



Phone 519-229-8866 Or 1-866-829-8866
Email: perthcountyfedofag@gmail.com
www.perthcountyfarmers.ca

President
Tim Halliday
8591 Road 175, Gowanstown N0G1Y0
519-291-3374 Home
thalliday33@gmail.com

Office Administrator
Sue Shafer

January 31, 2020

Re: Proposed Annexation of land between the City of Stratford, the County of Perth, and the Township of Perth South

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 1,700 farming families in Perth County.

PCFA believes the protection of prime agricultural land for agricultural use is of paramount importance.

Thank you for responding to our questions, unfortunately this response does not answer our concerns. Further clarification is necessary.

•Regarding the City of Stratford's current inventory of industrial lands, including land in development, and land yet to be developed. You reference current companies' expansion plans, investStratford's effort reviewing options, and identifying lands for acquisition, and land being used for providing services. Your answer indicates what land is still available for purchase. This **does not** show what lands are owned by other companies not yet developed

•It is encouraging to note that the current "brownfield" areas that are within current City boundaries are being marketed (23 acres) or are privately owned (3.2acres). To clarify there are at least 23 acres of "brownfield land" still available for development?

•Is there currently a timeline for this land being developed? Unanswered.

•The clarification of the sizes of industrial lots for interested parties is helpful. However, we are interested in what specific types of industries are being sought on the properties referenced in the proposal?

•Current industrial areas have substantial "green space" on their properties. What percentage of property is required to accommodate "green space"? Is there opportunity to develop properties more densely, to reduce land being removed from production? Unanswered which leaves us to believe the city has no environmental plan to require intensification.

The Perth County Federation of Agriculture represents 1700 farmers from Perth County. Perth County has over 498,159 acres of fertile land and produces more agricultural output than 4 other provinces combined. Perth County farmers production include dairy products, chicken, eggs, beef, pork, grains, sheep and vegetables. Perth County farmers pride themselves of being stewards of the environment.

•Regarding drainage you state that appropriate drainage accompanies development, and that adjacent properties will not have a drainage impact. Will drainage be serviced through the City of Stratford, or via a municipal drain in Perth South?

•Regarding Minimum Distance Setback requirements, we appreciate that the MDS formulae will be respected. We need information on what mitigation efforts would be used to support the pre-existing farm businesses.

•We are familiar with the Farming and Food Production Protection Act, 1998 (FFPPA), and the functions of the Normal Farm Practices Protection Board (NFPPB). Our question was “what efforts will be taken to support Normal Farm Practices”? We require more than recognition of the importance of farmland in the area and acknowledgement of Normal Farm Practices existence.

•The proposal mentions agreements between the City of Stratford, the Municipality of Perth South, and the County Perth. How often will these agreements be reviewed and renewed? It is concerning that there are no plans for possible reviews in the future.

•You have provided no answer for how infrastructure upgrades for Line 29 will be managed in the future.

- Does the Municipality of Perth South or the County of Perth have the cumulative values of productive agricultural land lost in their respective area? If they do, what are those values, for example acres/year, or acres in the last 5, 10, and 20 years? Unanswered
- What are the plans or policies in place to better limit the loss of prime agricultural land?

Perth County is a leader with over 498,000 acres of Agricultural land being utilized by farm operations. With boundaries adjacent to the Greater Golden Horseshoe, Perth County agriculture is being exposed to development “leapfrogging” over the Green Belt. Perth County, its lower tier members, and the cities of Stratford and St. Marys must prioritize the saving of agriculture land during planning.

In addition the PCFA must go on record to:

1. Object to the short notice received by everyone. Additionally, the time to review a “draft planning justification report” which appeared only shortly before the public meeting was not sufficient for these technical answers. It is deeply concerning that the city and its partner municipalities seem to have made up their mind and have provided no *real* avenue for input.

2. We categorically object to the addition of the subject lands being added to the City of Stratford.

PCFA would like to receive answers and clarifications in writing for the inquiries above.

We also wish to remind our municipalities that without fulsome and aggressive planning *designed* to preserve farmland above all; we will fail in this important task for the future.

We have calculated that *1540 acres* of farmland have been lost to the city of Stratford in the last 20 years. We see no evidence of that planning. (attachment 1)

We ask that the municipalities remember that doing what is right is not always the easiest or cheapest option.

Tim Halliday, President

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Attachment 1 (page 5 of the Planning Justification Report Jan 2020, Harrington McAvan Ltd.)

Year of Annexation	Purpose	Area in Hectares (acres)
2001	Northeast Secondary Plan	84.2 ha (208.1 acres)
2004	Stratford West Secondary Plan	130.6 ha (322.7 acres)
2005	Northeast Secondary Plan	57.4 ha (141.8 acres)
2007	Stratford West Secondary Plan	126.5 ha (312.6 acres)
2011	Residential	38.4 ha (94.8 acres)
2016	Residential / Commercial	16.0 ha (39.5 acres)
2019	Residential / Commercial	20.0 ha (49.4 acres)
Subtotal Residential		473.1 ha (1,169 acres)
2003	Employment	45.6 ha (112.8 acres)
2005	Employment	83.2 ha (205.6 acres)
2006	Employment	21.6 ha (53.4 acres)
Subtotal Employment		150.4 ha (371.6 acres)
TOTAL		623.5 ha (1,540.7 acres)