

**To:** Members of the Sustainable Peterborough Coordinating Committee (SPCC)  
**From:** Future of Food & Farming Working Group (FFFWG)  
**Meeting Date:** January 23, 2020  
**Subject:** update

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**Purpose** A report to advise the SPCC on the bimonthly activities of the Sustainable Peterborough' FFFWG

**Recommendation - FYI**

**Budget and Financial Implications:** (we do not have financial resources only in-kind supports from partners)

**Details:**

Major project is planning the FFFWG's 5<sup>th</sup> summit to be held on March 2, 2020.

See notes from last meeting re

- completion of comments on farm diversification started in 2018
- continued monitoring of the County and City Official Plans
- planned partnership with Peterborough Public Health re national food policy and the food charter
- ongoing development of promoting local food process: (received a grant that has not been announced yet - we are creating an up-to-date local food website, two value chain videos, and doing a local food networking event in March - held by Farms at Work for the group)
- working with Trent University on various research initiatives

# Sustainable Peterborough Future of Food & Farming Working Group (FFFWG)

## Notes

**January 23, 2020**

**Present:** Dawn Berry Merriam, Pat Learmonth, Judy Coward, Linda Slavin, Jill Bishop, Pat Learmonth, Gabi Dragomir, Melissa Johnston, Michael Classens (by phone), Lauren Kennedy, Adam Mclaughlin

**Guests:** Stephanie Pick; Anna Currier, Climate Change Coordinator, Township of Selwyn; Alex Campagnolo

**Regrets:** Bryan Weir, Dave Cavanagh, Marion Burton, Cheryl Lyon, Brad Appleby

**New Member:** Carolyn Puterbough, Agriculture and Rural Economic Development Advisor  
Covering Durham & York Region, City of Kawartha Lakes and County of Peterborough  
Business Development Branch, Ontario Ministry of Agriculture, Food and Rural Affairs

### Business Arising from the last meeting

- Membership list update: Working Group bios have been sent to Sustainable Peterborough to appear on the website
- Peterborough Farm Stewardship Report completed– Farms at Work
- Letter to OSM Update: Township of Otonabee-South Monaghan Proposed Policy Changes as it relates to Agricultural Diversification and On-farm Diversified Uses (see below for discussion)

### Notes from last meeting

- Approved as circulated,

Letter to OSM Update: Township of Otonabee-South Monaghan Proposed Policy Changes as it relates to Agricultural Diversification and On-farm Diversified Uses

- Judy, Pat and Dawn have been developing a letter (see attached)
- The letter builds on the data and research of the FFFWG over the past seven years and the goal of the Sustainable Peterborough Plan re “the community goal for food and agriculture for 2036 is “we will feed ourselves sustainably with local, healthy foods”. It strongly adheres to the strategy to “Maintain adequate farmland availability to support our sustainable agricultural needs.”
- The letter documents the amount of land that has gone out of production since 1976 and the reduction of the number of farmers in this county.

It poses the following questions:

- Is it farmers that are benefitting from the diversified use? Or non-farming farmland owners that are renting out their land? How is this determined?

- What is the level of investment proposed? If expensive infrastructure improvements are made to the property (regardless of how small the acreage that is covered by those improvements), will the price of the farmland be beyond the means of future farmer purchasers to justify for farming?
- Is the infrastructure saleable as agricultural infrastructure down the road or has the use of the land been fundamentally changed? What would happen if the infrastructure is no longer being used by the owner and is rented out to a third party to operate?
- Under what circumstances would site-specific zoning applications be permitted that are not in compliance with the zoning bylaws related to diversified uses on farms?
- Will local land use planning regulations encourage jurisdiction shopping by buyers of farmland in our County, and frustration for farmers due to a patchwork of bylaws?
- Do we have a community-wide vision?

