

August 21, 2019

Hon. Steve Clark
Ministry of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON
M5G 2E5

Dear Minister Clark,

The Ontario Federation of Agriculture (OFA) is the leading advocate and voice for 38,000 farm families and businesses across Ontario. These farm businesses and rural communities form the backbone of a robust food system with the potential to drive the Ontario economy forward.

We are pleased to provide comments regarding EBR 019-0184 which proposes changes to O. Reg. 82/98 under the Development Charges Act. OFA opposes the proposed changes that would allow the deferral of development charges and the elimination of development charges for prescribed classes of residential buildings and ancillary structures.

The purpose of development charges is “*to pay for increased capital costs required because of increased needs for services arising from development*”. When the population of a municipality or neighborhood increases, the demand for municipal services increases. Development brings in new people and with them, increased capital costs to municipalities.

The cost of development must be paid by developers. If development does not pay for itself, those costs will be passed along to local property taxpayers, including farmers. Over the past four years, the taxable assessment of farmland has increased by an average of 64% across Ontario. This has caused a significant increase in the property tax burden paid by Ontario farmers. Farmers cannot afford further increases in taxes to help subsidize the costs that should be paid by developers.

I trust that our comments will be given due consideration in this consultation.

Sincerely,



Keith Currie
President

cc: OFA Board of Directors
Mr. John Ballantine, Manager, Financing and Infrastructure Policy Section, MMAH