



October 28, 2016

Cindy Tan
Manager
Ministry of Municipal Affairs and Housing
Ontario Growth Secretariat
777 Bay Street
Toronto, Ontario M5G 2E5

Dear Ms. Tan,

*Re: EBR Registry Number 012-7194 - Proposed Growth Plan for the Greater Golden Horseshoe, 2016
EBR Registry Number 012-7195 - Proposed Greenbelt Plan, 2016
EBR Registry Number 012-7197 - Proposed Oak Ridges Moraine Conservation Plan, 2016
(part of the Coordinated Land Use Planning Review)*

The Beef Farmers of Ontario (BFO) appreciates the opportunity to provide comments on the proposed amendments to the Growth Plan for the Greater Golden Horseshoe (GGH), the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan. BFO represents the 19,000 beef producers across Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development. The proposed policies in the Growth Plan for the GGH, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan would potentially affect the approximately 6,000 beef producers who live within the areas covered by these plans.

Census data shows that Ontario lost 636,000 acres of farmland in the 5-year span from 2006 to 2011, with pastureland lost at a much higher rate than other farmland. These are unsustainable losses, particularly when viewed in the context of the economic contributions of Ontario's agri-food sector and the anticipated population growth in Ontario and globally. Added priority needs to be placed on the protection of farmland in order to maintain sufficient capacity to produce food for the growing population. The current levels of agricultural production, economic activity and employment cannot be maintained if the land base they depend on continues to be lost to non-agricultural uses.

BFO has serious concerns with the loss of farmland, most notably pastureland, and believes that the Provincial Policy Statement (PPS) definition of prime agricultural areas should be expanded to include Class 1-4 land, as well as Class 5 and 6 land where part of an existing agricultural operation. This is particularly important for agricultural uses that do not depend on Class 1-3 land alone, such as beef production. The preservation of agricultural land, including land that is suitable for pasture but is not Class 1-3, is imperative to the sustainability of Ontario's beef industry.

Although the definition of prime agricultural land is established in the PPS, it is our view that the land



use plans in the Coordinated Land Use Planning Review should include protections from non-agricultural uses on Class 5 and 6 land, which is land suitable and necessary for beef production and other agricultural uses that offer economic opportunities. Policies that actively deter economically viable agricultural uses, agriculture-related uses, agri-tourism uses and on-farm diversified uses have no place in the Growth Plan for the GGH, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan, and policies that hinder farm business viability and farmers' ability to fully use their land for agricultural uses are unacceptable. On the other hand, policies that promote compact urban development through higher densities are welcomed. The four land use plans in the Coordinated Land Use Planning Review must continue striving for a better balance between protection of farmland and non-agricultural development.

Regarding specific aspects of the proposed plans, BFO has the following comments:

Agricultural System, Agricultural Support Network and Agricultural Impact Assessments

BFO is encouraged by the proposed agricultural system concept in the Growth Plan for the GGH and the Greenbelt Plan. Identifying and including the agricultural support network in the agricultural system is a positive step in acknowledging the large amount of land that, though perhaps not prime agricultural land, is integral to Ontario's agriculture industry and rural communities. As stated earlier, BFO believes that there is a large amount of land used in agriculture that is not designated as prime agricultural, but that deserves a level of protection from non-agricultural uses nonetheless. Pastureland, sales barns, feed mills, grain elevators and abattoirs are just a few examples of how land that may not be designated as prime agricultural can have a critically important role in agriculture. The entire agricultural system, including the agricultural support network, deserves policies that encourage and support economically viable agricultural uses over non-agricultural uses.

BFO does, however, have some concerns regarding the "soft language" used regarding the agricultural system and agricultural support network. Rather than requiring that municipalities "implement strategies and other approaches to sustain and enhance the agricultural system", municipalities are simply encouraged to do so. This isn't sufficient. Past practice strongly indicates that unless compliance is mandatory, compliance will not occur. BFO recommends that implementation of policy 4.2.6.6 in the Growth Plan for the GGH and 3.1.5 in the Greenbelt Plan be made mandatory.

BFO also sees the use of agricultural impact assessments in the Growth Plan for the GGH and the Greenbelt Plan as a positive development. However, an agricultural impact assessment of potential negative impacts on agriculture should be mandatory on rural lands when non-agricultural uses are being proposed, and not only on prime agricultural lands.

