



The Perth County Federation of Agriculture (PCFA) is a non-profit organization that represents over 1800 active farmers in Perth County on matters that directly affect the future of farmland and farm businesses.

PCFA has several concerns about the proposed New Official Plan for Perth County. We are in the process of reviewing it and will be submitting further comments for consideration:

1. First, we would like to address the timeline. It has been communicated to PCFA that the County would like to have the Official Plan finalized by May. With the Province not finalizing the Provincial Policy Statement yet, and the recent changes to the Conservation Authorities Act, we feel that there will be significant changes that will happen to the New Official Plan. These changes should be available to the public and communicated through a public meeting before the plan is adopted.
2. Land with an agricultural designation in Perth County contributes significant GDP to the Province and is the #1 economic driver in our County. As of the last census, agriculture in Perth contributed \$2.7 billion to the provincial GDP. With this in mind, we have significant concerns regarding the wording in Section 3.5.1 Agriculture Objectives.

#### *3.5.1 Agriculture Objectives*

*The County shall support healthy, integrated and viable agricultural activities through the following objectives*

*a) Maintain and build upon the County's rural character, leveraging rural amenities and assets, such as agricultural activities and farm operations, recreational and tourism opportunities, cultural heritage, and natural resources.*

*b) Protect lands designated 'Agriculture' for long-term agricultural uses.*

*c) Direct non-agricultural uses to Settlement Areas.*

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- d) *Promote the continued viability, importance, and diversification of agricultural activities including: recognizing all types, sizes and intensities of agricultural operations and supporting agriculture related uses and on-farm diversified uses.*
  - e) *Direct larger-scale agriculture-related uses closer to settlement areas where municipal infrastructure including arterial road networks, greater utility networks, and emergency response services/infrastructure exist.*
  - f) *Provide opportunities for sustainable and diversified agri-tourism and passive recreation, including leveraging historical, cultural, natural, agricultural, and recreational assets.*
  - g) *Conserve the biodiversity and ecological benefits provided by the natural environment.*
- In section a) we don't feel that leveraging rural character and amenities for tourism and cultural heritage should be the driving force behind the main economic driver for this County. We feel the wording in the previous Official Plan reflects these ideals better as seen below.
    - *Section 5 Agriculture*
    - *5.2 GOALS The following goals are established for the "Agriculture" designation:*
    - *(a) To ensure that prime agricultural lands in Perth County are protected and preserved for the production of food, fibre and fuel;*
    - *(b) To provide agriculture with an area free from conflicting and/or incompatible land use activities, particularly non-farm related development;*
    - *(c) To support the needs of agriculture and the agricultural community by permitting land use activities that are complementary to and supportive of agriculture;*
    - *(d) To ensure maximum flexibility for farmers to engage in differing types of agricultural operations;*
    - *(e) To prevent the break-up of farms into smaller holdings for non-farm use;*
    - *(f) To encourage the carrying out of good farm management and land stewardship practices on farm properties; and*
    - *(g) To state a strong municipal commitment to agriculture as the predominant land use activity in Perth County and a major economic importance to the County.*
  - The use of the term 'passive recreation' is also a concern. This opens the door to misinterpretation of the intent of agricultural land use. Better definition of this term is suggested.

3. In section 5.1.1 Agriculture Lot Creation and Adjustment, PCFA suggests that, in order to provide a higher degree of protection to the surrounding farming operations that as a condition of consent to sever, the house being severed requires a statement on title recognising the Normal Farming Practices that will be taking place around them. This has been done in the Official Plan of Adelaide Metcalfe Twp, Middlesex County. The link can be found here:

<https://www.adelaidemetcalfe.on.ca/sites/default/files/2023-02/AM%20OP%20February%202023%20Consolidation.pdf>

- And the policy as written is seen below:

*Section 3 Land Use Policies, 3.1 Agricultural Areas Adelaide Metcalfe*

*3.1.9 Agriculture Consent Policies*

*3.1.9.6 The severance of dwellings surplus to a farming operation as a result of farm consolidation shall be permitted provided the following criteria is satisfied:*

