



June 12, 2025

The Honourable Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay St., 13th Floor
Toronto, ON M5G 2E5

RE: ERO 025-0504; Protect Ontario by Building Faster and Smarter Act, 2025

Dear Minister Flack,

On behalf of the Ontario Farmland Trust (OFT), thank you for the opportunity to comment on Bill 17, the *Protect Ontario by Building Faster and Smarter Act, 2025*. We appreciate the province's desire to build more homes, businesses and infrastructure and to emphasize transit-oriented communities. However, we are concerned about the implications this legislation could have on the integrity of the development application process under the *Planning Act*, and the cascading effect it could have on the sustainability of Ontario's agricultural sector and the protection of the province's finite, non-renewable farmland resource.

OFT is a not-for-profit organization dedicated to protecting and preserving Ontario's farmlands and associated agricultural, natural and cultural landscapes. We do this through direct land securement, stewardship, research and policy advocacy. Farmland comprises less than 5% of Ontario's land base yet supports the agri-food sector employing over 870,000 Ontarians and contributing more than \$50 billion annually to the province's GDP.

Farmland is a non-renewable resource. Ontario is currently losing 319 acres of farmland each day. This rate of loss is unsustainable and threatens our province's food security, climate resilience, rural economies, and long-term planning goals. We urge the province to reconsider the provisions of Bill 17 that could severely limit the integrity of the development review process under the *Planning Act* and by extension have a detrimental impact on the agricultural system.

While OFT encourages the fulsome reconsideration of Bill 17 this submission emphasizes the changes to the *Planning Act*. Bill 17 focuses on how to expedite the development of key infrastructure projects and housing throughout the province. However, it continues to overlook finding actual measures to address the core problems the citizens of this province face by choosing to emphasize quick development and urban sprawl rather than selective infill, mid-rise and multiplex housing and encouraging the development of existing available lands already designated for housing.

Bill 17 proposes to limit complete application requirements on certain planning applications under the *Planning Act* (i.e. official plan amendments, zoning by-law amendments, site plan approvals, plans of subdivisions and consents). The submission of a formal development application includes several identified technical studies and reports to justify and layout all aspects of the proposal. The submission is required to be reviewed in advance of a formal application being deemed complete under legislation.



The proposed changes significantly restrict the authority and power of a municipality to require certain technical studies and reports. While also proposing to require a municipality, without the ability to analyze, to accept certain information/materials if prepared by a prescribed professional.

This impacts the integrity of the development review process and instead of creating a more 'consistent' process and application requirements it does not account for the differences between urban and rural areas. The character of rural areas differs vastly from the type of development associated with urban areas. The blanket limitation of certain technical studies and reports may impact rural areas on a different scale than urban areas, while expanding the ability and ease of housing development on critical farmland and impacting the viability of Ontario's agricultural sector.

Lastly, accepting technical studies and reports based on information provided by prescribed professionals is a sound approach in theory. However, solely relying on this 'stamp' severely limits oversight on the part of the municipality. The municipality may be forced to accept the study on this basis, despite information that perhaps contradicts 'good' planning or even the existing policies and regulations of the local Official Plan and/or Zoning By-Law. Farmland is one of many things at risk under such a policy framework, where previously municipal oversight would allow for an application to be deemed incomplete if the technical studies and/or reports did not include the appropriate information or did not constitute 'good' planning.

Bill 17 creates a precedence of 'free-for-all' development throughout Ontario. Developments that may be inappropriate based on its impact on the rural landscape, character of a rural community, an existing agricultural industry; or simply a parcel of Class I farmland, may now be deemed complete. This could create a system where the only real remaining checks and balance is an appeal to the Ontario Land Tribunal (OLT). This takes away the power and authority of a municipality and could lend to a more fractured and disjointed balance within and between urban and rural communities.

Summary

To ensure the long-term protection of Ontario's farmland; the rural landscape and its communities; and the defined balance between urban and rural communities; the Ontario Farmland Trust recommends that the Province:

1. Remove the provisions of Bill 17 that propose changes to the complete application requirements of the *Planning Act*; and
2. Maintain the role of municipalities in planning decisions that impact farmland.

Conclusion

OFT supports the Province's goal of enhancing economic prosperity but strongly believes that this cannot come at the expense of Ontario's finite agricultural land base. Farmland is foundational to the province's economy, food security, and rural way of life. The Province has responsibility to ensure that



any new legislative tools are applied in ways that uphold, not undermine, Ontario's long-term agricultural viability, food security, and sustainability.

We respectfully request that the government amend Bill 17 to safeguard agricultural lands and uphold planning and environmental frameworks essential to their protection.

We thank you for the opportunity to provide this feedback and remain available for further discussion.

Sincerely,

A handwritten signature in grey ink, which appears to read "M. Straathof". The signature is fluid and cursive, with a large loop at the end.

Martin Straathof
Executive Director
Ontario Farmland Trust