



May 31st, 2019

Municipal Finance Policy Branch
Municipal Affairs and Housing
777 Bay Street
13th Floor
Toronto, ON
M5G 2E5

RE: EBR Registry # 019-0017 for input on Bill 108 - (Schedule 3) – the proposed *More Homes, More Choice Act: Amendments to the Development Charges Act, 1997*

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 amendments to the *Development Charges Act, 1997*, as related to Bill 108. OFT is pleased to continue working with the province to improve planning practices and strengthen policy protection for farmland.

OFT commends the ministry for the proposed removal of mandatory 10% discounts on development charges (Section 5 (1), paragraph 8). We believe this is a step towards fully accounting for the true cost of new development and alleviating the subsidy burden on existing taxpayers. We also applaud the ministry's action towards encouraging higher-density development, including the proposed development charge discount for additional dwelling units in new residential buildings. It is imperative that the province continues to disincentivize sprawl, encourage a compact built form, and effectively protect its limited farmland resources.

Notwithstanding the above commendation, OFT is concerned that the proposed amendments to reduce development costs and defer payments will perpetuate ongoing sprawl and increase the rate of greenfield development and subsequent farmland loss. Furthermore, the proposed changes do not adequately incentivize infill or redevelopment and the efficient use of existing services



While the *Development Charges Act* is a useful tool to achieve the goals of the *More Homes, More Choices Act*, it is imperative that any amendments do not further incentivize sprawl.

- 1) **OFT recommends that development charges more accurately reflect the true cost of servicing greenfield development.** Greenfield development is more costly to build, service, and maintain and thus should face higher development charges. This will work to disincentivize costly, and unnecessary, urban sprawl.
- 2) **OFT recommends that development charges in areas with existing, and underused, services should be subject to development charge discounting.** This would largely apply to infill and brownfield development where existing services can be more efficiently used. Higher priority should be placed on high-density development in these areas to more effectively follow the direction of provincial land use plans and policies, including the Provincial Policy Statement and Growth Plan for the Greater Golden Horseshoe.
- 3) **OFT recommends that development charges are maximized for development on land that is classified as a Prime Agricultural Area.** Once agricultural land is developed, its capacity for food, fibre, and fuel production is lost forever. Maximized development charges for these areas would discourage the permanent destruction of this critical non-renewable resource.

Thank you again for this opportunity to share our recommendations and feedback on the Proposed Amendments to the *Development Charges Act, 1997*. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with the province to further improve the protection of Ontario's agricultural land.

Most Sincerely,

Kathryn Enders
Executive Director
Ontario Farmland Trust