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## **NFU-O Submission on *Protecting water for future generations: Growing the Greenbelt in the outer ring***

The NFU-O supports, in principle, expanding the Greenbelt to protect water for drinking and agricultural purposes, ecosystem health and climate change mitigation. One member succinctly notes, “Given the speed and scale of urban expansion, it would be wise to consider protection of the remaining wetlands and forests in the Great Lakes regions now, before they are developed, because eventually we will wish we had protected them and it will be too late. I observed at Spratts Point on Georgian Bay the last parcel of wetland was drained, logged and sold for luxury mansions. This is representative of what is going on throughout southern Ontario. It is time to protect what remains, because at this rate, there soon won't be much.”

### **1. Are there additional “building block” features that should also be considered for addition to the Greenbelt to protect water?**

As submitted by the Oak Ridges Moraine Partnership, we agree that key “building blocks” are omitted. These include:

- **Missing moraines and other glacial features**, including the Grand Valley area, the Orangeville Moraine, and the area between Waterloo and Elora/Fergus, the southeast of Brant County, and Escarpment area moraines.
- **Missing Coldwater Streams and Wetlands**, including the Grand Valley in Dufferin County and neighbouring Wellington County (with Luther Marsh), the area between Waterloo and Elora/Fergus, coldwater streams and wetlands west of Brantford (including Whiteman’s Creek), Clearview area, and a number of provincially significant wetlands (PSWs) and areas of natural significance (ANSI).
- **Permeability of moraines**: Here again, the province left out moraines of lower permeability. With so many communities dependent upon groundwater and facing development pressure, it is crucial that we include all moraines.
- **Overlapping building blocks**: The province excluded areas that did not have overlapping groundwater and surface water features. These building blocks should be considered separately (for example, the loss of wetlands in the Greater Golden Horseshoe (GGH)).

#### **Additional Building Blocks:**

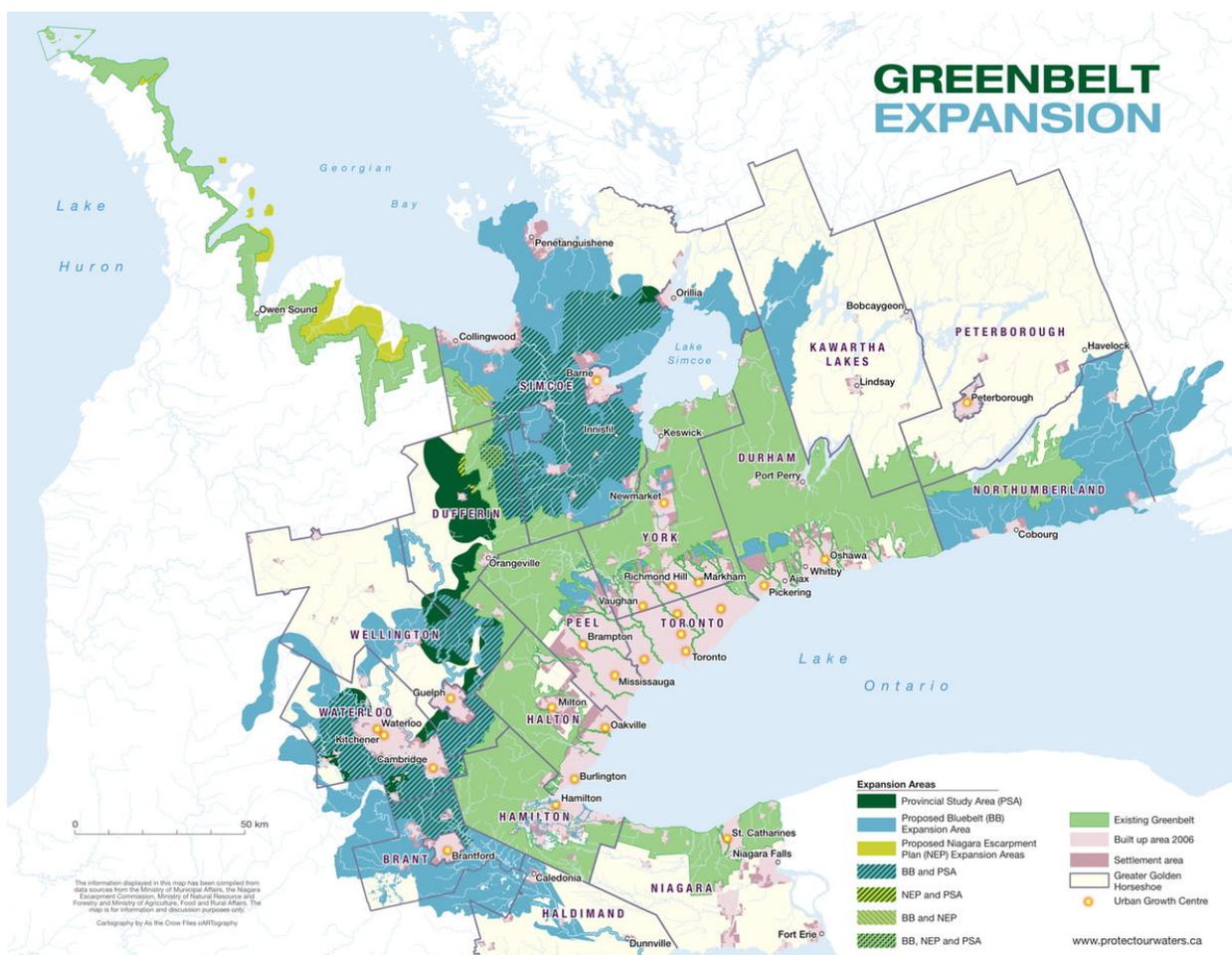
The NFU-O recommends that the following areas be included as building blocks in determining the study area:

