**THE PRESERVATION OF AGRICULTURAL LANDS SOCIETY**

**Working to Protect the Best Farmlands in Canada since 1976**

Comments re: Proposed amendments to the Greenbelt Plan (ERO 019-6216), Greenbelt Area boundary regulation (ERO 019-6217), and Oak Ridges Moraine Conservation Plan (ERO 019-6218).

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The proposed revision of Greenbelt Boundaries, if implemented by the provincial government, would destroy the Greenbelt as a meaningful tool for good land use planning in Ontario. This is because it would violate two important principles that have made the Greenbelt since it was established in 2005, a good land use planning instrument.

One aspect of the Greenbelt as a good land use planning tool relates to the large area of Class One Agricultural land it protects. These Class One Lands for good general agricultural crops, are much better than other such lands in Canada because of their high heat units. The other is that it protects small but precious areas of speciality crop lands. These are located in the Niagara Fruit Belt and the Holland Marsh.

Regarding the Class One to Three Agricultural lands protected by the Greenbelt (these lands are predominately Class One), the basic protection of the Greenbelt is that having an urban boundary expansion here is more difficult than in other prime agricultural lands in Ontario. In the rest of the province such expansions, (unless deemed minor), can take place every five years. They are regulated through the Growth Plan's requirement which prohibits urban expansions unless undertaken in the context of a periodic five year update of a municipal official plan.

For Prime Agricultural Lands, the difference between the Greenbelt and other areas of the province is that urban boundaries are frozen for ten years, instead of five. In 2017 there was, as mandated by the Greenbelt Plan, a review of these boundaries. Some minor expansions were permitted through this review on Class One lands as a result. However, after extensive public consultation, the boundaries were in essence reaffirmed.

If the Greenbelt Plan is to be remain an effective land use planning tool, any expansion of urban boundaries should wait another five years. It should be done as the previous review was carried out, as part of a co-ordinated review of provincial plans. Oddly, the largest area of prime land where an urban boundary expansion is proposed is adjacent to Duffin's Creek, which would if approved, result in storm water pollution for this cold water stream, which supports Brook Trout. This would undermine a key goal of the Rouge National Park.

Regarding Specialty Crop lands two urban boundary expansions are on unique tender fruit land in the Town of Grimsby. If approved they would be in violation of the principle of the permanent protection of designated speciality crop lands, a component of the Greenbelt Plan, authorized through the provisions of the Greenbelt Act. They provide most of the land in Canada where foods from for several tree fruit crops that are valuable for human health i.e. cherries, peaches, apricots, pears and plums are grown. This tender fruit growing has been historically concentrated in Niagara, since it has been demonstrated overtime, that cultivation in other areas, even in the small fruit belt in Essex County around the village of Harrow, are prone to higher rates of injury from cold temperatures and frost. And, while in theory it might be possible to expand grape production for food purposes such as table grapes and juices to other lands, this is unlikely since the Canadian grape industry is concentrated in Niagara.

In conclusion, the Greenbelt boundaries should be closed till the next 10 year plan review, and the principle of the permanence of the protection of Speciality Crop Land reaffirmed.