



May 31st, 2019

Provincial Planning Policy Branch
777 Bay Street
13th Floor
Toronto, ON
M5G 2E5

RE: EBR Registry # 019-0016 for input on Bill 108 - (Schedule 12) – the proposed *More Homes, More Choice Act: Amendments to 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. OFT achieves this through direct land securement, stewardship, policy research, and education to benefit all Ontarians.

While OFT supports the province's ongoing efforts to increase housing supply and accessibility, we are concerned that the proposed amendments to the *Planning Act* will result in a departure from effective and prudent municipal land use planning. Specifically, we have concerns regarding: the drastically shortened timeframes for municipal decision making and development approvals, limitations on third party appeals, and broadened grounds for appeals under Section 17 (24) of the Act.

Forward-looking municipal planning is critical for the ongoing protection of farmland by carefully locating and approving development in a way that achieves a compact built form and complete communities. We are concerned that the proposed amendments to the *Planning Act* highlighted above will considerably detract from municipalities' ability to appropriately assess the needs of their community and plan for future growth. Furthermore, the broadened grounds for appeals could welcome unnecessary disputes of, and departure from, the direction provided by policy statements and Official Plans. To perpetuate a culture of 'good' municipal planning that avoids unnecessary and rapid loss of farmland, it is critical that the carefully considered direction provided in municipal planning documents continue to be upheld without unnecessary dispute.



Thank you for the opportunity to submit feedback on the proposed amendments to the *Planning Act*, as related to Bill 108. 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,

A handwritten signature in purple ink that reads "Kathryn Enders". The signature is fluid and cursive, written over a light blue horizontal line.

Kathryn Enders
Executive Director
Ontario Farmland Trust