**A) Headwaters:** The eastern part of Brant County was excluded from the Study Area, despite the fact that headwaters play a key role in this watershed. These headwaters are at high risk of being tiled, drained, channeled, relocated, or buried.

**B) Former Glacial Lake Shorelines and Plain:** Lakes Algonquin and Iroquois - west of Orillia and Barrie and in Durham Region; Lake Iroquois Plain in the eastern part of the GGH

**C) the Lake Simcoe Watershed and the Grand River Watershed in the GGH**

**D) Source Water Protection Plan Areas -** Greenbelt expansion would address key gaps in water protection policies by complimenting Source Water Protection (SWP). The Greenbelt policies would provide added protection of rural water “by maintaining groundwater volumes and quality for private wells, agriculture and ecosystem health.” The Greenbelt Plan would help to protect key hydrologic areas (section 3.2.4.1) and impose more limits to growth reducing threats to drinking water quality.<sup>1</sup> These are key protections for our farming communities.



Bluebelt Map showing hatched area for Provincial Greenbelt Expansion Study Area and solid blue for areas left out. Over 120 organizations support inclusion of these blue areas in the Greenbelt.<sup>2</sup>

<sup>1</sup> ORM submission, p. 24

<sup>2</sup> Map produced by Sierra Club, 2018. <https://www.sierraclub.ca/en/greenbelt-growth-action-alert?wssl=1>

## **2. Are there additional data sets or types of analysis that should be considered?**

The NFU-O recommends that the province consult and include analysis from the following:

- **Indigenous Traditional Knowledge and Knowledge Systems** - The province has a legal “duty to consult” First Nations peoples, therefore, they must carry out meaningful consultations regarding expanding the Greenbelt.
- **Regional Groundwater Modelling** - This is underway for parts of the western/southwestern GGH.
- **Oak Ridges Moraine Groundwater Program with mapping and data** on Simcoe County, Northumberland County and the inner ring of the GGH.
- **Source Water Protection Characterization Studies** - check to see if there is other data to provide insight on the Greenbelt Expansion Study.
- **Source Protection Information Atlas**
- **Conservation Authority Data**
- **Municipal Data**
- **Agricultural and Heritage System data**

## **3. Of the seven areas, are there some that are more or less important?**

We do not recommend prioritizing one area over another in the Study Area. Each community requires a healthy ecosystem to flourish and faces different threats to its water. It is only fair to include all of the building blocks in the Study Area.

