



November 16, 2022

The Honourable Steve Clark  
Ministry of Municipal Affairs and Housing  
Provincial Planning Policy Branch  
777 Bay St., 13th Floor  
Toronto, ON  
M5G 2E5

**RE: ERO Registry #019-6217 for input on Proposed amendments to the Greenbelt Area boundary regulation**

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated ecological lands through direct land securement, stewardship, policy research, and public education. Our goal is to ensure a safe and sustainable food supply for future generations in this province by protecting farmland in perpetuity.

With growing food insecurity in the province and the world, it is more important than ever before that we protect the finite and non-renewable resource that is our agricultural soil. Ontario's farmland directly supports the agri-food sector, which is the largest economic sector in the province, employing more than 860,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP<sup>1</sup>. In order to preserve the viability of Ontario's agri-food sector, it is crucial that the province's finite supply of agricultural land is protected.

In the past, OFT has commended the Province's commitment to the policies that strengthen agriculture in Ontario. We recognize the need to address issues of housing availability and affordability, however, OFT would like to encourage the Province to continue showing a strong commitment to Ontario's agri-food sector by making policy decisions that protect agricultural systems, agricultural land and food security and support the continued production of local food.

**The housing crisis facing Ontario is a real and wide-spread problem, however, OFT is concerned that the provincial policy changes in Bill 23 will not provide an effective solution. If this crisis is not addressed effectively, it will only exacerbate the other challenges Ontarians have to face, such as rising food insecurity, rising land prices, and the destruction of the agricultural system in Ontario.**

**OFT does not support the proposed amendments to the Greenbelt Area boundary.**

The Greenbelt is a unique piece of legislation that provides Ontarians with greenspace to enjoy and a guarantee of fresh, local food. The Greenbelt has helped connect people to the land and to the producers of their food. Residents from all over Ontario are fond of the Greenbelt and the legacy it provides. For farmers, it provides a certainty that their lands are protected which allows them to invest in their lands, planting cover crops to reduce erosion and help replenish the soil, and investing in infrastructure that will help them further their farm business. This certainty keeps farmers on the land, and contributes to the strength of our agri-food sector.



Even though the proposed changes to the Greenbelt boundary will result in a net increase to the overall area covered by the Greenbelt, OFT is concerned that most of the lands that are going to be added consist of urban river valleys, which already receive protection from land use planning and environmental policy. Meanwhile, much of the land that has been designated to be removed consists of farmland that does not receive these protections and that is vulnerable to development. The GGH is one of the fastest growing areas in the country, and the farmland that surrounds it faces some of the highest development pressures in the country as well<sup>2</sup>. This land is also some of the most fertile land in the province, with a significant amount of the province's prime agricultural land<sup>A</sup>. On it, food products are grown that cannot be grown elsewhere. Without the protections provided by the Greenbelt, it is almost certain that these lands would be lost to agriculture.

The Province's ambitious target to begin building on the former Greenbelt lands by 2025 means that all of the investments put into the land by the farmers will be lost forever. Many of these investments have been the result of farmers taking action to mitigate the effects of climate change on their personal properties. Loss of these lands for agriculture would directly impact the fight against climate change.

Allowing development to occur on lands protected by the Greenbelt would undoubtedly result in an increase in land speculators buying farmland within the Greenbelt for potential future development. If this move to remove land from the Greenbelt proceeds, it will signal that the protections provided by the Greenbelt may not be upheld. The speculation that results will reduce farmers' abilities to access farmland, discourage them from investing in the land, and ultimately jeopardizes the local agricultural system.

Municipalities in the GGH surrounding the Greenbelt have just put forward their updated official plans, which already designate over 14,000 hectares of land for development. This land provides ample space serviced by planned infrastructure, to build affordable homes that will meet the housing needs of Ontarians. It is worth noting that a significant amount of taxpayer dollars have already gone into the development of these plans. As such, the addition of more lands for development is not only unnecessary, but it will also require municipalities to spend more resources reviewing and updating their official plans and expanding infrastructure to areas for which it has not been planned.

This government has made repeated promises to "not touch the Greenbelt", which makes proposed changes to the Greenbelt boundaries even more startling and concerning.

**As OFT stated in our previous submission on ERO #019-3136 (Consultation on Growing the Size of the Greenbelt), we support growing the size of the Greenbelt, particularly if this means more of Ontario's finite supply of farmland is protected for future generations. However, it is important that the current Greenbelt areas remain protected, and that land is not removed from this plan.**

**Ontario needs an increased housing supply, but what is proposed in Bill 23 is not an effective solution.** Ontarians need affordable, high-density housing solutions that provide residents with easy, walkable, access to public transit and amenities<sup>3</sup>. New development built upon annexed farmland and natural areas are not an equitable solution to the housing crisis, and will only serve to magnify both the climate crisis and food insecurity.



Thank you for this opportunity to share our recommendations and feedback on ERO 019-6217. We sincerely hope you take our suggestions into consideration when reviewing the feedback you receive. If you have any questions or would like to speak further on these issues, please do not hesitate to get in touch. We look forward to continuing to work with the Province to strengthen the agricultural system and protect the viability of the agricultural sector.

Most Sincerely,

Martin Straath of  
Executive Director  
Ontario Farmland Trust

Bernard Pope  
Chair, Board of Directors  
Ontario Farmland Trust

Margaret Walton  
Chair, Policy and Education Committee  
Ontario Farmland Trust



References:

- [1] Ontario Federation of Agriculture. 2020. Agriculture Matters – A Guide for Municipal Councillors and Staff. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Ontario Federation of Agriculture & Environmental Defence. (2015). Farmland at risk: Why land-use planning needs improvements for a healthy agricultural future in the Greater Golden Horseshoe. <https://environmentaldefence.ca/report/report-farmland-at-risk/>
- [3] Jacobus, R. (2019). Inclusionary housing: Creating and maintaining equitable communities. *Lincoln Institute of Land Policy*. <https://www.jstor.org/stable/pdf/resrep22075.pdf>