**Comments on proposed OSM “On-Farm Diversified Uses” Official Plan Amendment policies, and Zoning By-law Amendment regulations** are organized as follows:

1. The proposed process of permitting a wide variety of “On-farm Diversified Uses”
2. Township’s Approval Process is not known
3. Protection Offered by a Site Plan Control Agreement
4. No ability for the public to have input on a proposed “On-farm Diversified Use”. The Uses proposed are major changes of use which may have significant impacts on neighbouring property owners.
5. The Opportunity to provide “Limited Accommodation” as an “On-farm Diversified Use”
6. Maintain requirements to meet MDS (Minimum Distance Separation) requirements in all circumstances
7. Require the “Non-Farm Diversified Uses” to meet parking requirements as required in the Township’s Zoning By-Law for similar uses in other zones.

**Discussion ensued re**

- Implications of the proposed on-farm diversified uses re allowing additional accommodation units over and above guidelines for bed & breakfast, parking to accommodate large events, experiences from other communities which have allowed diversified uses
- **Consensus** to approve the content/intent of the letter as discussed.

**See also: Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas Publication 851**

<http://www.omafra.gov.on.ca/english/landuse/facts/permitteduseguide.pdf>

- Nothing to report from the County process
- Brad provided the following update via email:

“We received a new draft of the Official Plan document from our planning consultant last week. This version attempts to respond to the various comments we received throughout last summer and fall. We are currently going through the document and may not make it publicly available for a few weeks.

At the November meeting I advised that we were waiting for comments from the province on our land needs assessment. We are still waiting for those comments. Consequently, we have not adjusted the mapping in the draft OP to identify lands for future development to 2041 beyond those lands that already have approved subdivisions on them. Once we receive comments from the province, we will work with the landowner community to determine which lands are frozen and which lands are designated for development. For the time being, all of the lands in question are shown as Rural Transition Area in the draft OP.”

**General work plan items, continued**

Summit planning update

Melissa and Lauren reported:

- **Venue:** Knights of Columbus is booked, and the County is kindly covering the cost.
- **Date:** Decision made: Monday March 2<sup>nd</sup>, 3-6pm
- Overarching statement of purpose: What actions are needed to build a cohesive local food system in order to feed the next 7 generations?
- There will be 5-6 double tables. Invitations will be made for each of the following areas with 6-8 people invited from each:
  - First Nations
  - Community Advocates
  - Producers and value chain
  - Food Security
  - Politicians
  - Institutional supports (Education, OMAFRA, FM, PKED)
  - discussion categories to consider:
    - food literacy and education
    - food insecurity (urban and rural)
    - building capacity in the local food system
    - stewardship of agricultural lands/growing thriving farms
    - food infrastructure, land use, regulation and policy: support or hindrance?

Discussion re

1. opportunity to have transcription services provided by Trent but recognizing that there will need to be detailed notes taken for the final discussion session of the day.

2. do we need questions re how do we address the funding gaps and what type of governance structure is needed to support a comprehensive food system?

**Update: PFAN (Lauren)**

The latest food basket report has been released for 2019 Here is the link to the limited incomes report: see link: <https://www.peterboroughpublichealth.ca/wp->

<content/uploads/2020/01/2019-Limited-Incomes.pdf>

- documents that the cost of food has risen but the key message is that it is not that food is more expensive but that people's income has not kept pace.
- In partnership with Durham prepared a letter of response to the national food policy
- **Consensus:** Lauren will bring the response to the FFFWG for review and so that a letter of support can be provided by the WG and discuss what is the role of the national food policy to support local food and farmers?

**Updates from Task Forces**

- **Land Use Task Force: Task:** nothing to report but messages in the OSM letter are built around that research
- **Urban Ag Task Force:** nothing to report
- **Local Food Promotion Task Force:** RED funding has been procured. Farms at Work has hired a co-ordinator to organize session for March 24<sup>th</sup> re bringing buyers and sellers together at the Douro Community Centre. Preliminary work completed on website connecting public with local food. Will be seeking sponsorships for website. Undertaking a series of videos on value chain and how food gets from farm to plate.