## **4. Are there areas beyond the study area that you think should be considered for potential future Greenbelt expansion?**

In 2016, the NFU-O called for all farmland in Southern Ontario be temporarily greenbelted so that the proper studies can be done to identify class 1, 2 and 3 farmlands, significant wetlands and other topographical/geological features which could be of future benefit to society after which appropriate lands could be made available for development.

The farming communities of our members in Brant, Simcoe, Waterloo and Wellington within the GGH are particularly vulnerable to development pressure and land speculation and should be a priority for inclusion in the Greenbelt.

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**5. Should the province consider adding rivers that flow through urban areas as Urban River Valleys in the Greenbelt?**

Entire rivers, not just the urban sections, should be included.

**6. With the range of settlement areas in the GGH, how should the province balance accommodating future urban growth with protecting water resources?**

Prioritize the protection of water over urban expansion.

**7. What are other key considerations for drawing a potential Greenbelt boundary around settlement areas?**

- “(F)ew if any rivers or streams in the western/southwestern GGH have the capacity to accept further sewage effluent” without expensive updates to their treatment systems. Sewer pipelines have been considered for Simcoe County and the Grand River basin. It is crucial that we study the ability of water courses and bodies to recover from the increased stress of more sewage on the ecosystem.
- Assess the state of all aquifers, including the effects and implications of water-taking and water treatment infrastructure.

**8. How should the province determine which settlement areas become Towns/Villages or Hamlets if included in a potential Greenbelt?**

To protect rural water, small/rural settlement areas should be Hamlets. Any larger settlement areas with municipal sewage and water infrastructure should be Towns/Villages. Key water features should be added to the expanded Greenbelt Natural Heritage System.

**9. Once the Agricultural and Natural Heritage System under the Growth Plan are finalized, how should they be considered as part of potential Greenbelt expansion?**

Fully adopt the Bluebelt plan as mapped out above and the Natural Heritage and Agricultural Systems which will provide more extensive protection of water resources and farmland in Brant, Haldimand, Wellington, Simcoe, and Northumberland Counties. These areas have little coverage in the regional NHS yet are vulnerable to growth pressure.

**10. How should other provincial priorities or initiatives, such as mineral aggregates and infrastructure, be reflected in potential Greenbelt expansion?**

The Greenbelt Plan should be revised to allow, and even encourage, municipalities to create mineral aggregate extraction policies that are more restrictive, including no extraction below the water table. Once aggregates are removed from beneath prime agricultural land, full rehabilitation is impossible. The good drainage of ‘gravel-bottom’ land is what makes the land

so valuable as farmland, especially for higher value crops. Farmland must be prioritized over aggregates. The ongoing loss of prime farmland will be devastating for local food systems and our ability to feed the people of Ontario now and in the future. Our members noted: “Urban development creates a lot of pressure on maintaining usable agricultural land, through conversion to housing, gravel pits, and other uses. All classes of farmland should be considered valuable when considering their removal and conversion to other irreversible land uses.”

In consultation with our members, several noted that protecting farmland close to cities and urban areas is of benefit to urban dwellers who rely on farmers to feed them. One noted, “Urban sprawl is occurring rapidly in my region (on the fringes of London, Ontario). Every year we are seeing housing developments displacing agriculture. Although we are fortunate in Canada to have an excess of land, I feel that agricultural land in close proximity to urban centers can play an important role in creating a stable supply of food and should be prioritized and protected,” and another said, “Farmland must be preserved and our water resources must be protected. Food and water are our two most important needs. Urban growth is secondary to these two factors.”

