



January 15, 2019

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RE: EBR Registry # 013-4125 for input on the proposed Open-for-Business Planning Tool

Ontario Farmland Trust (OFT) is a not-for-profit organization whose mission is to protect and preserve Ontario farmlands and associated agricultural, natural, and cultural features of the countryside. OFT achieves this through direct land securement, stewardship, policy research and education to benefit all Ontarians.

Thank you for the opportunity to submit feedback on the proposed Open-for-Business Planning Tool. OFT has played an active stakeholder role in the development of policies that support a prosperous, sustainable and permanent agricultural sector, including those contained in the Growth Plan, Greenbelt Plan, and Oak Ridges Moraine Conservation Plan. In an effort to continue working with the Province to develop responsible planning policies that support the agri-food sector, OFT has detailed its concerns regarding the proposed Open-for-Business Zoning By-law in the following document.

Ontario's agri-food sector is a major economic engine for the province. In terms of job creation and economic growth, a 2018 report confirmed that the agri-food sector contributes over \$39 billion to Ontario's GDP and employs more than 820,000 Ontarians in the supply chain [1]. This contribution is overwhelmingly significant in rural areas, where roughly 12% of the GDP and 10% of rural jobs are attributed to the farm sector [2]. Ontario is also positioned favourably to attract agricultural and manufacturing investment because it is a global leader in the agri-food industry and houses one of the largest agri-food hubs in North America. This, in turn, generates growth in employment and GDP.

OFT believes that the proposed Open-for-Business Zoning By-law (OFB-ZBL) places the agri-food sector and its substantial economic benefits at an unacceptable level of risk. If adopted it will jeopardize the economic contributions of the agri-food sector and expose rural areas to greater economic vulnerability. As such, **OFT recommends that proposed changes to the Planning Act to introduce the Open-for-Business Zoning By-law (OFB-ZBL) are revoked.** It is critical that all Acts that protect the permanency, health, productivity, and profitability of Ontario's farmland and the agri-food sector are retained in full and without exception.



The following sections provide greater detail regarding the OFB-ZBL's threats to the farm sector and suggests alternative actions to improve the province's business environment while attracting agri-food investment.

Threats to the Farm Sector

The OFB-ZBL could open up for development farmland that is either currently protected (e.g. through the Greenbelt Plan) or is outside of projected municipal growth areas.

This negatively impacts the agricultural sector in a number of ways. The OFB-ZBL:

- **Threatens to pave over and permanently destroy productive farmland.** Only 5% of the Canadian land base is prime agricultural land, the majority of which is in southern Ontario and contributes to the success of the Province's agri-food sector. Ontario is already losing 175 acres of farmland every day, a rate that could increase under the proposed OFB-ZBL. The loss of this land to non-agricultural uses is irreversible and negatively impacts Ontario's economy, food security, and agri-food investment potential.
- **Risks farmland fragmentation and the dismantling of the agricultural system.** A successful agri-food sector relies on a healthy farm sector, which requires access to a contiguous agricultural land base with a system of supportive infrastructure, agricultural services, distributors, and processors. This requirement is recognized by, and is being addressed through, ongoing municipal-level processes to implement the Agricultural System for the Greater Golden Horseshoe. Development approvals outside of strategic growth areas that are delineated in Official Plans and in conformity with the Provincial Policy Statement, Growth Plan, Greenbelt Plan, etc. will fragment and destroy the systems required by the farm sector. As farmland and the agricultural system is fragmented by conflicting land uses, the viability of agricultural enterprises and the agri-food sector is reduced or eliminated.
- **Will dramatically inflate farmland prices as speculation and land banking increases and further reduce affordability for farmers.** Sustaining large swaths of contiguous, affordable farmland is crucial because land ownership provides the long-term, land use certainty that is required for farmers to make investments in their property and business. This contributes to a stronger agri-food sector and more attractive investment environment.
- **Introduces conflicting land uses adjacent to land used for agricultural purposes.** This disadvantages both producers and those on adjacent properties because of the nature of agricultural activity, which generates noise, odours, and dust, and involves the use of slow-moving farm machinery and hazardous materials. Ultimately, introducing incompatible land uses makes it more difficult for farmers to continue running financially sustainable farm businesses, can interrupt normal farm practices, and can create conflict with neighbors.



