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Planning Justification Report

Official Plan and Zoning By-Law Amendment

3610 West Corner Drive

Municipality of North Middlesex

County of Middlesex

Date:

October 2024

Prepared for:

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1.0 Executive Summary and Report Framework

Rita Jabbour, RPP, has been retained by Christin Gokstorp (the “Applicant”) to prepare a Planning Justification Report (PJR) **in support** of an application for Official Plan and Zoning By-Law Amendment (the “OPA” and “ZBA”) for the agricultural lands located at **3610 West Corner Drive** (the “Subject Lands”) in the Municipality of North Middlesex (the “Lower Tier”), in the County of Middlesex (the “Upper Tier”).

The Applicant is requesting a site-specific amendment to the North Middlesex Official Plan and the North Middlesex Zoning By-Law, By-Law No. 35 of 2004, as amended, to permit the following supplementary uses on the Subject Lands:

- One (1) detached Additional Residential Dwelling Unit that is independent and physically separated from the principle dwelling unit on the Subject Lands and used for the purpose of accommodating one (1) **permanent** Additional Residential Dwelling Unit and which may be used for the purposes of boarding on-farm labourers.
- On-Farm Diversified Uses (OFDU) and Agri-Tourism uses, specifically, the development of farm vacation suites, retreats, and recreational opportunities that promote the enjoyment, education and activities related to the on-site farming operation.

The Lower Tier is the approval authority for the ZBA. The Upper Tier is the approval authority for the OPA.

The OPA and ZBA will add the specific policy and regulatory framework for the proposed uses. An application for Site Plan Control (SPC) Approval is also required for the development of the buildings and structures associated with the OFDU/Agri-Tourism Use. An application for SPC approval, which will include a servicing brief and detailed site plan, will be submitted at a later date.

This PJR includes the following components:

- An introduction and general description of the Subject Lands, surrounding uses and existing conditions;
- A summary of the intended uses for the Subject Lands including the proposed amendments; and,

- An assessment of the proposal relative to the framework of planning policies and development regulations applicable to the Subject Lands.

The following documents were primary references in undertaking the Planning Analysis:

- Provincial Planning Statement, 2024 (PPS, 2024)
- Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas (Ministry of Agriculture, Food and Rural Affairs, Publication 851, 2016)
- Middlesex County Official Plan (2023)
- North Middlesex Official Plan (Office Consolidation Date, April 2024)
- North Middlesex Zoning By-Law No. 35 of 2004, As Amended (Office Consolidation Date, April 2024)

It is my professional opinion that the proposed applications for the OPA and ZBA have regard to matters of Provincial Interest as described under Section 2 of the Planning Act, are consistent with the Provincial Planning Statement (2024), and conform with the County of Middlesex Official Plan and North Middlesex Official Plan.

It is therefore my professional opinion that the OPA and ZBA should be approved by the respective approval authority.

I hereby certify that this plan/report was prepared by a Registered Professional Planner, within the meaning of the Ontario Professional Planners Institute Act, 1994.

Respectfully Submitted,



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2.0 Introduction

This Planning Justification Report (PJR) has been prepared for Christin Gokstorp in support of an application for Official Plan Amendment (OPA) and Zoning By-Law Amendment (ZBA) for the agricultural lands (herein referred to as the ‘Subject Lands’) legally described as **CONCESSION 7 ECR PT LOT 13**, and municipally known as **3610 West Corner Drive**, and located within the lower tier **Municipality of North Middlesex**, situate in the Upper Tier **County of Middlesex**.

2.1 Site Location and Description

The Subject Lands are located within an **Agricultural Area** on Schedule “A” –Land Use of the Upper Tier Official Plan (2023) and the Lower Tier Official Plan (2024). The Subject Lands are situated on the north side of West Corner Drive Road, just west of McLean Road, and west of the urban settlement area of Ailsa Craig. **Figure 1** of this report illustrates the general location of the Subject Lands.

The Subject Lands have a total lot area of +39 hectares (or +97.16 acres). Approximately +15 hectares (or +37 acres) contains significant natural areas and woodlands. **Figure 2** of this report delineates the natural areas and woodlands existing on the Subject Lands. The Subject Lands are designated General Agricultural (A1) Zone on Map 15 of the North Middlesex Zoning By-Law, By-Law Number 35 of 2004 (the “Zoning By-Law”).

The significant natural areas and woodlands are identified as *Hazard Lands* on Map 15 of the Zoning By-Law and are affected by the Conservation Authority Regulation Limits on Schedule “D”—Natural Hazard Areas of the Upper Tier Official Plan.

The natural areas **are not** identified as environmentally significant features such as provincially significant wetlands and floodplains on Schedule “A” of the Lower Tier Official Plan.

The natural areas are part of the Natural Heritage System on Schedule “C” –Natural Heritage System of the Upper Tier Official Plan.

Approximately +24 hectares (or +60 acres) of the Subject Lands are used principally for agricultural uses, namely, the growing and processing of cash crops and the raising and processing of outdoor free-range chickens, eggs, and ducks.

The Subject Lands contain one (1) existing Single Detached Dwelling associated with the agricultural use and several agricultural (farm) buildings. **Figure 3** identifies the location existing on-site buildings and structures.

The Subject lands **do not** contain mineral, aggregate or petroleum resources.

The Subject Lands are within the Ausable Bayfield Source Protection Plan on Schedule “F” –Source Water Protection of the Upper Tier Official Plan.

The main means of sewage disposal in agricultural areas and, consequently, for the Subject Lands, within the Municipality of North Middlesex, is the septic tank and weeping tile system.



Figure 1. Location of Subject lands

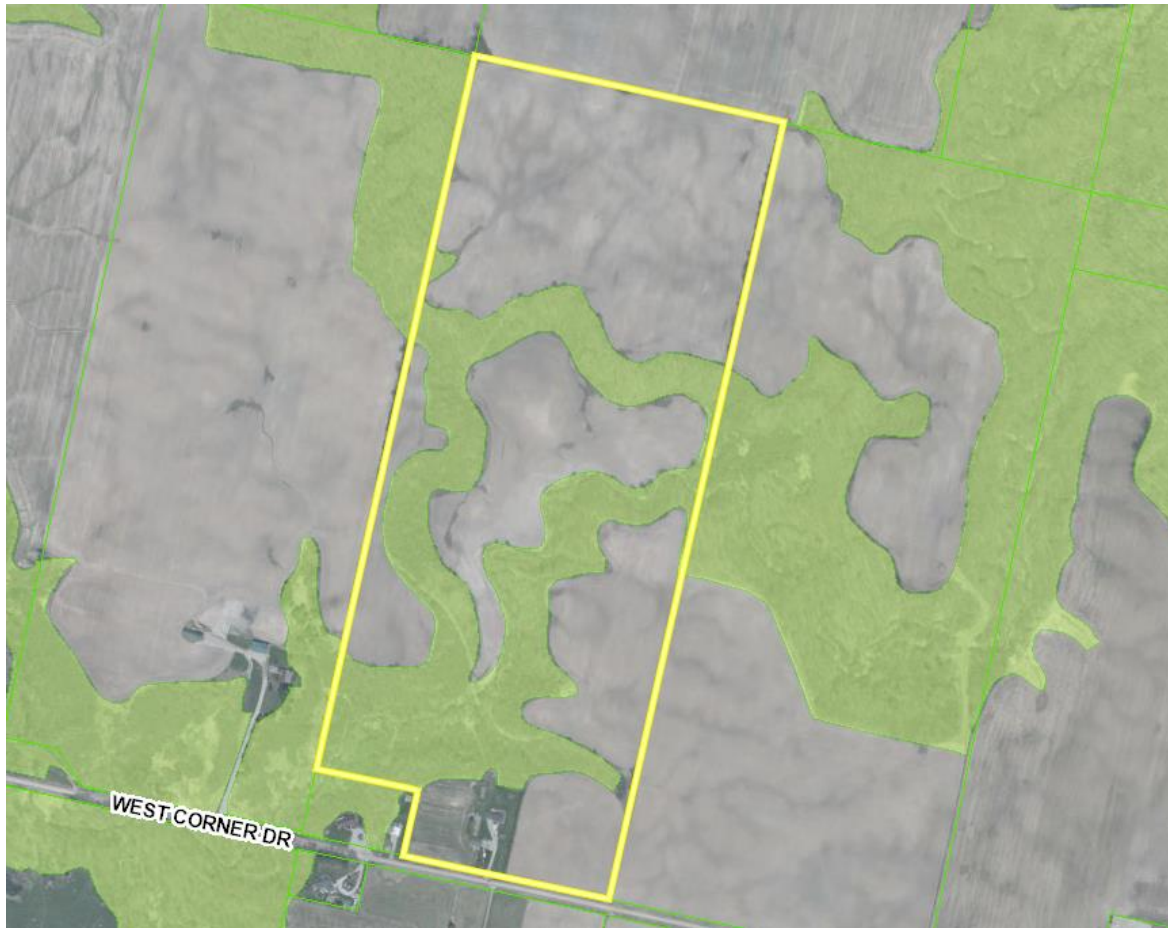


Figure 2. Natural Areas/Woodlands and Hazard Lands delineated in Green



Figure 3. Existing On-Site Buildings and Structures

2.2 Description of Surrounding Land Uses

The development context surrounding the Subject Lands is primarily “Agricultural”.

Under the Zoning By-Law, on Agricultural lands, permitted uses include, but are not limited to: “Agricultural Uses” which includes the growing of crops and raising of livestock; On-farm secondary businesses; and, Second Detached Residential Dwellings accessory to an agricultural use.

The neighbouring development context is summarized in **Table 1.0**.

The zoning classifications of the surrounding lands are identified in **Figure 4**.

Table 1.0 –Surrounding Land Uses

Relative Location	Existing Land Use	Official Plan Designation (County of Middlesex and North Middlesex)	Zone (Bylaw Number 35 of 2004)
To the North:	Agricultural Uses	Agricultural	General Agricultural (A1) Zone
To the East:	Agricultural Uses	Agricultural	General Agricultural (A1) Zone
To the South:	Agricultural Uses	Agricultural	General Agricultural (A1) Zone
To the West:	Agricultural Uses	Agricultural	General Agricultural (A1) Zone
	Thedford Klondike Marsh Flood Plain	Thedford Klondike Marsh Flood Plain	Environmental Protection (EP)

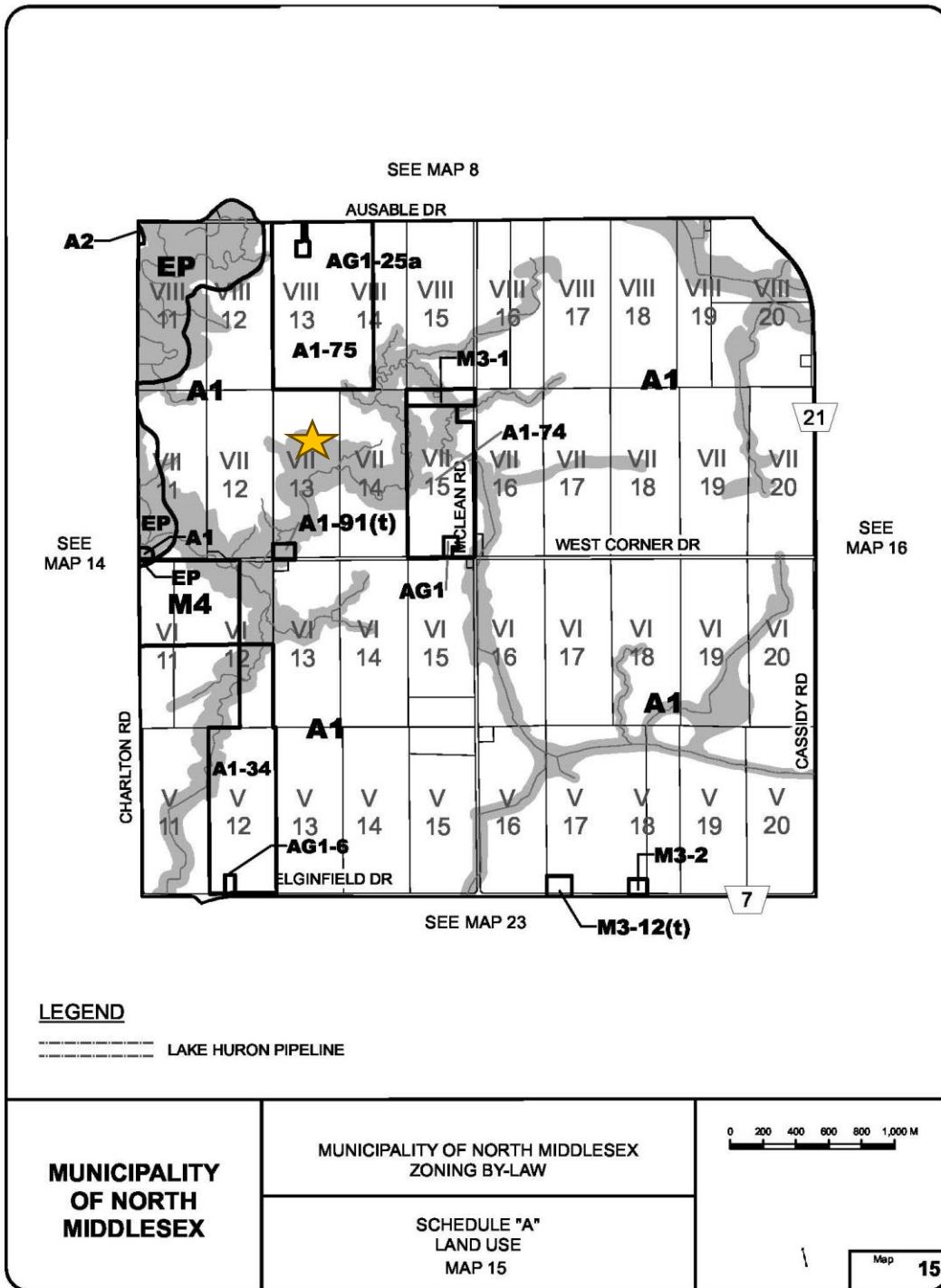


Figure 4. Map of surrounding Zoning Classification

2.3 Description of Proposal

Good Food Farms

The applicant is affiliated with Good Food Farms. Good Food farms operate the farming activities on the Subject Lands but does not own the lands.

Good Food Farms is a women owned and managed social enterprise focused on regenerative farming practices. Their primary products are currently focused on outdoor free range pastured chicken products. They make pre marinated kabobs, seasoned chicken burgers, breakfast patties, honey garlic wings, bone broth, soups, pot pie, quiche, enchiladas, smoked chicken and more. They also do some wholesaling of products but focus primarily on direct-to-consumer sales through farmer's markets.

In addition to share cropping (cash crops), Good Food Farms has also planted perennial fruit and nut trees with a hope to implement a future market garden and a geothermal air greenhouse for off season produce production.

Good Food Farms is focused on whole foods made from real ingredients encouraging customers to know how and where their food comes from. Their belief is that locally produced food from healthy sources is the solution to human health and the health of our planet. As such, the applicant has **immediate** plans to establish an *Agri-Tourism Use* on the lands that is primarily focused on promoting and educating people on the sustainable practices of the farm and the exceptional local whole foods grown in the region, and encouraging people to connect with the natural features of the lands and the area.

On-Farm Diversified Uses (OFDU) and Agri-Tourism Uses

On-Farm Diversified Uses (OFDU) are defined under the Provincial Planning Statement (PPS, 2024) as *uses that are secondary to the principle agricultural use of the property and are limited in area*. A wide variety of uses may qualify as an OFDU based on the PPS definition, as long as they meet the criteria further described in the *Guidelines on Permitted Uses in Ontario's Agricultural Areas* (2016) (i.e. being located on a farm, being secondary to the principal agricultural use of the property, being limited in area, being compatible with agricultural operations).

OFDUs may include, but are not limited to, *Agri-tourism* uses and uses that produce value-added agricultural products (p.48). OFDUs are intended to enable farm operators

to diversify and supplement their farm income, as well as to accommodate value-added and agri-tourism uses in prime agricultural areas.

Agri-tourism uses are defined under the PPS (2024) as *farm-related tourism uses, including limited accommodation, that promote the enjoyment, education or activities related to the farm operation* (p. 39). Farm vacation suites, retreats and recreational uses are examples of Agri-Tourism uses referenced in the *Guidelines* (p. 23, 2016).

Proposed Use

The applicant wishes to establish an *Agri-Tourism Use* by offering short term on-farm stays in three (3) bunkies that will be designed to be off-grid and sustainable in keeping the philosophy of the farm.

Each bunkie will include two levels and will have a total Building Height of 6 metres (or 20 feet). The bunkies will also include an attached greenhouse and an attached covered porch. **Figure 5** provides an illustration of the proposed bunkies.

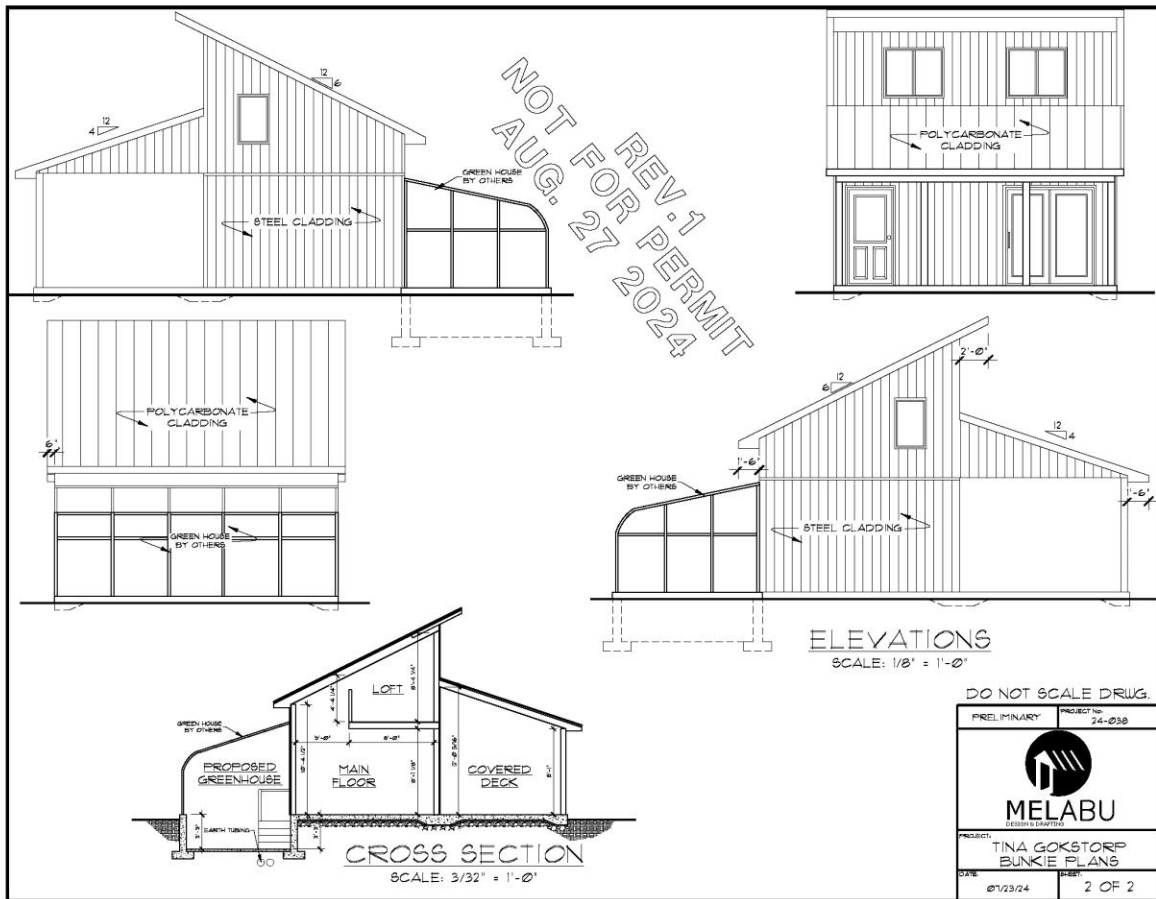


Figure 5. Preliminary Drawings of Proposed Farm Vacation Suites (Bunkies)

The total footprint for each bunkie including the greenhouse and covered porch will vary depending on the model but will generally range in size from 72.46 square metres (or 780 square feet) to 92.9 square metres (or 1000 square feet). The total combined footprint of the three (3) bunkies is estimated to be 278.7 square metres (or 3000 square feet).

Each bunkie will be powered by solar and will include its own holding tank for water and a compost toilet. The water storage tanks will supply non-potable water for sink and shower. A five (5) gallon dispenser will be used for drinking water. Therefore, the bunkies will not require the extension of infrastructure.

The approximate location of the bunkies will be determined at the time of Site Plan Control Approval (SPCA).

In the future, Good Food Farms may wish to offer yoga and massage services for patrons, and, establish a commercial kitchen and/or on-farm store where products from livestock raised on the farm can be processed to create value added products which can then be sold. As such, these uses have been considered in the Planning analysis for the OPA and ZBA. As these are future considerations, they will not be included in the application for Site Plan Control Approval (SPCA). An amendment to the SPCA would be required in order to permit the development of the additional OFDU/Agri-Tourism uses. The additional OFDU/Agri-Tourism uses will be required to comply with the policy and regulatory framework implemented for them on the Subject Lands.

Good Food Farms also wishes to construct one (1) second Single Detached Dwelling that is independent and physically separated from the principle dwelling unit on the Subject Lands to be used for the purpose of accommodating one (1) **permanent** Additional Residential Dwelling Unit (ARDU). The ARDU is intended for permanent accommodations of a person or persons which may or may not include on-farm labourers and/or family farm help.

The ARDU is proposed to be constructed within the building cluster in close proximity to the existing Single Detached Dwelling. The ARDU will be serviced by the existing water and hydro connections and on-site septic system.

3.0 Summary of Proposed Amendments

A Site-Specific Official Plan Amendment (OPA) and Zoning By-Law Amendment (ZBA) is required to facilitate the development of the OFDU and Agri-Tourism Uses and the ARDU on the Subject Lands.

3.1 Official Plan Amendments (OPA)

The Lower Tier (North Middlesex) Official Plan permits a second farm residence, accessory residential dwelling units (i.e. granny flats or garden suites), and on-farm secondary businesses in the Agricultural Area Land Use Designation provided these uses do not conflict with existing farm operations or with any Natural Heritage Features and subject to the following policies of the Official Plan (2023, p. 6-7, subsection 6.4.1.a and 6.4.1.f [i] and [iii]):

- Section 9.3.3,
- Section 5.2.3, and,
- Section 6.4.2.e.

Accessory Residential Dwelling Units

Section 6.4.1.a requires a second farm residence to be accessory to the main farm operation and temporary.

Section 5.2.3 a) of the Official Plan (2023) respecting Accessory Residential Dwellings requires the addition of an accessory residential dwelling unit to be within the structure of a single-detached residential dwelling (p. 5-8).

The proposed dwelling will be contained within a second permanent single detached dwelling building that is independent and physically separated from the principal dwelling on site. Therefore, a Site-Specific amendment to the Lower Tier Official Plan is required to permit the additional residential dwelling unit.

On-Farm Secondary Businesses

Section 6.4.2.e of the Official Plan (2023) defines an On-Farm Secondary business as a gainful occupation by a member of the farm family with support of up to three non-farm family members (6.4.2.e). In order to ensure that the scale of the business is clearly accessory to the farm use, however, the business must be conducted in whole or in part in an accessory building such as a shed or farm building and the gross floor area (GFA) of the on-farm business shall not exceed the GFA of the residential unit.

The proposed Agri-Tourism Use will be conducted within three new separate buildings. Limitations on the area of the proposed Agri-Tourism use will be based on the area of the land covered by the OFDU/Agri-Tourism uses in conformity with Provincial Guidelines, rather than being based on the number of buildings, GFA, and the number of non-family members employed to support the OFDU. Therefore, a Site-Specific amendment to the Lower Tier Official Plan is required to permit the proposed On-Farm Diversified Uses and Agri-Tourism Uses.

A site-specific amendment to the Lower Tier Official Plan (2023) is required to add a special provision to the Agricultural Area Land Use Designation that will apply to the Subject Lands for the following purpose:

- 1. The development of a second permanent Single Detached Dwelling that is independent and physically separated from the principle dwelling unit. The severance of a second Single Detached Dwelling, except where the dwelling is together with the principal dwelling as a consent for surplus dwelling, shall be prohibited.**
- 2. The development of On-Farm Diversified Uses for the processing and selling of agricultural products and Agri-Tourism Uses, which may include limited accommodations and recreational opportunities, that promote the enjoyment, education or activities related to the farm operation and the surrounding lands, conducted in whole or in part within a building or collection of buildings, and may include outdoor areas or facilities for recreation or education associated with the use. Such uses shall not exceed 2% of the lands to a maximum of 1 hectare on which the uses are located. The Zoning By-Law shall set out the permitted uses and the standards applicable to them.**

3.2 Zoning Bylaw Amendments (ZBA)

Amendments to By-Law No. 35 of 2024, as amended, are required to facilitate the construction of the proposed second Single Detached Dwelling and On-Farm Diversified/Agri-Tourism Use. An overview of the proposed amendment is provided in **Section 5** of this report.

4.0 Planning Analysis

In carrying out their responsibilities under the *Planning Act*, the Council must have regard to the matters of provincial interest listed under Section 2 of the Planning Act, and, their decisions- in respect of the exercise of any authority that affects a Planning matter- must be consistent with Policy Statements that are in effect on the date of the decision and conform with the provincial plans that are in effect on that date, in accordance with subsection 3 (5) of the Planning Act. Similarly, comments, submissions or advice that affect a planning matter that are provided by the council of a municipality [...] commission or agency of the government “shall be consistent with” the Provincial Planning Statement.

The Provincial Planning Statement, 2024 (PPS, 2024) was issued under Section 3 of the Planning Act and replaces PPS, 2020. It is effective October 20, 2024. Thus, the analysis undertaken in this PJR utilizes policies from PPS, 2024.

Within Planning legislation, “consistency” is applied to mean that the OPA and ZBA is not contradictory or vary from provincial planning policies contained within PPS, 2024. The OPA and ZBA must be clearly in agreement with PPS, 2024. To assist in the determination of consistency, Chapter 1 of PPS (2024) (p.3) provides direction on how to consider specific policy language. Some policies set out positive directives through the use of words such as “shall be”. Other policies set out limitations and prohibitions through the use of words such as “shall not”. Other policies use enabling or supportive language such as “should”, “promote”, and “encourage”.