#### **11. What other priorities or initiatives do you think the province should consider?**

While this consultation focuses on the province’s approach to the study area and water protection, we would be remiss if we did not bring up the bigger picture concerns of our members.

- **Speculative and non-farm ownership of farmland** - In our national report entitled *Losing our Grip: How Corporate Farmland Buy-up, Rising Farm Debt, and Agribusiness Financing of Inputs Threaten Family Farms*, the NFU called attention to the trend of speculative and non-farm ownership of farmland and its potential threat to future food sovereignty. The NFU advocates for keeping farmland available for food production with farmers as the responsible stewards of that land. NFU-O members who wish to continue farming and to have land that is available for future generations, and their allies (rural and urban eaters) in Brant County have produced a photo-essay<sup>3</sup> to tell their story. It includes a primer<sup>4</sup> on the Greenbelt expansion. It addresses the threat of land speculation and urban sprawl on farmland. Our members also commented:
  - “The only way to replace retiring farmers is through creating opportunities for new farmers to purchase land/access land tenure. This will be done by bringing land prices to a reasonable place and making farmland unattractive for real estate speculation.”
  - “Speculation is a detriment to all of us. Farmland has appreciated at an average of 6% over the last 25 years. This outpaces residential land appreciation in

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<sup>3</sup> Better Growth in Brant, 2018, <https://medium.com/@betterbrant/a-watershed-moment-choosing-better-growth-for-ontario-fda1947a452c>

<sup>4</sup> Better Growth in Brant, 2018, <https://medium.com/@betterbrant/https-medium-com-betterbrant-greenbeltprimer-7aeb3ef088>

Ontario. Retiring farmers will be secure in the equity they have built in their properties through steady growth. Any further speculation is unnecessary.”

- “We will need to encourage governments to provide programs which allow new land stewards (new farmers) to purchase land from retired farmers. We do need to avoid the purchasing of farmland by the wealthy to build up mega-mansions - as has been identified as an issue in the great Vancouver area.”
  - “I am a grower and constantly get bid out of Greenbelt property sales to developers who let the land sit vacant or rent to sod farms. This is not the purpose of the Greenbelt.”
- **Perception of Red Tape:** Regardless of the fact that a “full range of existing and new agricultural, agriculture-related and on-farm diversified uses and normal farm practices are permitted within and outside of the Greenbelt” and that “Municipalities are not allowed to adopt policies that restrict these permitted uses. Municipalities remain as the planning authority within the Greenbelt,”<sup>5</sup> several members noted that they feel they are subjected to more permits, forms, requirements, and penalties than farmers outside the Greenbelt. A member noted, “My farms are in the existing Greenbelt. The municipality makes it next to impossible to get building permits for new farm related buildings.” The NFU-O acknowledges that the province has made strides in working with municipalities to reduce red tape to farmers, and we encourage the ongoing relationship in order to ensure that the Greenbelt does not cause, nor is it perceived to cause, additional red tape. At its core, the Greenbelt must continue to allow farmers to carry out and expand their farm operations.

Farmers already struggle with the effects of climate change. Weather patterns are changing making it difficult to cope with flash floods, droughts, hail storms during the summer, and microbursts. The expansion of the Greenbelt will help mitigate climate change and reduce carbon emissions by reducing sprawl. We support the expansion of the Greenbelt to protect important water resources, natural heritage, and farmland. But we must be mindful of what one member commented: “While the Greenbelt offers many fine temporary solutions, by excluding the rest of the province, Ontario is simply deflecting the sprawl behaviour elsewhere! We must recognize that land and water are finite resources, and that they support life, not corporate wealth.”

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<sup>5</sup> Fact Sheet, Ontario Greenbelt Foundation, Feb. 2018