



Golden Horseshoe
Food and Farming
Alliance

November 24, 2022

To: Environmental Registry of Ontario
RE: MORE HOMES BUILT FASTER ACT, 2022
ERO # 019-6141, 6160, 6162, 6163, 6177, 6197, 6196, 6172, 2927

Thank you for the opportunity to make comment on the More Homes Built Faster Act 2022. We support the government for proposed action to “fast track” badly needed housing for the residents of Ontario.

The Golden Horseshoe Food and Farming Alliance (GHFFA) is a partnership between Regional Municipalities and the Cities of Toronto and Hamilton, the farm community and organizations in the Golden Horseshoe that seek to grow and enhance the food and farming cluster of the region. The Alliance is responsible for the implementation of the **Golden Horseshoe Food and Farming Action Plan 2026** which identifies pathways for a more integrated and coordinated approach to food and farming in one of North America’s most significant food clusters.

Given the scope of this bill, it is impossible for us to comment meaningfully on all sections, but we will provide our suggestions to areas of the bill that most significantly affect the food and farming cluster of the Golden Horseshoe. Our organization has been involved in land use issues in the Golden Horseshoe since the 1990’s and have closely monitored, through our partnership, the growth in the region. We are not new to these issues.

Significant changes are proposed for the Conservation Authorities. Over time, the agricultural community have experienced “administrative creep” by some Conservation Authorities who chose to view any agricultural activity as a negative environmental impact, ignoring the farmers efforts for stewardship practices, carbon sequestration and efforts to protect watercourses and wetlands as a shared landscape. Agricultural lands work hand in hand with natural areas for important ecosystem services like pollination, flood prevention, erosion prevention, carbon sequestration, and more. The Credit Valley Conservation Authority has demonstrated excellence in their efforts, programming and positive work relationships they have developed with the farming community to ensure healthy biodiversity, clean water and conservation. The same cannot be said for many other Conservation Authorities in the Golden Horseshoe and beyond.

We are confident that the Great Lakes Protection Act - an international piece of legislation will provide the overarching guidance for cover off questions and concerns regarding waterways and sensitive lands.

Respectfully, changes to the Conservation Authority Act appear to encourage development on natural heritage features (such as wetlands), hazards (such as floodplains) and previously conserved lands. Allowing such development is a step backwards and will lead to long-term negative results. Municipalities should prioritize increasing density first and avoid development on these significant landforms and waterways.

Source water protection, previously coordinated by the Conservation Authority, should remain a fundamental value of the Conservation Authority and not an “added service” that requires additional funding from municipalities. Clean water is a community benefit and a human right.

Two mechanisms have been important for the protection of agricultural lands in the fastest growing part of the province. The first being the Greenbelt designation and the second being the Agricultural Systems mapping. While the agricultural community were reluctant to accept the Greenbelt designation of their lands in 2005, the most significant effect for agriculture has been the belief, developed over time, that the Greenbelt designation would hold firm and long-term planning and investment could be made by farmers within the Greenbelt.

We understand that the Greenbelt boundaries have been adjusted in seventeen minor ways since its’ inception, but the proposed removal of 7,400 ha of lands from the Greenbelt is not minor. This move has already shattered the certainty of the Greenbelt boundaries and will lead to the movement of the next generation of farmers from the Golden Horseshoe and further from potential markets and processing facilities. The removal of the Duffins Rouge Agricultural Preserve from the Greenbelt is of particular concern to the GHFFA.

The Golden Horseshoe Food and Farming Alliance recommends that the entire province be placed in a Greenbelt and Agricultural Systems mapping applied. This will serve to better protect the scarce, high quality agricultural lands that we have left in Southern Ontario.

Finally, our organization exists to share “best practices” in land use planning related to agriculture and food processing in the Golden Horseshoe. We can provide this government the solutions to the fine balance between the dual priorities of building housing and the protection of agricultural land.

We believe that Bill 23 seeks to reduce red tape and the many administrative barriers that currently exist to prevent housing to be built in a timely manner. Frivolous objectives and NIMBYism will certainly be reduced but we must not lose sight of the

essential guardrails that must be put in place to ensure that this province has a variety of housing, built in the right places, affordable infrastructure. Above all, any legislation must protect scarce agricultural lands and natural features for future generations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Witteveen', with a long horizontal flourish extending to the right.

Albert Witteveen
Chair
Golden Horseshoe Food and Farming Alliance
Niagara Regional Councillor

Cc. Steven Clark, Minister, Municipal Affairs and Housing
Lisa Thompson, Minister, Ministry of Agriculture, Food and Rural Affairs
Graydon Smith, Minister of Natural Resources and Forestry