**Peterborough Ag Roundtable**

- Upcoming Ag Economic Development Roundtable scheduled for February 5. Farmers from all commodities, decision makers, representatives of 8 townships, provincial and federal representatives have been invited

**Trent SSHRC project: community research opportunities (Michael Classens)**

Update: Trent SSHRC project – community research opportunities (Michael Classens)

- Michael spoke to the draft application that is based on the meetings he hosted in September and December.
- Potential to wait to submit the application until May and then build on the outcome of the March summit.
- The intent of the application is to foster a regional local discussion on food and how we address the issues related to the system and enable Trent to provide research and teaching supports.
- SSHRC funding allows the project to be somewhat flexible
- **Consensus** to submit the application in February
- **Action:** Michael to circulate the proposal again as well as the template for letters of support

**Food Charter**

- Lauren stated that discussions are underway re Indigenous Food Sovereignty
- There is room to re-open the Food Charter and seek more input from eg the Ag Roundtable on aspects affecting the agricultural sector

**Sustainable Ontario opportunity**

- See <https://sustainontario.com/2020/01/22/sustain-ontario-seeking-community-to-collaborate-on-otf-seed-grant-application-for-social-system-mapping-pilot-in-your-region/> Sustainable Ontario has put a call out asking for communities that may be interested in Sustain Ontario is looking for a community to collaborate on an **OTF Seed grant** application in the Connected People stream, with the priority outcome 'Diverse groups work better together to shape community'.

The project will a pilot project to map the relationships, organizational priorities, funding priorities and interests of a wide range of community food system actors within a single region. Using a social system mapping process, the pilot project will encourage new relationships and strengthen existing ones, while identifying missing voices and opportunities to initiate collaborative projects, and providing an example to other communities.

The intent will be to 1. identify relationships and connections within the community as well as to shed light on who is missing from current food system conversations, 2. provide opportunities for relationship building, 3. enable the community to initiate collaborative food system projects that could leverage each other's assets, and 4. share learnings to facilitate the use of social mapping in other communities.

- **Consensus:** to put our community forward as being interested in being that community.

## Updates

- Dawn reported that the first meeting of Sustainable Peterborough's Plan Refresh committee was held this week and planning is underway to move the process along.
- In Cheryl's absence Dawn reported there is a movement locally toward Social Procurement as an avenue of making the power of municipal purchasing work for social/community/local businesses good. Councillor Akapo requested a Staff Report on this due end of March. It's all very early stages but wondering eventually how it would translate to the Food sector (especially in City) and Farming sector in County.
- Pat reported that Farms at Work is planning a session for February 11 re farm work jobs to be held at Trent. Building on WFD Boards' report on agricultural work in the region. Bringing together job seekers with potential employment providers.
- Jill reported that Seedy Sunday will be March 15<sup>th</sup> and this is the 15<sup>th</sup> anniversary.
- Gabi reported that PKED is currently evaluating the feasibility to develop a Local Food Aggregation/Distribution Centre (Local Food Centre) in Peterborough County. The Feasibility and Business Case Study will assess the need to establish a wholesale marketplace that will facilitate the aggregation, storage and distribution of locally produced food to wholesale buyers in the Eastern Ontario region. This process involves gathering opinions, ideas and visions through focus group discussions from food producers, processors, wholesalers, retailers, distributors, educational institutions and other stakeholders involved in the Eastern Ontario food ecosystem. A series of focus groups are underway and a number of representatives from FFFWG have participated. This process involves gathering opinions, ideas and visions through focus group discussions from food producers, processors, wholesalers, retailers, distributors, educational institutions and

other stakeholders involved in the Eastern Ontario food ecosystem.

- Carolyn provided further information on her role with OMAFRA and stated that Heather has taken on a new position. Carolyn serves Durham, York, Kawartha Lakes and now Peterborough. She reported on the next round of RED applications and upcoming Agricultural Ec Dev training session by OMAFRA with the Roundtable.
- Judy reported on an upcoming event in Keene whereby a dinner is being planned which will be based on a 1977 local cookbook. The community dinner will be on February 29 and proceeds will go to the local food bank.
- Adam spoke to the work he is undertaking on Farmers Markets. See the following websites for more details:

<https://pub-peterborough.escribemeetings.com/filestream.ashx?DocumentId=25440>

Article from Examiner that (mis)reports on the findings and which I take issue with in my thesis...

<https://www.thepeterboroughexaminer.com/news-story/9583292-shoppers-want-local-goods-at-farmers-markets-city-survey-finds/>

Link to the community respondents survey

<https://pub-peterborough.escribemeetings.com/filestream.ashx?DocumentId=25441>

link to the survey for vendors (slightly different)

<https://pub-peterborough.escribemeetings.com/filestream.ashx?DocumentId=23955>

- **Guest** Anna Currier, Climate Change Coordinator, Township of Selwyn. She described some of the projects being undertaken re working with local schools, community gardens, working with Nourish, investigating digesters for back yards, backyard chicken pilot

**Next Meeting**

Tuesday, March 31 at 1 p.m. in Committee Room at the County Courthouse

To: The CAO and Council of Otonabee South Monaghan Township

From: Sustainable Peterborough's Future of Food & Farming Working Group

Date: January 28, 2020

Regarding: **"Comments on proposed OSM "On-Farm Diversified Uses" Official Plan Amendment policies, and Zoning By-law Amendment regulations."**

Sustainable Peterborough's Future of Food & Farming Working Group has been following the township's interest in farm diversification. We congratulate the Township for taking an early lead on researching and investigating the best way forward on this challenging topic.

At a recent meeting of the Working Group, it was agreed that we should comment on the township's proposed direction, based on our eight years of extensive research and community consultation on how to support agriculture and food in our community. We include overarching comments, as well as the attached more specific **"Comments on proposed OSM "On-Farm Diversified Uses" Official Plan Amendment policies, and Zoning By-law Amendment regulations."**

Our research supports the Ministry of Agriculture, Food and Rural Affairs priorities in introducing the concept of diversified uses on one hand – but also introduces a note of caution.

### **1. Comments on the priority of protecting farmland for farmers**

The Permitted Uses objectives, criteria and principles, as outlined in OMAFRA Publication 851, recognize that agricultural land is a non-renewable resource. They emphasize the importance of 'maintaining the land base for agriculture (PPS POLICY 2.3.1)' and 'regard is given to long-term (multigenerational) impact on *prime agricultural areas*' (Pub 851 p. 3).

Local research has confirmed that protection of agricultural land for farming in Peterborough is a priority with the community, and that land in farming is declining and has been doing so for many years.

The Future of Food and Farming Working Group of Sustainable Peterborough has based its work on the 2012 Sustainable Peterborough Plan. In that Plan, the community goal for food and agriculture for 2036 is "we will feed ourselves sustainably with local, healthy foods". Three strategies were identified in the Plan:

- Maintain adequate farmland availability to support our sustainable agricultural needs.
- Facilitate the production, storage, processing, distribution, and marketing of local, healthy food.
- Encourage farmers to practice good environmental stewardship.

In 2018 we prepared a report based on the proceedings of our fourth summit: **"Planning Locally for the Future of Food & Farming"**. Here are a few of the observations about Peterborough County farms and farmers presented at the summit by Steve Duff, Chief Economist, Ontario Ministry of Food & Rural Affairs (OMAFRA).

- Compared to the provincial level, Peterborough County has seen a more rapid:
  - Loss of total farm numbers, total farm area and total land in crops
  - Reduction in the number of farm operators working full-time on the farm
  - Increase in farms less than 10 acres and between 1,100 and 1,600 acres
- Characteristics of farmland in Peterborough County like many parts of central and eastern Ontario has meant that large scale agriculture is not the norm:
  - 27% of farmers work full-time on the farm compared to provincial average of 49%
  - 21% of farmers work full-time off the farm compared to provincial average of 27%
  - Proportionally more farms under 69 acres

- 72% of farms have under \$50,000 in gross farm sales compared to provincial average of 50%
  - Proportionally more beef and small livestock farms and less fruit and vegetable farms
- In 2016, the average value of land and buildings per acre was \$5,071 - up 89% from 2006, as compared to the provincial average of \$9,580 in 2016.

The Sustainable Peterborough Working Group on the Future of Food produced a significant study in 2014 entitled **Farmland, Farmers and Food Production in Peterborough County**, which has since been updated to include 2016 Census of Agriculture data.

To read the full report go to: “**Farmland, Farmers and Food Production in Peterborough County**”  
<https://sustainablepeterborough.ca/about-us/working-groups/future-of-food-and-farming-working-group/>

The report documented that

- 92,000 acres of farmland in Peterborough County went out of production between 1976 and 2016
- in 25 years, the number of farm businesses decreased by 34% and the number of farmers has been reduced by 35%
- it is projected that by 2036 there will be a further 26 % decrease in the number of farmers

The price of farmland is the single largest barrier to new farmers wanting to begin farming.

Moreover, the study includes unique research into the amount of land needed to feed just the population of the County. Here is the conclusion:

‘... a 2007 study in New York State found that it took just over an acre to feed a person an average diet including modest amounts of meat (across all ages). It is projected that Peterborough County and City will have about 177,000 residents by 2036. Coincidentally, in 2011, the number of farm acres available in the County was about 175,000. If New York State’s ability to produce food is fairly comparable to Peterborough County’s, this suggests that the 2011 land base available here, if fully conserved and used optimally for local food production through to 2036, might be able to support the projected 2036 population. However, it is unlikely that production yields in Peterborough are quite as high as those in New York, due to climatic differences.’ (p.18)

After the writing of that report, another 25,000 acres went out of production by the time of the 2016 Census. This trend probably continues today. We may not have enough acres, using current farming practices, to feed our own population, let alone contribute to feeding those outside our Peterborough borders.

Where does this lead us? The primary reason that farmland is going out of production and farmer numbers are declining is the economics of farming. Hence the effort to increase the options for farmers to diversify their operations and support farm incomes. New farmers are unable to enter the farming business largely because the cost of land is already prohibitive. It is imperative not to exacerbate these problems.

Peterborough area decision-makers should therefore look to the *long-term* and assess what impact today’s decisions will have on the future of each piece of agricultural and rural land. It is not enough to ask whether current owners are satisfied with the proposed changes.

## **2. Comments regarding the need for a County Planning Process to consider coordinating the creation of “On-farm Diversification Uses” policies, permissions and development criteria, with other Municipalities**

Our final concern is that there are eight townships and two First Nations within the geographical area we call Peterborough County. The issues at stake affect everyone and should be considered with input from the

agricultural community as a whole, as well as urban residents who have contributed to community priorities. The “on-farm diversified uses” permissions and assessment and development criteria for these uses should apply similarly to agricultural and rural properties in all municipalities located in Peterborough County.

It will create frustration down the road if a farmer is prohibited from doing something that his neighbour across the road can do, because he lives in another municipality. Farmers do not pick up and move their farms. A patchwork approach will only favour non-farmers deciding where to purchase based on opportunities available in specific townships – ie ‘jurisdiction shopping’.

### **3. Conclusions and Questions**

Increasing economic opportunities for the farm community is an admirable goal. However, there are many pitfalls to loosening land use controls that in fact could result in the continued erosion of the farmland base, and loss of farmers. If Peterborough as a whole is to benefit from the new PPS provisions for expanded “on-farm diversified uses”, we have the opportunity to learn from the experience of other jurisdictions and make the right decisions from the outset. Based on the above information, we have the following questions and request clarification on the Township’s proposed on-farm diversification approval process.

Here are some important questions that should be considered:

- Is it farmers that are benefitting from the diversified use? Or non-farming farmland owners that are renting out their land? How is this determined?
- What is the level of investment proposed? If expensive infrastructure improvements are made to the property (regardless of how small the acreage that is covered by those improvements), will the price of the farmland be beyond the means of future farmer purchasers to justify for farming?
- Is the infrastructure saleable as agricultural infrastructure down the road or has the use of the land been fundamentally changed? What would happen if the infrastructure is no longer being used by the owner and is rented out to a third party to operate?
- Under what circumstances would site-specific zoning applications be permitted that are not in compliance with the zoning bylaws related to diversified uses on farms?
- Will local land use planning regulations encourage jurisdiction shopping by buyers of farmland in our County, and frustration for farmers due to a patchwork of bylaws?
- Do we have a community-wide vision?

We encourage Otonabee-South Monaghan to embrace a collaborative community-wide discussion at this stage.

Once again, we do appreciate the efforts made by the Township, which have provided the opportunity for this discussion. We look forward to continuing the conversation.

Respectfully submitted,

Sustainable Peterborough’s Future of Food & Farming Working Group

(See attachment for specific comments on the current proposals.)

**Comments on proposed OSM “On-Farm Diversified Uses” Official Plan Amendment policies, and Zoning By-law Amendment regulations**

Having reviewed the “Township of Otonabee-South Monaghan Proposed Policy Changes as it relates to Agricultural Diversification and On-farm Diversified Uses” prepared by EcoVue Consulting Services Inc., November 2019, with reference to the Township’s existing Official Plan, and Comprehensive Zoning By-Law, the Future of Food and Farming Working Group has the following comments to make regarding the proposed amendments to the Township’s Official Plan and Zoning By-law documents.

The document we have reviewed is clearly a draft document that has not been written in an actual amendment format, and which states in a number of places that more work needs to be completed before specific sections of the amendments can be completed ie. “O.P. Section 5.8.1 Definition of Agricultural Areas”, and “ZBL Section 4.4 BED AND BREAKFAST ESTABLISHMENTS – Revisit”; among others.

Consequently we would be very pleased to review the final draft of the proposed Official Plan and Zoning By-Law Amendments pertaining to permitting “On-farm Diversified Uses” in the Township of Otonabee-South Monaghan.

The Township’s Official Plan and Comprehensive Zoning By-Law currently include permission and criteria to allow “On-farm Diversified Uses” to occur in the Township’s “Agricultural” and “Rural” designations and zones. These amendments propose additions and changes to these existing policies and regulations.

At this time we are providing our broad comments under the five headings identified below:

**1. The proposed process of permitting a wide variety of “On-farm Diversified Uses”**

Based on our review of the documents presented, it appears that the Township is proposing to address the issues of permitting “On-Farm Diversified Uses” within the “Agricultural” and “Rural” designations and zones in the Township’s Official Plan and Zoning By-Law documents, in much the same way as it treats “Accessory Buildings and Uses”. The policies and regulations proposed would permit the identified “On-Farm Diversified Uses” to generally be permitted to locate anywhere in the “Agricultural” and “Rural” designations and zones, with little regulation of what occurs in those locations other than the general “On-Farm Diversified Use” policies and regulations as proposed to be included in the Township’s Official Plan and Zoning By-Law.

Proposed O.P. policy 3.29.1 “Establishing an On-farm Diversified Use” requires that a person wishing to establish an “On-Farm Diversified Use” must pre-consult with the Municipality and provide a “clearly written business plan for the development of the proposed On-farm Diversified Use, including the type of use and proposed activities both initially and within a five-year planning horizon.”, and “A site sketch, (inclusive of items a) through n)) must accompany the written submission.”

The final paragraph of proposed O.P. policy 3.29.1 states that “Where the use meets the intent of this Plan and provisions and regulation of the Zoning By-Law, further approvals under the Planning Act will not be required.”

**Township’s Approval Process is not known**

Proposed Official Plan policy Section “3.29.2 Municipal Considerations” subsection “g) Administration”, states that “This policy shall be administered by the Zoning Administrator, ....”, however it does not indicate what constitutes approval for the applicant to proceed. Based on the reading of this section it would appear that the application is not reviewed by Council. Does the applicant receive a letter from the “Zoning Administrator” indicating that they may proceed to develop/create their “On-farm Diversified Use”, are the business plan and site sketch signed, dated and kept on file by the municipality? Although proposed criteria for the “On-farm Diversified Uses” are included in the draft document, how the applicant receives approval to proceed is not indicated, although proposed Section 3.29.2 g) indicates that there is an “Administration” process. If the property owner deviates from the site sketch and the business plan they have submitted, and proceeds to develop a different type of “On-farm Diversified Use”, what action will be taken by the Municipality?

As noted above, proposed Official Plan policy Section 3.29.1 last paragraph states; “Where the use meets the intent of this Plan and provisions and regulations of the Zoning By-Law, further approvals under the Planning Act will not be required.”

### **Protection Offered by a Site Plan Control Agreement**

The “On-Farm Diversified Uses” proposed are many and varied and several have the potential to attract large crowds of people. We would strongly suggest that the municipality’s interests, and the interests and potential concerns of both agricultural and non-agricultural neighbours abutting and within close proximity to these “On-farm Diversified Uses”, would be best served by requiring the property owner of the “On-farm Diversified Use” to enter into a “Site Plan Control Agreement” with the municipality. A “Site Plan Control Agreement” can include all of the detailed site specific issues that are identified as being required to be included on the site sketch, and as an “Signed Agreement” will serve to confirm and ensure that the interests and concerns of the property owner, and all of those affected by the “On-Farm Diversified Use”, are protected.

Entering into a Site Plan Control Agreement for “On-farm Diversified Uses” is a best practice suggested by the PPS, Publication 851, page 29, that can “be used to ensure that new uses fit in with the agricultural character of the area and are compatible with surrounding agriculture.”

### **2. No ability for the public to have input on a proposed “On-farm Diversified Use”. The Uses proposed are major changes of use which may have significant impacts on neighbouring property owners.**

The Township’s current and proposed review process to consider “on-farm diversified uses” proposals does not require that the neighbouring property owners be informed of the proposal, or consulted with respect to the impacts it may have on their properties. The PPS, Guidelines, Publication 851, page 45, states, “Conflicts between farmers and nearby on farm diversified uses can often be avoided through open communication with neighbours and with the use of best management practices...”

We recommend that consultation with the neighbouring property owners be made part of the Township’s review process when it considers an application for an “on-farm diversified use.

### **3. The Opportunity to provide “Limited Accommodation” as an “On-farm Diversified Use”**

The proposed Official Plan and Zoning By-Law Amendments refer to permitting “limited accommodation” as part of the permitted “Agricultural-based Rural Tourism Uses”, which may be associated with hospitality services such as farm stays, which are proposed to be included as a type of “On-farm Diversified Use”.

**The PPS Publication 851 does not identify “accommodation”, other than that required for “full time farm labour” as a permitted “On-farm Diversified Use”.**

The associated proposed Zoning By-law Amendment includes a proposed new definition for “Limited On-farm Accommodation” as follows, Definition (Section 3) for “Limited On-farm Accommodation means overnight accommodation that is available to farm visitors for short-terms stays on a farm property that is in active agricultural production. The accommodation is not intended to be available to the travelling public. Accommodation may include temporary structures such as yurts, bell tents, shepherd’s huts, or similar.” The term “limited” is not defined.

The opportunity to include “Limited On-farm Accommodation”, beyond “Bed and Breakfast” accommodations, which are currently permitted in “Agricultural” and “Rural” Zones, is a huge concern for surrounding farm operations. As the owner of an “On-farm Diversified Use” invests significant amounts of money in facilities such as accommodation, the property becomes a commercial non-farm operation focused on the Diversified Use, rather than an actual agricultural or rural operation with a secondary “On-farm Diversified Use.”

**The PPS (Provincial Planning Statement) Guidelines, Publication 851 does not recognize “Limited Accommodation” as a permitted “On-farm Diversified Use”. We recommend that the proposed Amendments to the Township’s Official Plan and Comprehensive Zoning By-Law not include permission to provide accommodation as an “On-farm Diversified Use” beyond what is permitted as a “Bed and Breakfast” use, and that such commercial accommodation requests be subject to the Township’s Official Plan policies and Zoning**

**4. Maintain requirements to meet MDS (Minimum Distance Separation) requirements in all circumstances.**

“MDS I and II setbacks apply in rural areas to both rural lands and prime agricultural areas in accordance with the PPS. MDS I applies to proposed new non-farm development in proximity to existing livestock facilities. MDS II applies to proposed new or expanding livestock facilities in proximity to existing or approved non-farm development.” PPS Guidelines Publication 851, page 44.

Proposed policy Section 5.8.3 c) “Agricultural”, and proposed policy Section 5.9.3 c) “Rural”, of the proposed Amendments to the Township’s Official Plan, state as follows: “Notwithstanding Sections a) and b) of this section, On-farm Diversified Uses are generally not required to comply with MDS criteria, as described in Section 3.10.1 of this Plan.”

Section 5.8.2 c) viii) and Section 5.9.2 e) viii) of the proposed new “Agricultural” and “Rural” Official Plan policies would permit “special event facilities such as farm weddings venues, personal health and wellness centres and educational facilities” to locate as “On-Farm Diversified Uses” in “Agricultural” and “Rural” designations and zones, but would not require them to meet the requirements of MDS for livestock facilities located on the owners’, or the neighbours’, properties. As examples, these types of uses are highly sensitive to the odours produced by all types of livestock facilities, and the MDS (Minimum Distance Separation formula) was created by the Province to ensure that the continued and potentially expanded operation of established livestock facilities are not impeded by non-agricultural uses and activities.

Proposed Official Plan “Section 3.8.10.1 MDS Setbacks for On-Farm Diversified Uses” suggests that MDS setbacks “may” under various circumstances be required, is not sufficient to protect an owned or neighbouring farming operation that has a significant financial investment in its livestock buildings and facilities. Additionally, neighbouring agricultural property owners may have purchased their properties on the understanding that they are permitted to construct livestock facilities on that property, but then find that due to a neighbour’s decision to develop an “on-farm diversified use” on their property they are now prohibited from building a livestock facility.

The Township’s proposed removal of the requirement that “on-farm diversified uses” meet the requirements of the MDS, does not meet PPS Policy 2.3.3.1, that “Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations.”

**5. Require the “Non-Farm Diversified Uses” to meet parking requirements as required in the Township’s Zoning By-Law for similar uses in other zones.**

Proposed Section 4.25.8 “On-Site Parking” of the Municipality’s Zoning By-Law states that “Agricultural Uses, Agriculture-related Uses and On-farm Diversified Uses are not subject to the provisions of Section 4.25.1-4.\*.7 of this By-law.”

All of the “Non-Farm Diversified Uses” proposed in the subject amendments will generate vehicular traffic and the need for on-site parking. Proposed Official Plan Section 3.29.1 i) “Establishing an On-Farm Diversified Use, subsection i) requires that “detail regarding areas proposed for parking (number, type, size),” be included on a site sketch that must accompany the written submission that is part of the Municipality’s process to establish an On-farm Diversified Use.

Once again some of the permitted “On-farm Diversified Uses” will generate significant traffic and it is essential that sufficient parking be provided to accommodate those attending the activities and events hosted by these facilities. Removing the requirement that “on-farm diversified uses” not meet the parking requirements of the Township’s Comprehensive Zoning By-Law will definitely generate conflicts with neighbours, and potentially

impede the flow of traffic on public roadways.