Where specific language is used in a policy referenced in this Analysis, it has been intentionally **bolded** if it is a directive and underlined if it is enabling or supporting, to assist in understanding how the proposal is consistent with the PPS (2024). The *Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas (2016)* has been used as a guide in the analysis of relevant sections of the PPS (2024). As explained under Section 1 of the Guidelines (2016), the document is meant to complement, be consistent with, and explain the intent of the PPS. Where specific parameters are proposed, they represent best practices rather than specific standards that must be met in every scenario (p. 1).

A decision of the Council must also conform with applicable policies contained in the Official Plan for the County of Middlesex and the Official Plan for the Municipality of North Middlesex.

Within Planning Legislation, “Conformity” is applied to mean that the proposal must be similar in form to and be in harmony with the policies of the County Official Plan and Municipal Official Plan, such that it exists in compliant fashion with the higher order Official Plan policies that prevail above it. The policies of the Provincial Planning Statement, 2024 continue to apply after adoption and approval of an official plan.

For an OPA and ZBA to “conform”, it need not be absolute or identical in its adherence to the Official Plan policies, but it can neither be selective and conform to only some and ignore other aspects of the Plan’s policies.

This Section outlines in detail how the proposed OPA and ZBA has regard to matters of Provincial Interest, is consistent with PPS, 2024, and, conforms with the Upper Tier Official Plan and Lower Tier Official Plan. No provincial plan or plans are applicable to this development; therefore, the Planning Analysis has not been applied to any provincial plan(s).

4.1 Matters of Provincial Interest

Section 2 of the Planning Act identifies matters of Provincial Interest that Council must have regard to when carrying out its responsibilities under the *Planning Act*. Matters of Provincial Interest that are relevant to the proposal are identified and analyzed below in **Table 2–Matters of Provincial Interest**.

TABLE 2 –MATTERS OF PROVINCIAL INTEREST

Matter of Provincial Interest	Analysis
a) <i>The protection of ecological systems, including natural areas, features and functions;</i>	The proposed uses will be located outside of the natural areas and woodlands and Hazard Lands identified in Figure 2 of this Report.
b) <i>The protection of the agricultural resources of the Province;</i>	The predominate use of the lands will continue to be for agricultural purposes, specifically, for the raising of livestock and growing and harvesting of cash crops.
e) <i>The supply, efficient use and conservation of energy and water;</i>	The proposed bunkies for Agri-Tourism use will be powered by solar energy and will use a composting toilet which will in turn conserve energy and efficiently use water resources.

4.2 Provincial Planning Statement, 2024 (PPS, 2024)

The Provincial Planning Statement (PPS, 2024) provides policy direction on matters of provincial interest related to land use planning and development. It is a key part of Ontario's policy-led planning system. Consequently, it sets the policy foundation for regulating the development and use of land province-wide, helping to achieve provincial goals and enhancing the quality of life for all Ontarians (p. 2).

4.2.1 Rural Areas in Municipalities

Section 2.5 of the PPS, 2024 provides for the following policies relevant to the proposed OA and ZBA:

Policy

- 1) *Healthy, integrated and viable rural areas should be supported by:*
 - a) *Building upon rural character, and leveraging rural amenities and assets;*
 - e) *Promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;*
 - f) *Providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;*
 - h) *Providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.*

Analysis

Rural areas are defined under PPS (2024) as a “system of lands which include prime agricultural areas, natural heritage features and areas, and resource areas”. In reference to **Figure 4** of this report, the Subject Lands are located within an area which includes prime agricultural lands, a system of natural areas and woodlands, and environmentally protected marshlands. The proposed Agri-Tourism uses will leverage the area's rural amenities and assets by providing opportunities for sustainable tourism accommodations that will leverage the area's natural assets. On-Farm Diversified uses, which include Agri-Tourism uses, are permitted economic activities in prime agricultural areas under policy 4.3. In accordance with the Guidelines (2016), on-farm diversified uses are intended to enable farm operators to diversify and supplement their farm income (p. 17). The proposed amendments will provide an opportunity for diversified economic activities on the Subject Lands. The proposed uses will also help diversify the economic base of the neighbouring rural community of Ailsa Craig known for its arts and culture.

4.2.2 Natural Heritage

Section 4.1 of the PPS, 2024 provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- 1) *Natural features and areas **shall be** protected for the long term.*
- 2) *Development and site alteration **shall not** be permitted in:*
 - b) *significant woodlands in Ecoregions 6E and 7E (excluding Islands in Lake Huron and the St. Mary's River),*

unless it has been demonstrated that there will be no negative impact on the natural features or their ecological functions.

Analysis

The Subject Lands contain natural areas and woodlands and are located within Ecoregions 6E and 7E. No development or site alteration is proposed within the natural areas or woodlands identified in Figure 2 of this report.

