



April 2nd, 2021

Ministry of Municipal Affairs and Housing
Provincial Planning Policy Branch
777 Bay St., 13th Floor
Toronto, ON
M5G 2E5

RE: ERO Registry #019-3233 Proposed changes to Minister's zoning orders and the Planning Act

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. We protect farmland in order to ensure a safe and sustainable food supply for future generations of Ontarians. OFT achieves this through direct land securement, stewardship, policy research, and education.

Thank you for the opportunity to submit feedback on the proposed changes to the Minister's Zoning Orders and the Planning Act in Schedule 3 of Bill 257 the *Supporting Broadband and Infrastructure Act*. OFT has played an active stakeholder role in other provincial land use planning policy reviews and is pleased to continue working with the Province to strengthen policy direction in Ontario.

Ontario's agri-food sector is the largest economic sector in the province, employing more than 837,000 Ontarians along the supply chain and annually contributing over \$47 billion to the province's GDP¹. In rural areas, the agri-food sector is even more important, as roughly 12% of the GDP and 10% of rural jobs are associated with agriculture². Agricultural land is the base of the agri-food sector, and it is a finite and non-renewable resource. In order to preserve the viability of Ontario's agri-food sector, it is crucial that the province's finite supply of agricultural land is protected.

OFT would like to commend the recent emphasis the Province has put on the Agricultural Systems planning approach through recent policy amendments. This planning approach works to protect farmland and the related network of infrastructure that the agricultural sector relies on. Planning using this approach helps to protect the long-term viability of Ontario's agricultural industry by preventing non-agricultural development from fragmenting the province's agricultural land base.

Rural broadband is part of the important infrastructure that farm businesses and rural community members rely on. Access to reliable, fast internet is incredibly important, however many rural communities in Ontario still do not have adequate access to it. With the COVID-19 pandemic, the importance of internet to farm businesses has only become more apparent, as many farmers have had to transition to virtual marketplaces to conduct their business rather than in person. As such, OFT supports the Province's decision to invest in reliable rural broadband service.

However, OFT believes that Schedule 3 of the proposed Bill 257 will not work to advance rural broadband services but will negatively impact farmland and should be removed from the Bill.



Minister's Zoning Orders (MZOs) were initially introduced into provincial legislature to allow the Minister to make land use planning decisions over land that had no official plan, and in rare extenuating circumstances where there was provincially significant impact. OFT recognizes that MZOs are necessary in some, very rare, instances that have a major provincial benefit. However, OFT is concerned about the recent abundance of MZOs being used in instances that do not meet the above criteria. In 2020, the Province issued a total of 29 MZOs, almost double the number which were introduced in the 15 years prior. Many of these MZOs were in areas where there is comprehensive municipal land use planning already in place and have placed farmland and natural habitats at risk.

MZOs do not allow for input from the public and are not subject to appeal. As such, it is only appropriate that MZOs are consistent with previously passed provincial land use planning policies that have undergone a public comment period and that have been passed in a fair and democratic manner. The proposed Schedule 3 of Bill 257 would effectively remove the obligation for the Province to comply with provincial land use planning policies when issuing MZOs outside of the Greenbelt.

OFT believes that MZOs should be consistent with the land use planning policies described in the *Planning Act*, and that the changes contained in Schedule 3 will jeopardize Ontario's farmland.

OFT strongly recommends that Schedule 3 of Bill 257 is removed.

Thank you for the opportunity to provide feedback on the proposed changes to the Minister's Zoning Orders and the Planning Act in Schedule 3 of Bill 257 the *Supporting Broadband and Infrastructure Act*. We invite discussion and welcome any questions you might have regarding our submission. We look forward to working with the Province further.

Most Sincerely,

Kathryn Enders
Executive Director
Ontario Farmland Trust



References:

[1] Ontario Federation of Agriculture. 2020. 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/>