do not already provide excellent protection for Ontario's water resources.

As mentioned above, only 46-66% of the Paris Galt Moraine would qualify as prime agricultural land, with a significant portion of that land classified as natural heritage features or other uses. A moraine is not composed of the highest quality agricultural land, but often abuts prime agricultural land. Adding only the Paris Galt Moraine and Urban River Valleys to the Greenbelt would put additional development pressure on abutting farmland outside of the boundary, resulting in an overall loss of prime agricultural farmland in Ontario.

Without evidence or justification for this choice, OFA opposes the initial focus area of the Study Area of the Paris Galt Moraine. To mitigate the leapfrogging of development and intense development pressures, OFA believes that the Ontario government should designate all lands in Ontario that are outside of current urban boundaries as Greenbelt.

2. What are the considerations in moving from a Study Area to a more defined boundary of the Paris Galt Moraine?

As previously stated, drawing lines across Ontario's geography creates winners and losers on either side of the boundary. OFA believes that the province should take a holistic, systematic, province-wide approach that prioritizes protecting the best agricultural lands and identifies the most appropriate areas for growth, with justifiable criteria and a comprehensive analysis. There is no justification for identifying this area, so the boundaries are irrelevant.

3. What are your thoughts on the initial focus area of adding, expanding and further protecting Urban River Valleys?

OFA does not support adding, expanding and further protecting Urban River Valleys over other areas. The proposal does not substantiate how adding Urban River Valleys to the Greenbelt will further protect groundwater resources. Storm water management and sewage by-passes are not mentioned in this proposal, and how they might be connected to Urban River Valleys. This would provide greater benefit than expanding the Urban River Valley system. OFA is also opposed to increasing offsets from the water's edge, given that the *Greenbelt Act* confers 'permanent' protection.

Further, the addition of Urban River Valleys should not be considered as an increase of the total land area within the Greenbelt Plan. In our view, these lands do not contribute to the Greenbelt Plan's objectives, vision, and goals of providing permanent protection to the Agricultural Land Base. In no circumstance should 'greenbelting' the Urban River Valleys be considered an acceptable means of maintaining the Greenbelt's total land area in order to balance the loss of protected agricultural lands to development.

4. Do you have suggestions for other potential areas to grow the Greenbelt?

OFA did not support the Greenbelt at its creation in 2005. The Greenbelt failed to address the leapfrogging of development activity onto lands immediately beyond the Greenbelt and created winners and losers across boundary lines.

To address this issue, OFA believes that the Ontario government should designate *all* lands in Ontario that are outside of current urban boundaries as Greenbelt.

5. How should we balance or prioritize any potential Greenbelt expansion with the other provincial priorities?

While agriculture is identified as a provincial priority in the proposal, growth is disproportionately favoured under current government policies.

It is important to acknowledge that less than 5% of Ontario's land base can support any agricultural production. From 2011 to 2016, the Census of Agriculture indicated that Ontario lost 319,700 acres of Ontario farmland. That's 175 acres of farmland per day. If our province plans to continue to grow and prosper, we must also have a plan to protect our ability to produce food, fibre and fuel for the people of Ontario and beyond. The pattern of growth enabled by current provincial policies is unsustainable and needs to be resolved.

Irrespective of the size of the Greenbelt area, the areas excluded from the Greenbelt boundary are under intense development pressures, exacerbated by tools such as Ministerial Zoning Orders (MZOs). Tools to protect farmland such as the Agricultural System and Agricultural Impact Assessments are no match for the power of MZOs that prioritize development and circumvent agricultural and environmental protections. The current system is resulting in incremental loss of agricultural lands, based on the prioritization of development and growth over farmland preservation.

OFA believes that the Ontario government should designate all lands in Ontario that are outside of current urban boundaries as Greenbelt. The provincial government should also implement fixed, permanent urban boundaries and mandatory greenfield and intensification density requirements. These solutions will simultaneously address all provincial priorities outlined in the proposal: growth management, infrastructure, natural heritage and water resource systems, and agriculture.

With a clearer understanding of where development can and cannot occur, development that meets the requirements will be easily streamlined through, while those that do not meet the goals will not be open to interpretation or lengthy reviews and appeals. This will reduce red tape and attract economic investment. Agriculture and agri-food businesses will be able to invest in their operations and diversify their products with confidence that their land will remain a viable agricultural operation into the future.

6. Are there other priorities that should be considered?

OFA supports the provincial priorities highlighted in the proposal. However, the OFA believes that the Province has unfairly prioritized growth over other priorities. There are more effective ways to support agriculture, infrastructure, growth management, and natural heritage and water resource systems, while cutting red tape and promoting economic recovery and growth. We would love to discuss this further with you. Feel free to reach out to us.

As mentioned above, distributed economic development and investment in Ontario's rural and small communities enables agri-food businesses to continue to drive the economy forward, while reducing urban development pressures. Environmental stewardship is a key element of the distributed economic development strategy, ensuring smart growth and protection of resources essential for Ontarians' well-being, as well as the viability of farm and food businesses.


Agricultural Impact Assessments (AIAs) are a key tool for land use planning and economic development. OFA wholeheartedly supports the principle of using AIAs to mitigate the impacts of non-agricultural developments on neighbouring farm operations. OFA believes that AIAs are important to ensuring adverse impacts to the agri-food sector are avoided or minimized and looks forward to seeing province-wide implementation and widespread use of this key resource.

Economic Recovery and Growth

COVID-19 has had a massive impact on our provincial and national economy. While many sectors struggled and declined, agriculture and agri-food processing continued to be Ontario's key economic driver and essential businesses for food security and national prosperity. From field to fork, the agri-food sector contributes \$47.3 billion to Ontario's economy and supports over 860,000 jobs. The agri-food sector should be a key consideration for driving economic growth and recovery, while ensuring that our finite and shrinking agricultural land is not lost to development.

OFA appreciates the opportunity to provide our feedback on the consultation to grow the size of the Greenbelt. We look forward to discussing our proposed alternative solutions to support the Ontario government's provincial priorities and ensure our agri-food sector remains an economic powerhouse driving Ontario forward.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors