



The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street
17th Floor
Toronto, ON
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July 26, 2021

Dear Minister Clark

Re- The request for a Minister's Zoning Order for 6332 Line 131, Perth East from Percon Developments Inc.

The Perth County Federation of Agriculture (PCFA) represents the unique farming interests of Perth County farmers. After 75 years, we are proud to represent over 1,800 farming families in Perth County. PCFA believes the protection of prime agricultural land for agricultural use is of paramount importance.

With support from the Ontario Federation of Agriculture (OFA), we fully recognize the need for Ministerial authority to issue Minister's Zoning Orders (MZOs) for municipalities without robust local planning processes in place. For these municipalities, MZOs serve the purpose in facilitating orderly growth and development – a use of Minister's Zoning Orders we support. We also have no objection to the use of MZO's for redevelopment of lands within the urban envelope.

However, PCFA must again emphasize its strong opposition to the recent proliferation of MZOs issued for municipalities such as ours Perth County with robust planning systems, Official Plans and Zoning By-laws. Such frequent use of MZOs undermines Ontario's long-established system of land use planning under the Planning Act, Provincial Policy Statement (PPS) and municipal Official Plans and Zoning By-laws, and we have expressed opposition to our local municipalities as early as 2020.

While MZOs are written to enable certain specified uses on the subject lands, they ignore the application of key Provincial Policy Statement criteria for settlement expansions, such as how Ontario's Minimum Distance Separation (MDS) formulae and guidelines will be applied to MZO-facilitated developments, that are adjacent to ongoing, active livestock/poultry farm operations.

PCFA is opposed to the use of an MZO to bypass the process when viable Official Plan options remain available. Honouring requests for MZO's by developers will promote overruling local zoning that is built in collaboration with the local community and is consistent with the PPS.

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PCFA is not opposed to sensible, well planned additions to our local communities. However, leapfrogging beyond established boundaries, exposes even more land to potential development. These additions to our communities need to be carefully planned.

Agricultural Impact Assessments (AIAs) are referenced in A Place to Grow: Growth Plan for the Greater Golden Horseshoe (GGH), the Greenbelt Plan and the Provincial Policy Statement, as studies “that evaluate the potential impacts on non-agricultural development on agricultural operations and the Agricultural System and recommends ways to avoid, or if avoidance is not possible, minimize and mitigate adverse effects”.

OFA policy has called for the widespread use of AIAs beyond the GGH area to ensure that any negative impacts of proposed developments are first avoided, then minimized and lastly mitigated and this is a policy PCFA also believes should be required. Proposed MZOs are not evaluated based on Agricultural Impact Assessments, a shortcoming that further underscores the deficiencies in using them in municipalities with robust, Ministry-approved Official Plans and Zoning By-laws.

PCFA is opposed to the use of Minister’s Zoning Orders to develop farmland in municipalities like the County of Perth with well-developed, Ministry-approved Official Plans and Zoning By-laws. We remain opposed to MZO requests within Perth County, and we ask you to consider this input in your decisions.

We request that you do not grant a Minister's Zoning Order for 6332 Line 131, Perth East from Percon Developments Inc.

Sincerely,

Sara Wood, President,

Perth County Federation of Agriculture

Copied:

Peggy Brekveld, President Ontario Federation of Agriculture