

Planning Consultation
Provincial Planning Policy Branch
Ministry of Municipal Affairs
777 Bay Street
13th floor
Toronto, ON M7A 2J3

January 29, 2021

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 Planning Consultation team:

The National Farmers Union – Ontario (NFU-O) is an accredited farm organization representing thousands of sustainable family farmers in Ontario and has advocated for farm families across Ontario and Canada since 1969. Members work together to achieve agricultural policies that ensure dignity and income security for farm families, while protecting and enhancing rural environments for future generations. The NFU-O collaborates locally, nationally and internationally to research, educate and share effective solutions that lead to a better world for farm families and their communities.

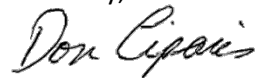
The NFU-O appreciates the opportunity being given to comment on the proposed implementation of provisions in the Planning Act that would provide the Minister with enhanced authority via Minister's Zoning Orders (MZO's) to address site plan matters and apply inclusionary zoning provisions as part of a zoning order and is pleased to share these thoughts. The members of the NFU-O and their families are very concerned about the changing nature of our climate and the ability of farmers to feed the people of Ontario and Canada. As a progressive organization, we are constantly looking at ways to adapt to a changing and at times unpredictable climate, but one constant remains undisputed in that discussion and that pertains to the environmental benefits provided by woodlots, wetlands, and other natural areas and the absolute necessity of maintaining them to continue providing environmental benefits to the public as Ontario's farmers work to protect farmland to feed the province's families for the present and the future.

Without any consideration of the benefits of a vibrant natural world and the farmland in place to help protect it, Section 47 of the Planning Act now provides the Minister with the authority to zone any property in the province for any particular purpose. The Minister does not have to give notice or consult with the public prior to issuing or revoking a zoning order effectively eliminating public participation in each municipal planning decision.

This departure from the democratic traditions of resident input in municipal planning and decision-making must not be used lightly and then only extremely rarely. These MZO's are not even subject to appeal to the Local Planning Appeal Tribunal (LPAT). The recent wave of decisions to rush development on farmland and green space by issuing or revoking zoning orders is disturbing. The people of Ontario must have meaningful and effective opportunities to participate in the municipal planning process that affects their communities and its priorities, not have their normal planning process circumvented by a model where the provincial government takes over municipal planning and decisions are made between developer lobbyists and Queen's Park.

The NFU-O requests that the Government respect the traditions of Ontario's municipal planning history and return to the traditional, infrequent use of MZO's for land-use planning, and we ask, along with Ontario Nature and CELA, that Section 47 of the *Planning Act* be amended so that the Minister may issue MZO's only in areas lacking planning controls or to prohibit development that would adversely affect the preservation of farmland or the protection of natural heritage. MZO's should be consistent with applicable official plans and provincial policies, and the Ministry should focus on enhancing community resilience to climate change by strengthening public participation in determining the future of our farm lands, forests, wetlands, and other natural areas that are critical to achieving that goal.

Sincerely,



Don Ciparis,
National Farmers Union – Ontario, President