



LONG-TERM THINKING FOR TODAY'S ISSUES

January 30, 2021

Planning Consultation
Provincial Planning Policy Branch
Ontario Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3
Via email: PlanningConsultation@ontario.ca

Re: ERO 019-2811 Proposed Implementation of Provisions in the Planning Act that Provide the Minister Enhanced Authority to Address Certain Matters as Part of a Zoning Order

Dear Ministry,

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.

The CFFO is concerned about the use of Minister's Zoning Orders in regions that have established planning processes in place for two primary reasons. Our first key concern relates to the ongoing risk posed to farmland by development pressure. Our second key concern is the removal of public input and consultation when development approvals come through Minister's Zoning Orders.

Protection of Farmland

As a farm organization, we are concerned about the protection of productive agricultural land. It is not clear from the changes to the *Planning Act* what, if any, processes are in place to weigh the importance of protecting productive farmland when considering issuing a Minister's Zoning Order. There are already examples of farmland being slated for development through Minister's Zoning Orders.

While the government has been clear that existing Greenbelt protections will be respected, there have been no other indications about how the value of farmland or natural areas will be considered in other regions of the province through the Minister's Zoning Order permit process.

Where a Minister's Zoning Order is being considered, it is vital that due consideration is given to the value of productive farmland, where such land is being put at risk through development. Ontario's farmland is valuable as the foundation for the significant economic contributions of our overall agri-food sector. The agriculture and agri-food sector has proven to be resilient in economic downturns and agile in adjusting to significant changes and new opportunities. It will be an important sector in helping to rebuild our Ontario economy. Farmland also provides many important environmental goods and services. These benefits need to be appropriately considered when reviewing development proposals

that will permanently remove farmland from production requested through the Minister's Zoning Order process.

Public Input on Land Use Decisions

The CFFO recognizes that there are many competing interests for finite land resources in Ontario. Our most productive farmland is also within regions of the province under the most development pressure. To make the best decisions about how to balance development with preservation of farmland and natural areas, public input and local knowledge is necessary. This is not best achieved through developmental approvals made at a Ministry level with no opportunity for public input. Where an existing planning process is already in place, the CFFO does not see the use of Minister's Zoning Orders as necessary or appropriate. Democracy and the process for public posting and input does take time, but this is the best way to suitably balance the many competing demands for land use in our diverse communities in Ontario.

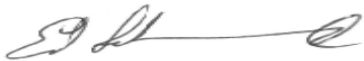
Conclusion

The CFFO is concerned that our best productive farmland will be put at greater risk through the process of granting Minister's Zoning Orders to expediate development projects. Clear guidelines for protecting farmland and considering the impact on farmland need to be part of the Minister's Zoning Order process beyond the Greenbelt areas.

Ultimately, however, the CFFO sees the best land use planning decisions coming from land use planning processes that include public input and local knowledge. In regions of the province with established land use planning processes in place, the CFFO does not see the use of Minister's Zoning Orders as appropriate.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President
Christian Farmers Federation of Ontario