

January 18, 2019

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

Dear Mr. Petersen;

**RE: EBR Registry No. 013-4239 New Regulation under the Planning Act for 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.

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.

OFA appreciates the 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.

1. require confirmation that the proposal is for a new major employer,

The term "major employer" is nowhere to be found in the Provincial Policy Statement (PPS) or one of the provincial plans. The Greenbelt Plan defines "major development" as including "a building or buildings with a ground floor area of 500 m<sup>2</sup> (5282 ft<sup>2</sup>). To suggest that the minimum job creation thresholds (cited below) constitute "new major employer" numbers is unrealistic. At a minimum, Ontario's planning policies (PPS 1.1.2) mandate that Official Plans provide for;

“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.

Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.

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

Given these requirements, where is the need to forego four decades of land use planning? Throughout the entire province, there is ample vacant, serviced land to attract new businesses.

2. require evidence that the proposal would meet a minimum job creation threshold (e.g. 50 jobs for a municipality of less than 250,000 or 100 jobs for a municipality of more than 250,000 people),

Firstly, we simply do not see a facility that provides 50 or 100 jobs as a “major employer”. Secondly, including Toronto, there are only 7 municipalities in Ontario with a population over 250,000 (Toronto, Ottawa, Hamilton, Kitchener, London, Oshawa and Windsor). Municipalities throughout Ontario can readily accommodate new facilities within their existing urban boundaries, capable of providing 50 to 100 jobs.

3. identify the uses of land, buildings or structures that may be authorized by the tool, such as manufacturing and research and development, but not residential, commercial or retail as the primary use,

From OFA’s perspective, the inclusion of “but not residential, commercial or retail as the primary use” is very troubling, and casts doubt on the real reasons for these proposed changes. The government rhetoric spoke to growing businesses and jobs. Nowhere was the use of “Open for Business By-laws for residential purposes mentioned. To bury possible residential uses is disingenuous.

4. prescribe how notice is given to the Minister following the passing of an open-for-business by-law (similar to how the Minister is notified following the passing of a zoning by-law (e.g. email or personal service)

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

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 Ontario Federation of Agriculture categorically and unequivocally opposes EBR Registry No. 013-4239 New Regulation under the Planning Act for 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. 013-4239 be scrapped.

The current pattern of growth in the Greater Toronto/Hamilton Area 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.

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