

November 18, 2021

Logan Kanapathi, MPP, Committee Chair  
Isaiah Thorning, Committee Clerk  
Standing Committee on General Government  
99 Wellesley Street West  
Room 1405, Whitney Block  
Queen's Park, Toronto, ON, M7A 1A2  
Sent via email to: [comm-generalgov@ola.org](mailto:comm-generalgov@ola.org) and submitted online through  
<https://www.ola.org/en/apply-committees>

Planning Consultation  
Provincial Planning Policy Branch  
Ministry of Municipal Affairs and Housing  
777 Bay Street  
13th Floor  
Toronto, ON, M7A 2J3  
Sent via email to: [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca) and submitted online through the  
Regulatory Registry and the Environmental Registry

Dear Committee Chair and Members; and MMAH Planning Policy Officials

**Re: Standing Committee's consideration of Schedule 19 of Bill 13, Supporting People  
and Business Act, 2021; and**

**Regulatory Registry # 21-MMAH025 & ERO # 019-4419 (Proposed Additional  
Delegation of Planning Decisions)**

The Ontario Federation of Agriculture (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.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

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OFA appreciates the opportunity to provide comment on Bill 13's schedule 19 and the related proposal posted to the Regulatory Registry and the Environmental Registry. As you know, Schedule 19 outlines changes to the *Planning Act* to expand the matters that the council of a local municipality may delegate to a committee of council, to staff, or in some cases, to a committee of adjustment.

OFA is not in favour of the proposed *Planning Act* amendment. The protection of Agricultural lands is crucial, and it is important that oversight from the elected members of council continues to govern planning decisions. OFA believes that maintaining large, contiguous tracts of agricultural land for agricultural uses must be a core provincial priority. It is important that our members have assurance that planning decisions will be made by elected representatives who are subject to the requirement of being voted in by the electorate, which we believe is an imperative part of the maintenance of objectivity and public accountability.

The posting indicates that the proposed amendments would provide a new discretionary authority to delegate planning decisions dealing with minor amendments to zoning by-laws, subject to criteria established through official plan policies, and that this authority could include delegating decisions for temporary use by-laws, the lifting of holding symbols, and other minor zoning by-law amendments. It would be up to each municipality to determine whether to exercise this proposed new authority and the types of minor zoning by-law amendment decisions to delegate.

The OFA continues champion the preservation and protection of Ontario's farmlands. The protection of Ontario's agricultural lands from incompatible development, as well as its loss from urban expansion, continues to be an ongoing concern. Without strong commitments and clear policy direction for agricultural land protection from all levels of government, the economic potential of the Agricultural Land Base as a driver of Ontario's post-COVID recovery will be lost.

OFA has a longstanding commitment to wise land use planning that protects Ontario's agricultural lands, the finite and shrinking resource that underpins Ontario agriculture's contributions to our economic growth and well-being.

It is our view that allowing council to give additional decision-making authority to staff on minor planning changes beyond what is already allowed creates the opportunity in the future for further council responsibilities to be delegated to staff as well, which would be a potential outcome that OFA would not support. OFA believes that while planning approvals may be looked upon as "time-consuming" by some, decisions need to remain with the elected officials who are subject to the electoral process if accountability and transparency are to be assured.

Further, we note that the *Planning Act* has been amended a number of times recently. We urge the provincial government to exercise caution in amending it further at this time. Local municipal planning authorities and agricultural stakeholders need time to familiarize themselves with the cumulative impacts of *Planning Act* amendments which have already been adopted. It is our view that a fulsome analysis should be conducted to ensure this very important act is still functioning in the spirit with which it is intended, as this is vital to the protection of productive agricultural resources. As a result, we do not support the proposed amendment to the *Planning Act*.

OFA believes Ontario's land use planning policies must be clearly communicated to decision makers so that farmland can be reserved for farming while population and employment growth can continue to be allocated to urban settlement areas throughout Ontario.

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OFA appreciates the opportunity to provide this input.

Sincerely,

A handwritten signature in black ink, reading "Peggy Brekveld". The signature is written in a cursive, flowing style. To the right of the signature is a vertical line.

Peggy Brekveld  
President

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing  
The Honourable Lisa Thompson, Minister of Agriculture, Food and Rural Affairs  
OFA Board of Directors