Growth Plan for the Greater Golden Horseshoe

An increase of intensification targets from 40% to 60% within urban growth centers and an increase in greenfield density targets from 50 to 80 persons and jobs per hectare are both welcome changes. Ideally, higher greenfield densities should lessen the demand to convert agricultural lands to non-agricultural uses.

The policies for rural areas (section 2.2.9) seem to assume no agricultural activities are occurring in these areas. Despite not being classified as prime agricultural land, these areas nevertheless contribute a great deal to Ontario's overall agricultural production and are, in fact, critical to Ontario's beef industry. Class 4, 5 and 6 lands, typically designated as rural instead of prime agricultural, are extremely



valuable as pastureland, among other things. To ignore their contribution to Ontario's overall agriculture industry is an unacceptable oversight, and BFO recommends that the policies for rural areas be amended to accommodate agricultural activities.

Proposed policies in section 4.2.4 of the Growth Plan for the GGH, for lands adjacent to key natural heritage features and key hydrologic features, seem even more restrictive than the parallel policies in the Greenbelt Plan. BFO questions why these GGH policies are proposed to be stronger than the policies for the Greenbelt, let alone stronger than the province-wide policies set out in the 2014 PPS for key natural heritage and hydrologic features.

Greenbelt Plan

Policy 3.2.5.7 of the proposed Greenbelt Plan requires a 30-metre setback of agricultural buildings from key natural heritage features. We have concerns regarding this policy, especially in regards to woodlands. Efficient use of a farm property contributes to a farm business' viability, and siting these structures closer to the edge of a woodlot maximizes the utility of the land. Requiring that a barn or other agricultural building be 30 metres out from the edge of a woodlot needs to be reconsidered.

Within the proposed Greenbelt Plan, major development is defined as including any building with a ground floor area of 500 m² (5,382 ft² or approximately 50' x 108') or larger. This is not a large farm building, and modern farm buildings can actually be significantly larger than the 500 m². The Greenbelt Plan's Protected Countryside is intended to promote agricultural uses and viability, but this restrictive definition of major development serves to deter agricultural activity and growth. Farmers in the Protected Countryside must be allowed to construct farm buildings that serve their farm operations without unnecessary building size limitations. These buildings will still be required to meet applicable municipal zoning and setback requirements, and livestock buildings will still be required to meet *Nutrient Management Act* and Minimum Distance Separation requirements. BFO recommends that the definition of major development exclude all farm buildings and structures.

Oak Ridges Moraine Conservation Plan

Once again, BFO recommends that the definition of major development exclude all farm buildings and structures.

BFO recommends that the word "existing" be removed from any reference to agricultural uses, agriculture-related uses and on-farm diversified uses within the Oak Ridges Moraine Conservation Plan, as was done in the 2014 PPS. Agriculture is a constantly changing activity, with farm practices evolving over time as new research, technologies or business strategies are adopted. Continued use of the phrase "existing uses" precludes adoption of new farming methods, crops or livestock.

It is proposed that agriculture-related uses be limited to the prime agriculture areas of the Countryside of the Oak Ridges Moraine. BFO requests that this restriction of agriculture-related uses to only prime agricultural areas be removed. All farm operations, whether they're situated on prime agricultural land or rural land, should be able to pursue economically viable agriculture-related uses.

The Oak Ridges Moraine Conservation Plan proposes large setbacks from key natural heritage features, which can lead to inefficient use of farmland, particularly in the case of woodlands. Efficient use of a farm property contributes to a farm business' viability, and siting agricultural buildings closer to the



edge of a woodlot maximizes the utility of the land. Requiring that a barn or other agricultural building be 30 metres out from the edge of a woodlot needs to be reconsidered.

The Beef Farmers of Ontario would like to thank the Ministry of Municipal Affairs and Housing for the opportunity to comment on the proposed amendments to the Growth Plan for the GGH, the Greenbelt Plan and the Oak Ridges Moraine Conservation Plan. We would be pleased to answer any questions on the comments contained in this document, and we look forward to participating in further consultations on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Bowman".

Matt Bowman
President

cc: BFO Board of Directors
Ontario Federation of Agriculture