***k) A notice is registered on the title of the proposed residential lot specifically notifying owners of normal farm practices, as outlined in the Farming and Food Production Act, 1998, as amended.***

- This registration on title is also recommended for new lot creation in settlement areas bordering agricultural land as well as in areas that are on the urban fringe around Stratford and St.Mary's
- With so many urban people migrating to the County of Perth, it would also be appreciated if the official plan would support the education of Normal Farming Practices that could be provided by Municipal Councils when any new residential lot is created. For example, what is a slow moving vehicle sign, or what are normal farming practices. We have been told that Agriculture is the most important industry in the County at the Public Meetings. Support for this would help mitigate conflicts between farmers and the non-farming population and we ask that this be included in the Official Plan.

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4. PCFA also has concerns with the new Settlement areas being proposed around Listowel. In several areas, Settlement areas overlap with MDS requirements on neighbouring agricultural land. It is highly suggested that Perth not designate settlement areas on lands affected by MDS. Doing so would cause the farmer not to be able to expand their business in the future. It also has the potential to create more conflict between the farming and non-farming population due to Normal Farm Practices.
  
5. There are also many areas in the County that are proposed to have new settlement areas as well as new employment lands. PCFA asks that the County notify the property owners surrounding these areas as well as property owners affected by the changes by mail. This notice will allow the farmer to make future plans to grow their business while being aware of changes to their property zoning or neighbouring property zoning appropriately and its potential effects on MDS.
  
6. It is important to recognize the value the Municipal Drain System brings to farmers in Perth County. Most municipal drains are either open ditches or closed systems such as pipes or tiles buried in the ground and are identified by a municipal bylaw that adopts an engineers report. According to the page [www.ontario.ca/page/municipal-drains](http://www.ontario.ca/page/municipal-drains), the municipality is responsible for the future maintenance and repair of municipal drains. This page also states “*Alongside every municipal drain there is an unregistered working space the municipality has the right to use to maintain or repair the drain. It is recommended that you keep this working space accessible and do not plant trees or build structures in this area.*”

In the New Official Plan 3.7.5.4 *Watercourse and Fish Habitat*

*d) For the purposes of Section 3.7.5.4 (b) and (c), all open watercourses are considered to be potential fish habitat in accordance with the Perth Natural Heritage System Study.*

*g) The protection and establishment of naturally vegetated buffer strips, tree planting and installation of native shrubs and grasses along watercourses, water bodies and headwater areas is encouraged to enhance the natural corridor function, cool water temperatures and protect watercourse banks from erosion.*

Due to this contradiction with provincial recommendations, it is suggested that Municipal drains not be considered potential fish habitat and that trees not be recommended to be planted along them to allow for easier maintenance. PCFA does recognize the importance of a buffer zone along open municipal drains and would encourage this to prevent erosion and run off. Open Municipal Drains should be in a separate class and not considered part of the Natural Environment System.

7. In Section 3.7.5.6 *Lands Adjacent to Natural Environment Features* Table 3.1 sets distances for requirements for development in land adjacent to Natural Environment. This is the zone that requires landowners to do an Environmental Impact Assessment and is set at 120 meters for most types of Natural Environment. PCFA feels that 120 meters is unreasonable for all types of Natural Environment and should be only used for provincially significant wetlands. All other types should be at 50 meters for adjacent lands. We also recognize that the *Proposed updates to the regulation of development for the protection of people and property from Natural Hazards in Ontario* may also have an affect on adjacent land distances.

This is PCFA's initial assessment of Perth County's New Official plan. We will be submitting more comments as we study the plan. Based on comments made to our board, we feel there is a lack of

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trust between the farming population and the Municipality. Creating an official Plan that is strongly worded in the protection of Agriculture lands and farming practices will go a long way to help rebuild that. We look forward to working with the County and the Planning department to help build an official plan that continues to support agriculture.

Sincerely,

Derek Van De Walle, President

Perth County Federation of Agriculture

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