



February 24, 2017

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

RE: Proposed Amendments to the Greenbelt Area boundary regulation (Greenbelt Site Specific Review Environmental Registry Posting) EBR Registry #012-9247.

Thank you for the opportunity to provide feedback on the proposed amendments to the Greenbelt Area boundary regulation. The Ontario Farmland Trust (OFT) is grateful to the Province, the Ministry of Municipal Affairs, and the Ministry of Housing for your commitment to an inclusive consultation process. These efforts will result in better policy outcomes and support collaborative planning within the Greater Golden Horseshoe.

OFT is concerned with the Province's approval of a handful of requests to remove land from the Greenbelt Area boundary. Although OFT acknowledges that careful consideration guided the Province in only approving a few minor amendment requests, OFT believes that further justification for the removal of 58 ha of land from the Protected Countryside must be provided. This action would ensure these adjustments do not set a precedent for the removal of farmland in future planning reviews.

OFT points to Section 5.7 of the Greenbelt Plan, 'amendments to the Plan shall not have the effect of reducing the total land area of the Greenbelt Plan'. OFT believes that the intent of the wording 'shall not have the effect of reducing the total land area...' is to not only maintain the total area of the plan, but also to not decrease the area protected under specific plan designations.

Although EBR Registry #012-9247 indicates that an additional 9,000 ha of land is being added to the Greenbelt Plan, and only 58 ha is being removed, these numbers do not take into account the differences between the land being removed from protection and those being added. The 9,000 ha example of land being added to the Greenbelt includes 21 river valleys and associated coastal wetlands designated under Urban River Valleys. The 58 ha of land being removed is within the Greenbelt's Protected Countryside and could be designated in the proposed Agricultural System, Natural System, or Settlement Areas. Therefore, although the Greenbelt Area boundary may have grown in size, it is possible there may be a loss of farmland under the Protected Countryside designations.

OFT recommends that the Province provide further justification for Greenbelt Area boundary amendments to clarify whether these removals conform to the intent of Section 5.7 of the Greenbelt Plan. Specifically, OFT recommends the following actions of the Province:

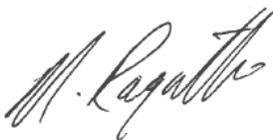
- **Increase Transparency by Providing Further Justification of Land Removals in Protected Countryside** – EBR Notice #012-9247 did not provide clear justifications for the site specific amendments to the Greenbelt Area boundary. For instance, without transparency in the Province’s decision making process it appears that the proposal to remove land in East Gwillimbury 511 & 641 Queensville Sideroad East does not conform to the intent of the Province’s boundary adjustment criteria. This site is agricultural land that is outside an urban area, has similar agricultural qualities to adjacent Greenbelt lands south of the property, and according to the February 9, 2017 York Region report on Greenbelt Boundary Changes there is no development application proposed or approved for the site. Although OFT understands that the feature on this site is already protected by the Lake Simcoe Protection Plan, the Province must make this reasoning clear within its EBR Notice. OFT seeks further clarification and transparency on the Province’s criteria and justification for the removal of agriculture lands from the Greenbelt.
- **Do Not Reduce the Total Area of Agriculture within the Greenbelt’s Protected Countryside** - OFT believes the intent of Section 5.7 of the Greenbelt is to not only maintain the total area of the plan, but also not decrease the area protected under specific plan designations. OFT recommends the Province protects farmland by not decreasing the total area of agricultural land within the Protected Countryside.

OFT applauds the decision of the Province to deny the site specific requests to Greenbelt Boundary changes that do not conform to the approach outlined in EBR Registry #012-9247. Specifically, OFT supports the following actions of the Province:

- **Rejection of Amendments in Specialty Crop Lands** - The rejection of requested boundary amendments within Specialty Crop lands is consistent with the Province’s strong commitment to protecting a scarce and irreplaceable resource. These decisions ensure these lands are strategically protected to benefit all Ontarians.
- **Rejection of Most Amendments to the Oak Ridges Moraine Conservation Plan** - The Province has appropriately recognized the important role of the Oak Ridges Moraine in maintaining ecological and hydrological health when it rejected these proposed amendments to the land use plan’s boundaries.

Thank you again for the opportunity to share our recommendations and feedback on the proposed amendments to the Greenbelt area boundary. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further to strengthen the protection of agricultural land resources and provide a secure future for our vibrant farming communities in the Greater Golden Horseshoe.

Most Sincerely,



Norman Ragetlie, Chair