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LONG-TERM THINKING FOR TODAY'S ISSUES

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May 18, 2022

Niagara Regional Council  
Attention: Mr. Jim Bradley, Chair  
c/o Region Clerk  
1815 Sir Isaac Brock Way  
Thorold, ON  
L2V 4T7  
Delivered via email: [clerk@niagararegion.ca](mailto:clerk@niagararegion.ca), [jim.bradley@niagararegion.ca](mailto:jim.bradley@niagararegion.ca)

## **Re: Proposed Development Charge Bylaw**

Dear Chair Bradley and Niagara Region Council,

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario who are called to the vocation of farming. CFFO policy promotes economically, socially, and environmentally sustainable farming, advocating that farmers receive fair return for their production and stewardship efforts.

We are writing to express our deep concern over the proposed new bylaw, slated to take effect September 1, 2022, that would remove the current “agricultural uses” exemption for regional development charges. There will be significant negative impacts to farm businesses in Niagara Region should this bylaw go forward. We are writing to request:

- That the Region pause the process leading to passage of the new bylaw until the agricultural sector has been fully consulted on the proposed bylaw and its implications.

The CFFO further requests:

- That the Region amend the proposed new bylaw to continue the discretionary exemption from development charges for agricultural uses.
- That the Region include “accommodation for farm labour” in its definition of “agricultural uses” regarding development charges.

### **Value of Agriculture in Niagara Region**

Agriculture is a key component of the character, culture and economy of the Niagara Region. Niagara Region includes portions of the Niagara Escarpment, a vital part of Ontario’s Greenbelt, and significant specialty crop lands. The Greenbelt designation specifically “supports agriculture as the predominant land use.” Farm businesses are successful in part because of the advantages provided by the unique geography, soils and microclimates of the region. Primary agriculture and the agri-food system as a whole significantly contribute to the economy of the Region, including to employment – one of the Council’s stated priority

areas. However, farm businesses continue to face significant risks and thin margins. Policies such as the “agricultural uses” exemption from development charges contribute to the overall success of and continued investment in agricultural businesses in the region. Removing this exemption would have devastating impacts for existing businesses, and especially for future growth and investment within the region.

### **Definition of Agricultural Uses**

The CFFO supports the use of the definition of “agricultural uses” from the *Provincial Policy Statement, 2020* in determining where it is appropriate to apply an agricultural exemption to development charges:

Agricultural uses: means the growing of crops, including nursery, biomass, and horticultural crops; raising of livestock; raising of other animals for food, fur or fibre, including poultry and fish; aquaculture; apiaries; agro-forestry; maple syrup production; and associated on-farm buildings and structures, including, but not limited to livestock facilities, manure storages, value-retaining facilities, and accommodation for full-time farm labour when the size and nature of the operation requires additional employment. (*Provincial Policy Statement, 2020, pg. 40*)

This definition includes accommodation for farm labour, which CFFO also sees as appropriate to include in the exemption, particularly in Niagara Region, where farm labour accommodation is commonly required on-farm.

### **Religious Exemption**

As an organization of Christian farmers, we also wish to note our objection to the proposal to remove the current religious exemption from development charges in the new proposed bylaw. Buildings that fall under religious uses, including places of worship, provide significant value to the overall vitality of community life in the region. We ask that the Council also continue this exemption, in recognition of the value of religious communities and their charitable work to the region as a whole.

### **Conclusion**

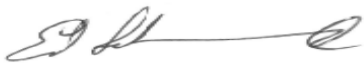
The CFFO requests that the Niagara Regional Council pause the process leading to passage of the new bylaw until the agricultural sector has been fully consulted on the proposed bylaw and its implications.

The CFFO further requests that the Region amend the proposed new bylaw to continue the discretionary exemption from development charges for agricultural uses. The definition of “agricultural uses” for this purpose should include “accommodation for farm labour.”

The CFFO further requests that the Council also continue the current religious exemption from development charges.

We appreciate your consideration of our comments and concerns.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario



John Kikkert, President  
Niagara Christian Farmers Association