



The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street
17th Floor
Toronto, ON
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September 4, 2020

Dear Minister Clark:

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.

As of 2016, Census data indicates that Perth County contains 518,023 Acres of farmland, over 4% of the farmland in Ontario. Ontario agricultural lands occupy less than 5% of the province's overall land area and our agricultural lands are a finite and shrinking resource that all Ontarians benefit from, not only for the ability of these lands to provide us with a secure supply of safe, affordable and environmentally sustainable food, fibre and fuel but also for the concurrent environmental and ecological goods and services that all Ontarians derive from our agricultural lands. In alphabetical order, these include; aesthetic and recreational space, air quality (including oxygen production), biodiversity, carbon sequestration, climate change mitigation, nutrient cycling, pollination services, soil erosion control, water cycling (purification, retention, flood mitigation, groundwater recharge), and wildlife and endangered species habitat.

Despite occupying less than 5% of Ontario's overall area, agriculture and agri-food processing are Ontario's number one economic drivers. In 2019, Ontario's agriculture and agri-food sector, from field to fork, contributed \$47.28 billion to Ontario's economy and supported 860,494 jobs. Decision makers must never lose sight of this reality when making decisions about future agricultural land loss to development for population and employment growth.

In January 2020, a proposed boundary adjustment between the City of Stratford, the Township of Perth South, and the County of Perth was brought to the attention of PCFA by a county member with concerns. As the consultation process proceeded, more individuals with concerns contacted PCFA. Throughout this process there were numerous concerns with not only the proposed boundary adjustment, but also the handling of the process by local municipalities. Previous correspondence from PCFA on this matter was sent to you dated May 1, 2020. These concerns have increased with your use of a Municipal Zoning Order (MZO).

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With support from the Ontario Federation of Agriculture (OFA), we fully recognize the need for Ministerial authority to issue Municipal Zoning Orders (MZOs) for municipalities without municipal organization and therefore, without Official Plans and Zoning By-laws. For these municipalities, MZOs serve the purpose in facilitating orderly growth and development – a use of Municipal Zoning Orders we support.

However, PCFA must express its strong opposition to the recent proliferation of Municipal Zoning Orders (MZOs) issued for municipalities such as ours with robust planning systems, Official Plans and Zoning By-laws. In fact, the County of Perth has been in the process of updating their Official Plan during their five-year review. Such frequent use 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.

Ontario has a well-established system for amending municipal Official Plans and Zoning By-laws to accommodate population and employment growth, including a system for appeals. The recent, short sighted issuance of multiple MZOs, short circuits these long-established planning principles and policies. It deprives citizens impacted by these MZOs the ability to be consulted on proposed amendments to municipal Official Plans and Zoning By-laws.

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.

Minimum Distance Separation (MDS) is utilized to separate livestock/poultry operations from adjacent non-farm developments to minimize odour complaints and to enable livestock/poultry operations to expand. In a settlement area boundary expansion, section 1.1.3.8 of the PPS dictates it occur during a municipal comprehensive review and when specified criteria have been addressed, including the proposed growth that cannot be accommodated through intensification, redevelopment and designated growth areas, the existing suitable infrastructure, that for prime agricultural lands alternative locations have been considered, that there are no reasonable alternatives to the proposed expansion, that the expansion complies with MDS and that the potential impacts of settlement expansion on agricultural operations are mitigated.

Agricultural Impact Assessments (AIAs) are referenced in A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 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".

PCFA endorses the OFA policy of the widespread use of AIAs to ensure that any negative impacts of proposed developments are first avoided, then minimized and lastly mitigated. 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.

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PCFA is opposed to the use of Ministerial Zoning Orders for municipalities like the County of Perth with well-developed, Ministry-approved Official Plans and Zoning By-laws. We would appreciate the opportunity to speak with you further about this at your convenience.

Sincerely,

Tim Halliday

Perth County Federation of Agriculture President

cc:

Premier Ford
Minister Hardeman
Randy Pettapiece, MP Perth Wellington
OFA Board
City of Stratford
County of Perth
Perth South
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