

January 18, 2019

Mr. Ken Petersen
Provincial Planning Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street
13th Floor
Toronto, Ontario
M5G 2E5

Dear Mr. Petersen;

RE: EBR Registry No. 013-4125 Proposed open-for-business planning tool

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential to drive the Ontario economy forward.

Agriculture is a **business**. This proposal suggests that agricultural land should no longer be reserved for agriculture uses but be made available for commercial and industrial businesses. Does the Ontario government propose that agricultural businesses be shut down and paved over to make way for industrial development?

The agri-food sector is the economic powerhouse of Ontario; employing 822,000 Ontarians and generating nearly \$40 billion in GDP. In addition, agri-food has been identified as a key sector in Canada with untapped potential for growth and expansion. If we lose agricultural land to development, it is gone forever. This means a loss of rural businesses in our communities; a lost opportunity to produce more products through innovation and technological advancements; a loss of employment from on-farm food processing and agritourism; and a loss for rural communities that the Ontario Government promised to support.

While Bill 66 claims to "give businesses more flexibility to create jobs right here at home", the Proposed open-for-business planning tool forgets and abandons the businesses that are already here, our agriculture and agri-food sector. Agriculture and agri-food are the number one employer in Ontario and drives our economy forward.

OFA appreciates the Ontario government's desire to cut red tape and be "Open for Business". However, there is another way that does not compromise our agricultural businesses, our clean water, and strategic land use protection. Agri-food is the recession-resilient answer to economic growth in this province.

OFA urges the provincial government to enhance agri-food growth in Ontario by showing farmers and food businesses that we are “Open for Business”. Among the initiatives we believe would demonstrate this are;

- Use the Provincial Policy Statement definitions and language in all Four Provincial Plans. A lack of consistency across the Plans leads to confusion for businesses and subjective interpretation by the many stakeholders involved.
- Support the Agricultural System to consistently protect farmland across the Greater Golden Horseshoe and support the prosperity of the agri-food sector. OFA supports the provincial mapping of the Agricultural Land Base, including identification of Candidate Areas for inclusion in the Agricultural Land Base. OFA also supports the implementation of the agri-food network. For agriculture to prosper, smart land use planning that protects farmland needs to align with economic development to support agriculture-related businesses along the supply chain.
- Oversight of the Niagara Escarpment Plan should be moved from the Ministry of Natural Resources and Forestry (MNRF) to the Ministry of Municipal Affairs and Housing (MMAH). Businesses should not need to contact multiple ministries and multiple governing bodies for approvals.
- Target smaller communities for infrastructure and economic investments to distribute economic development, reduce congestion and growth pressures in the GTHA. The growth pressures will continue to make life unaffordable and challenging for the average resident, not to mention the pressure to develop agricultural land; Ontario’s most important resource.

The current pattern of growth is unsustainable. The Province’s priorities to increase housing supply and affordability, create jobs, reduce red tape, attract new investments, and build strategic partnerships aligns exceptionally well with OFA’s Producing Prosperity Plan, and OFA has the solutions that will achieve our mutual objectives.

1. allow municipalities to permit the use (i.e. zone the lands) without having to strictly adhere to existing local requirements (i.e. official plans and zoning),

Jurisdictions throughout the world utilize official plans and zoning to decide where growth and development will go, and where the services (roads, watermain, sewers, etc.) necessary to support it will go. Ontario is not alone in utilizing official plans and zoning to decide where growth and development will go. The proposed open-for-business planning tool totally ignores the reasons why land use planning and zoning controls exist. It totally ignores the planning principles in the PPS, Greenbelt Plan, etc. (compact urban form, orderly urban expansion, etc.). This proposal, if adopted, would necessitate the random, haphazard extension of services (sewers, watermain, electricity, natural gas,) to scattered sites outside existing urban boundaries. It ignores existing PPS (1.1.2) requirements that municipalities have;

“Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 20 years. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a *provincial plan*, that time frame may be used for municipalities within the area.

and

Nothing in policy 1.1.2 limits the planning for *infrastructure* and *public service facilities* beyond a 20-year time horizon.”

Furthermore, it ignores the rationale behind the Clean Water Act, the Great Lakes Protection Act, the Greenbelt Act, the Lake Simcoe Protection Act, the Oak Ridges Moraine Conservation Act, the Places to Grow Act, and the Resource Recovery and Circular Economy Act.

2. remove the application of a separate process for site plan control,

OFA offers no comments on this specific aspect of the proposal.

3. remove the ability to use density bonusing (community benefits in exchange for height or density) and holding by-law provisions,

OFA offers no comments on this specific aspect of the proposal.

4. allow the municipality to apply limited planning-related conditions that may help to facilitate the proposal (e.g. approval of plans and drawings that show site plan matters (transportation access, lighting, parking, etc.) and enter into agreements to ensure development conditions are secured,

OFA offers no comments on this specific aspect of the proposal.

5. allow public consultation at the discretion of the municipality, while requiring public notice after the by-law is passed,

OFA categorically opposes this. We cannot condone denying citizens their right to comment on proposed land use planning proposals **before** they come into effect. A “Government for the People” does not strip away our hard-fought rights to provide comments and suggestions on the full range of government proposals. Public input is key to maintaining the integrity of our land use planning system.

6. provide that decisions are final and cannot be appealed to the LPAT (but allow the Minister to intervene before the by-law comes into effect, 20 days after its passing,

We view this as totally unacceptable too. Good planning will stand the test of an appeal. Relying solely on Ministerial oversight is a non-starter. As the saying goes, “act in haste, repent in leisure”.

7. remove the requirement for decisions to strictly adhere to provincial policies and provincial plans (allow the Minister to impose conditions to protect matters like public health and safety when endorsing the use of the tool.

As Ontarians, our land use planning policies and processes have developed over time. Lands and features we once viewed as having little to no value, such as agricultural land, wetlands or woodlands, we now recognize and protect for their intrinsic worth. Enabling so-called “open-for-business planning tools” to strictly adhere to provincial policies and provincial plans undercuts the reasons why land use planning and zoning controls exist. Jurisdictions throughout the world utilize official plans and zoning to decide where growth and development will go, and where the services (roads, watermains, sewers, etc.) necessary to support it will go. Ontario is not alone in utilizing

official plans and zoning to decide where growth and development will go. The proposed open-for-business planning tool totally ignores the reasons why land use planning and zoning controls exist. It totally ignores the planning principles in the PPS, Greenbelt Plan, etc. (compact urban form, orderly urban expansion, etc.). This proposal, if adopted, would necessitate the random, haphazard extension of services (sewers, watermain, electricity, natural gas,) to scattered sites outside existing urban boundaries.

The Ontario Federation of Agriculture categorically and unequivocally opposes EBR Registry No. 013-4125 Proposed open-for-business planning tool. Its provisions undercut decades of land use planning. There is no demonstrated need for these provisions. The Ontario Federation of Agriculture demands that EBR Registry No. 013-4125 be scrapped.

Sincerely,



Keith Currie
President

KC/pj

cc: The Honourable Doug Ford; Premier of Ontario
The Honourable Ernie Hardeman; Minister of Agriculture, Food and Rural Affairs
The Honourable Monte McNaughton; Minister of Infrastructure
OFA Board of Directors