- **Re-introduces uncertainty around the permanent protection of land for agriculture and agribusiness.** Uncertainty about the ongoing protection of land for agriculture discourages investment in agriculture and leads to a deterioration in the resource and the agricultural community associated with it. Given that the best agricultural land is largely located in areas experiencing growth pressures, this uncertainty and the resultant reluctance to invest in agribusiness, will weaken the agri-food sector. Furthermore, the lack of public consultation will result in farmers being unable to provide feedback, challenge decisions, and advocate for the ongoing viability of their business.
- **Increases the agricultural sector’s vulnerability to the adverse effects of climate change.** Studies in Ontario indicate that the effects of climate change will be dramatically different across the province and that heat and water stress will likely have negative impacts on agricultural productivity [3,4]. The agricultural and natural lands threatened by the proposed OFB-ZBL help to offset these negative impacts by providing services including carbon storage and flood management. Re-introduced land use uncertainty would also reduce farmers’ incentive to invest in on-farm adaptive and mitigative technologies and practices.

Actions to Improve Ontario’s Business Environment

As currently proposed, the OFB-ZBL is unnecessary and does not appropriately solve the issues it seeks to address.

Numerous studies report that there is already enough employment land designated for growth out to 2031 and beyond, meaning the provisions within the OFB-ZBL meant to open up land previously unavailable for development are unnecessary. For example, a 2017 Neptis Report notes that 85% or 87,440 ha of Designated Greenfield Area in the Greater Golden Horseshoe is unbuilt [5], and a 2017 study from Simcoe County indicated that across its 16 municipalities, there were 1,514 ha of excess employment lands to accommodate anticipated growth out to 2031 [6]. Planning horizons can be extended well beyond 2031 when growth is managed through intensification [7].

Existing planning resources, including Official Plans, already allow municipalities to respond to employment opportunities on currently designated lands and direct growth in a strategic and appropriate manner. Municipal policies were developed based on substantive amounts of work supported by public consultation and should not be pre-empted by the OFB-ZBL.

The proposed OFB-ZBL disregards the importance and necessity of coordinated, comprehensive planning to maintain and protect the integrity of regional systems, including the agricultural system. Current provincial policies address strategic planning processes at a regional level and should not be bypassed or undermined under any condition.



While the OFT is opposed to the currently proposed Open-for-Business Zoning By-law we acknowledge that there are other actions that can be taken to improve the business environment in the province and attract investment in the agri-food sector, which include:

- Coordinating the actions of provincial ministries so they work as a team to facilitate appropriate development
- Adopting an online ‘single portal’ approach to planning applications, approvals, and communications between government agencies and applicants
- Providing greater recognition and promotion of the agri-food sector as an economic engine in the province
- Promoting job creation and investment opportunities that recognize and support agricultural business potential in rural areas. Farmland is rural employment land and employment in one sector should not place jobs at risk in another, which is the current reality of the OFB-ZBL and Schedule 10 of the proposed Bill 66, *Restoring Ontario’s Competitiveness Act, 2018* given the risks they will create for agricultural viability.
- Creating land-use certainty by using existing planning or policy tools to permanently protect critical sector resources including farmland and the agricultural system.

The OFT is eager to work with the provincial government to achieve this vision.

Thank you for this opportunity to share our recommendations and feedback on the Open-for-Business Zoning By-law. We believe that Ontario has an opportunity to position itself as a national and global leader in strategies that blend environmental/farmland protection and economic growth and is capable of setting an example of how economic prosperity need not be at the expense of the environment. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with you further.

Most Sincerely,

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Executive Director
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References:

- [1] Ontario Federation of Agriculture. 2018. *Agriculture Matters – A Guide for Municipal Councillors and Staff*. <https://ofa.on.ca/resources/guide-for-municipal-councillors-and-staff/>
- [2] Ontario Federation of Agriculture. 2013. *Economic Contribution of the Ontario Farm Sector 2013*. <https://ofa.on.ca/resources/economic-contribution-ontario-farm-sector-2013/>
- [3] Ontario Centre for Climate Impacts and Adaptation Resources. N.d. *Agriculture: in a changing climate*. <http://www.climateontario.ca/doc/factsheets/Agriculture-final.pdf>
- [4] Tant & Reynolds. 2003. Impacts of Recent Climate Trends on Agriculture in Southwestern Ontario, *Canadian Water Resources*, 28 (1).
- [5] The Neptis Foundation. 2017. *An update on the total land supply: even more land available for homes and jobs in the Greater Golden Horseshoe*. http://www.neptis.org/sites/default/files/land_supply_briefs_2016/an_update_on_the_total_land_supply_even_more_land_available_for_homes_and_jobs_in_the_ggh.pdf
- [6] County of Simcoe. 2017. *Phase 2 - Employment Land Budget 2017*. <https://www.simcoe.ca/dpt/pln/growth>
- [7] The Neptis Foundation. 2013. *Implementing the Growth Plan for the Greater Golden Horseshoe: Has the strategic regional vision been compromised?* http://www.neptis.org/sites/default/files/growth_plan_2013/theneptisgrowthplanreport_final.pdf