



Ontario Federation of Agriculture

Ontario AgriCentre

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3
Tel: (519) 821-8883 • Fax: (519) 821-8810 • www.ofa.on.ca

June 3, 2015

Mr. John Ballantine, Manager
Local Government and Planning Policy Division
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, Ontario
M5G 2E5

Dear Mr. Ballantine;

Re: EBR Registry 012-3651 Bill 73 – Smart Growth for Our Communities Act, 2015.

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 36,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system and rural communities with the potential to drive the Ontario economy forward.

The Smart Growth for Our Communities Act, 2015 proposes a number of amendments to the Planning Act and the Development Charges Act, 1997. Following are our comments on the Development Charges Act amendments specifically.

The OFA wishes to reiterate the comments made in our submission to EBR 012-081 – Development Charges Act, 1997 consultation. The OFA believes that the Development Charges Act should be amended to provide a statutory exemption to farm buildings/structures from all development charges.

Most municipalities in agricultural areas have chosen to exempt farm buildings from municipal development charges. However, subsequent by-laws may inadvertently omit the existing exemptions for farm buildings/structures unless farmers and municipal counselors are vigilant.

New farm residences should be treated the same as other new residences with regards to development charges. Growth-related capital needs can be attributed to all new residences. The construction of new farm buildings/structures, however, does not generate growth-related capital requirements. Therefore, development charges should not apply to farm buildings/structures. If they do, farmers are bearing more than their share of the municipality's additional capital expenditures.

Standardizing the application of development charges to agriculture through a province-wide exemption would prevent farmers from facing inequitable treatment in a minority of municipalities that have inadvertently not provided an exemption.



The OFA is disappointed that Bill 73 does not amend the Development Charges Act to provide a statutory exemption to farm buildings/structures from all development charges.

Sincerely,

A handwritten signature in black ink, appearing to read "Don McCabe", is positioned below the word "Sincerely,".

Don McCabe
President

DM/jb

cc: OFA Board of Directors
OFA County Federations