

Regional Municipality of Niagara
 1815 Sir Isaac Brock Way, Thorold, ON, L2V 4T7

May 16, 2022

Re: Proposed Development Charges for Agriculture, Regional Municipality of Niagara

Dear Council Members, Staff, and Members of the Development Charges Policy Task Force:

Landscape Ontario Horticultural Trades Association represents over 200 nurseries that produce over \$270 million in farm gate sales. A significant portion of these farms are in the Niagara area. These growers represent the foundation of the broader Nursery/Landscape/Horticultural value chain that employs over 100,000 individuals and contributes 8.7 billion dollars to Ontario's economy.

We learned of proposed changes to the Region's development charges for agricultural buildings after an engagement session on May 4, 2022. The consultant proposed that the Region **amend Section 11 of the current By-law to remove agriculture from the exemptions list** as it does not align with the Region's incentive priority areas. It is our understanding that the Task Force has approved the background study, including the proposed changes to agriculture's status. Development charges are designed to support expansion and growth within a region, which makes sense for construction of additional industrial or commercial buildings, and new home builds that increase the population and burden on existing infrastructure. However, construction of additional greenhouses or farm buildings do not require significant capital investments by the Region. Therefore, there is a conflict in terms of the purpose of development charges and who should bear the cost of regional expansion in the proposed By-law.

This is alarming.

The proposed development charges would effectively destroy the potential for future growth of the agriculture sector in the Region. Not only is there an immediate financial impact on farms that are currently considering expansion, the implementation of development charges on agriculture will affect future decisions for succession planning and how (or if) next generation farmers will pursue careers in Agriculture. Other upper-tier municipalities in Ontario exclude agriculture from development charges (e.g., County of Essex, County of Simcoe, Halton Region), and if the proposed changes are implemented in the Region's new By-law it will create an incentive for farms to move or expand out of the Niagara peninsula.

According to the *Greenbelt Plan (2017)*, the Niagara region has some of Canada's 'most important and productive farmland', with [fertile soil, moderate climate, and freshwater resources that are unique] and 'cannot be duplicated elsewhere in the province or the country'. Under both Ontario's Bill 109 (*More Homes for Everyone Act, 2022*) and the *Growth Plan for the Greater Golden Horseshoe, 2020 (A Place to Grow Act 2005)*, there is an increased prioritization of home building and development in the Niagara region, however, it is shocking to think that these priorities will come at the expense of agriculture and its contribution to the Region. Both these documents reference the importance of agriculture and the importance of the Greater Golden Horseshoe in helping moderate the impacts of a changing climate. In fact, the *Greenbelt Act (2005)*

was specifically enacted to protect agricultural areas of the province, and lays out the objectives of the Greenbelt, with three of the top four objectives referencing agriculture:

"5 The objectives of the Greenbelt Plan are,

- (a) to establish a network of countryside and open space areas which supports the Oak Ridges Moraine and the Niagara Escarpment;*
- (b) to **sustain** the countryside, rural and small towns and contribute to **the economic viability of farming communities**;*
- (c) to **preserve agricultural land as a continuing commercial source of food and employment**;*
- (d) to **recognize the critical importance of the agriculture sector to the regional economy**;*..."

Further, the Region's own Official Plan (proposed 2022) acknowledges the importance of agriculture in one of the four pillar statements: *"THRIVING agriculture and tourism - A prosperous agricultural industry and world-class tourism opportunities that grow our economy and elevate the Niagara experience."*

Another troubling aspect of the proposed changes is the lack of sector engagement. We are unaware of any consultation with agricultural sectors over the last year and have been advised that local municipalities within the Region were also uninformed with regards to this proposed change. We were only appraised of these proposed changes by another agricultural sector representative after the May 4th meeting. Even the Agricultural Policy & Action Committee appears to have been left out of these discussions prior to this spring, despite ongoing communications related to development charges on farm help-houses.

Pursuant to these concerns, we request the following:

- a) that the Region halt all further discussions and ultimate approval of the proposed By-law until full consultation has been completed with the agricultural sector (this would require an amendment to extend the existing By-law 2017-98),
- b) that the agricultural sector maintains its exemption in the proposed 2022 By-law, and
- c) that the Region re-instate the exemption for on-site farm help-house development charges.

The implications of the proposed development charges By-law locally, provincially, and nationally are significant and devastating. We look forward to working with the Region on these issues to maintain a thriving and sustainable agricultural community within the Region of Niagara.

Sincerely,



Tony DiGiovanni
 Executive Director
 Landscape Ontario Horticultural Trades Association