

Submission to the Ministry of Municipal Affairs and Housing – ERO 026-0014 March 8 2026 timeline

Re: Minister's Zoning Order Request – 4423 Highbury Avenue South, City of London

Dear Ministry Officials,

I am writing to comment on the proposed Minister's Zoning Order (MZO) for 4423 Highbury Avenue South, submitted by Dancor Construction Limited. While job creation and economic development are important, this proposal raises serious concerns regarding the conversion of agricultural land and impacts on local natural heritage that merit careful review.

1. Farmland Loss and Surrounding Agricultural Lands

The subject lands are currently designated as agricultural and lie outside the City of London's Urban Growth Boundary. Converting these productive lands to industrial uses contributes to the ongoing loss of farmland in Ontario. According to recent Census of Agriculture data, Ontario has been losing farmland at a rate of approximately **319 acres per day**, representing a significant, ongoing decline in the province's agricultural land base.

Importantly, the subject parcel is part of a **larger agricultural landscape**. Farmland continues to surround the property to the north, west, and south, forming a contiguous area of productive agricultural land. Approval of industrial development here could set a precedent and create pressure for further conversion of nearby farmland, eroding the rural and agricultural character of the area.

2. Natural Heritage Features and Environmental Risks

Dingman Creek crosses the southern portion of the site, forming a natural heritage corridor. While no development is proposed within the creek corridor and it is intended to be dedicated to the Upper Thames River Conservation Authority, the proximity of industrial facilities raises concerns about stormwater runoff, habitat disruption, and increased impervious surfaces.

In addition to Dingman Creek, the site is within 5 km of other local water systems, including the Parker Drain (east of the site) and the North Thames River branch (~1.5–2 km north), all of which are part of the Upper Thames River watershed. These waterways contribute to local biodiversity, wetlands, and aquatic habitats. Changes in land use, runoff, or stormwater management at *the proposed development site could therefore have cumulative impacts* on downstream water quality and hydrology across this interconnected network. Local wetlands, woodlands, and floodplain areas contribute to biodiversity, water retention, and climate resilience and should be protected.

3. Planning and Transparency Risks

An MZO would override current municipal zoning and allow industrial use on land currently designated agricultural. While there is already an existing business and industrial park in the area, any expansion should proceed with great care given the potential environmental, hydrological, and agricultural impacts described above. The proposal's Phase 3 lacks detailed

plans, leaving open questions about how future development south of Dingman Creek could impact sensitive natural areas. Decisions to amend land use through MZOs must be transparent and supported by rigorous environmental assessment.

4. Ontario Examples of Environmental Damage

There are several Ontario precedents where industrial development has caused lasting environmental harm, illustrating the risks of allowing new industrial uses near sensitive lands. For instance, the mercury discharge from a plant in Dryden contaminated waterways and fish in the English-Wabigoon River system, with ongoing health and ecological impacts on local Indigenous communities. Historic operations of a nickel refinery in Port Colborne left soils contaminated with heavy metals, affecting property, health, and ecosystems. In Sarnia's "Chemical Valley," petrochemical air emissions have contributed to documented environmental and community health concerns. More recently, industrial and warehouse development near Caledon has raised alarms about alterations to waterways and impacts on endangered species, demonstrating how even regulated developments can affect natural heritage and watercourses. These examples underscore that ecological risks from industrial development are real and measurable, not hypothetical.

5. Recommendations

- Require a comprehensive environmental impact assessment addressing water quality, habitat integrity, and ecosystem function prior to approval.
- Implement robust stormwater, erosion, and runoff controls to protect Dingman Creek and connected systems.
- Prioritize development within existing built-up areas or previously serviced industrial lands to reduce loss of farmland.
- Ensure public, Indigenous, and conservation authority consultation is meaningful and ongoing throughout the review process.
- Redesignate the subject lands for sustainable growth practices within the City of London Official Plan, or decline the MZO, recognizing it is in the public interest to preserve these productive agricultural lands for current and future generations.

In closing, while economic opportunities are important, they should not come at the cost of diminishing Ontario's agricultural land base and degrading natural heritage features without thorough review and mitigation. The ongoing provincial loss of productive farmland underscores the urgency of protecting these lands for food security and sustainability.

Thank you for considering these comments.

Sources / References

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