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LONG-TERM THINKING FOR TODAY'S ISSUES

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April 1, 2021

Planning Consultation  
Provincial Planning Policy Branch  
Ontario Ministry of Municipal Affairs and Housing  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, ON M7A 2J3  
Via email: [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca)

## Re: ERO 019-3233 Proposed Changes to Minister's Zoning Orders and the Planning Act

Dear Planning Consultation Staff,

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.

### Proposal in Schedule 3 of Bill 257

As a farm organization, we are concerned about the protection of productive agricultural land. There is significant prime agricultural land outside the current Greenbelt boundaries. This land is highly valuable as a source of food, as an economic driver and as a provider of environmental goods and services. It is not vacant land merely awaiting "development."

Until now, the expectation has been that for any approval issued through the Minister's Zoning Order (MZO) process, the current Provincial Policy Statement regulations and any other applicable regional planning regulations, such as A Place to Grow: Growth Plan for the Greater Golden Horseshoe, would apply. The proposed changes in Schedule 3 of Bill 257, *Supporting Broadband and Infrastructure Expansion Act*, would enable MZOs to override any planning policy intended to protect farmland outside of the Greenbelt.

The CFFO requests that Schedule 3 of Bill 257, be removed, in order to ensure that protections on farmland through the Provincial Policy Statement and other regional planning policies will still apply even for the MZO approval process.

If Schedule 3 is not removed, the CFFO requests that the Ministry clarify what protections will be in place to require minimum protection of farmland, what considerations will be given to the value of farmland and how potential impacts from developments on surrounding farm businesses will be mitigated through the MZO approval process.

## Use of Minister's Zoning Orders

The CFFO recognizes the importance of economic recovery for the province and applauds the government's efforts to support businesses and encourage opportunities for economic recovery in these challenging times. The CFFO recognizes that it is primarily out of this economic concern that significantly more MZO's have been issued in regions of the province where MZO's historically have been uncommon. We do not object to MZO's as a tool to protect provincial interests, including to help support economic recovery.

The CFFO is deeply concerned, however, about the loss of productive farmland from the use of MZO's. We strongly encourage MZO's to be issued only within established settled areas through the use of brownfield redevelopment or development within lands already zoned for development.

It is also important to consider the many different opportunities across the province, and especially in rural areas, for economic recovery and expansion. Ontario's farmland is the foundation of 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.

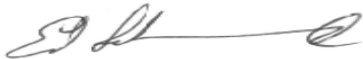
We are also concerned about the removal of public input and consultation when development approvals come through Minister's Zoning Orders. It is important to consider the value of local knowledge and public input in the land use decision-making process. We strongly encourage that Minister's Zoning Orders should be used sparingly, and only when there is clear public support within both the municipality and the surrounding region.

## Conclusion

The CFFO is concerned that our best productive farmland will be put at greater risk if existing protections through the Provincial Policy Statement and other regional planning policies no longer apply to Minister's Zoning Orders. We request that Schedule 3 of Bill 257 be removed. If it is not removed, we request that clear guidelines for protecting farmland and consideration of development impacts on farmland be part of the Minister's Zoning Order process beyond the Greenbelt areas.

We appreciate your consideration of our concerns and comments.

Sincerely,



Ed Scharringa, President  
Christian Farmers Federation of Ontario