

March 26, 2021

Ms. Goldie Ghamari, MPP, Chair
Mr. Isaiah Thorning, Clerk
Standing Committee on General Government
Room 1405, Whitney Block
Queen's Park, Toronto, ON
M7A 1A2
Sent via email to: comm-generalgov@ola.org

Dear Standing Committee members,

RE: Bill 257 - Broadband and Infrastructure Expansion Act, 2021

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Standing Committee on General Government regarding *Bill 257 - Broadband and Infrastructure Expansion Act, 2021*. OFA is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted, and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

OFA fully supports Schedule 1 of Bill 257 and the recognition that Ontario would benefit greatly from accelerating the expansion of broadband internet infrastructure. We also appreciate the considerable financial commitments the Ontario government has made towards expanding broadband internet into underserved areas of the province. While OFA applauds the intention of Bill 257 to expedite the delivery of broadband projects by removing barriers and streamlining processes that can cause delays to broadband projects, we are unable to support amendments to the Planning Act in Schedule 3 that would give the Minister or any other planning authority the ability to make planning decisions which are not consistent with the Provincial Policy Statement (PPS).

Reliable highspeed broadband internet service is vital to modern farm businesses and is an essential part of the continued growth and development of rural Ontario. Farmers rely on internet communications to make timely business decisions, operate on-farm technology, facilitate marketing of farm products, and access continuing education and farm management information. OFA believes that reliable, high-speed internet should be available, affordable and competitively priced to all Ontarians. Ontario's residents should not be disadvantaged for choosing to live and

work in rural areas and should have the same access, level and range of services as urban Ontarians.

We completely understand and respect the critical need to accelerate the development of reliable broadband internet infrastructure. In a recent survey of OFA members, our farmers reported the unreliability of their internet service impacted their ability to conduct regular business activities or participate in learning opportunities, caused potential and real lost revenue, and resulted in data and productivity loss. Furthermore, as a result of poor internet connections, more farmers reported they feel they are less able to participate meaningfully in the digital economy than they were five years ago. We know that expanding broadband internet infrastructure will allow our farmers to become more efficient with inputs, find new business opportunities, and remain competitive in a global agricultural marketplace.

Removal of Schedule 3 of Bill 257 relating to the Planning Act

We understand the need for the Minister of Municipal Affairs and Housing to have the power of an MZO and have supported its use in areas of the province that are without robust local planning processes. We have no objection to MZO's being used within the lands that would be considered the Urban Envelope. Shortening the timelines on re-zoning for re-development inside of Urban areas to fast-track services such as long-term care facilities or high-density residential structures makes sense, but the use of MZO's to develop previously undeveloped Greenfields or Agricultural lands does not. As we stated in our submission to ERO # 019-3233, we are concerned that Schedule 3 gives the Minister the ability to issue MZO's that are not consistent with the PPS and that this weakens the local planning process by providing developers and municipalities with a 'workaround' that could foster bad planning resulting in either individuals or government bearing the cost of dealing with poor outcomes later.

It is our view that since the language in Subsection 3(5)(a) of the Planning Act was strengthened to include the words "*shall be consistent with*," the subsequent requirement of local planning authorities to follow the PPS mandate have really begun the work of managing sprawl and allowing development in Ontario to proceed in a thoughtful and logical way. The amendments to the Planning Act proposed in Schedule 3 risks undoing that good work.

Requiring planning authorities to adhere to what is known as the "mitigation hierarchy", in which development for non-agricultural use is to be avoided first, minimized second and mitigated as a last resort in agricultural areas has been a positive improvement, yet we are still losing farmland at unacceptable rates if consideration is to be given to feeding a growing population and its future generations.

The changes introduced in Schedule 3 of Bill 257 would permit the Minister of Municipal Affairs and Housing to "take other considerations into account" when making decisions to support strong communities, a clean and healthy environment and the economic vitality of the province; however, the proposal is silent on which considerations would be taken into account to ensure that Ontario's shrinking agricultural land base continues to be preserved and protected without the obligation of compliance with the PPS if the Schedule 3 amendments to the Planning Act move forward.

OFA is therefore unable to support amendments to the Planning Act that would give the Minister or any other planning authority the ability to make planning decisions which are not consistent with the Provincial Policy Statement (PPS). We therefore respectfully request that the government **remove Schedule 3 of Bill 257** so that we can provide our full support for this Bill. Broadband expansion is very important to our rural communities including our farmers so OFA wishes to see Schedule 1 of Bill 257 move forward as soon as possible.

Sincerely,

A handwritten signature in black ink that reads "Peggy Brekveld". The signature is written in a cursive, flowing style.

Peggy Brekveld
President

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing
The Honourable Laurie Scott, MPP, Minister of Infrastructure
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs
OFA Board of Directors