4.2.3 Agriculture

Section 4.3.2 of the PPS, 2024 provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- 1) *In prime agricultural areas, permitted uses and activities are: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance.*

*Proposed agricultural related uses and on-farm diversified uses **shall be** compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on provincial guidance or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.*

- 5) *Where a residential dwelling is permitted on a lot in a prime agricultural area, up to two additional residential units **shall be** permitted in accordance with provincial guidance, provided that, where two additional residential units are proposed, at least one of these additional residential units is located within or attached to the principal dwelling, and any additional residential units:*

- (a) *Comply with the minimum distance separation formulae;*
- (b) *Are compatible with, and would not hinder surrounding agricultural operations;*
- (c) *Have appropriate sewage and water services;*
- (d) *Address any public health and safety concerns;*

- (e) Are of a limited scale and are located within, attached, or in close proximity to the principal dwelling or farm dwelling cluster; and*
- (f) Minimize land taken out of agricultural production.*

Analysis

A wide variety of uses may qualify as on-farm diversified uses based on the PPS definition, as long as they meet the criteria described in the Guidelines (2016). In accordance with the Guidelines (2016), all of the following criteria must be met to qualify as an on-farm diversified use, in accordance with the PPS:

1. Located on a Farm.

On-farm diversified uses (OFDU) must be located on a farm property that is actively in agricultural use. Agricultural uses occur on a farm with the expectation of gain or reward. This does not include production primarily for use or consumption by members of the household of the owner or operator of the agricultural operation, for purposes of pastime or recreation, or in a park, on a property used primarily for residential purposes or in a garden located in a public space (Guidelines, 2016, p. 18). To qualify as an agricultural use, crops generally produce a harvestable product. Agricultural uses include the raising of livestock and other animals for food, fur or fibre. Animals must be raised, live on or be used on the farm.

In addition to share cropping, Good Food Farms is focused on outdoor free range pastured chicken products. They make pre marinated kabobs, seasoned chicken burgers, breakfast patties, honey garlic wings, bone broth, soups, pot pie, quiche, enchiladas, smoked chicken from chickens raised on the farm for wholesaling of products and direct-to-consumer sales through farmers markets. Therefore, the proposed OFDU will be located on a farm.

2. Secondary to the Principal Agricultural Use of the Property.

Agricultural uses must remain the dominant use of the property. This can be measured in spatial terms in accordance with the Guidelines (2016, p. 18). Spatially, the use must be secondary relative to the agricultural use of the property. The spatial limits are addressed below under the “limited in area” criterion. With consideration for the below, the proposed OFDU can be considered secondary to the principle agricultural use of the property.

3. Limited in Area.

This criterion is intended to:

- minimize the amount of land taken out of agricultural production, if any
- ensure agriculture remains the main land use in prime agricultural areas
- limit off-site impacts (e.g., traffic, changes to the agricultural-rural character) to ensure compatibility with surrounding agricultural operations

In accordance with the Guidelines (2016), many municipalities limit the scale of on-farm diversified uses by limiting the number or place of residence of employees, number of businesses, percentage of products sold that are produced on the farm or floor area of buildings and outdoor storage. However, these factors do not have a direct bearing on the amount of farmland displaced or fully account for all the land occupied by the uses. A preferred approach is to base “limited in area” on the total footprint of the uses, on a lot coverage ratio basis (p.19).

The Guidelines (2016) recommend that “limited in area” be relative to the size of the farm property on which the on-farm diversified use is located. The size of the entire farm property, and not just the portion of a farm that is in agricultural use, should be considered. The Guidelines (2016) recommend that the standard for the acceptable area occupied by an on-farm diversified use is up to 2% of a farm parcel to a maximum of 1 ha (10,000 m²). If more than one on-farm diversified use is proposed on a single property, the combined area of all on-farm diversified uses should be within the above area and lot coverage guidelines (p. 20).

The “limited in area” requirement should be based on the total land area that is unavailable for agricultural production as a result of the on-farm diversified use (i.e., the footprint occupied by the use, expressed as a percentage of lot coverage). The area calculation should account for all aspects related to an on-farm diversified use such as buildings, outdoor storage, landscaped areas, berms, well and septic systems, parking and new access roads (Guidelines, 2016, p. 19).

The Subject Lands have a total land area of +39 Hectares (or +97 acres). 2% of the land area is equal to +0.78 hectares (or 1.94 acres). The three (3) bunkies

will have an approximate building footprint of 278.7 square metres (or +3000 square feet). This represents an area of 0.02 hectares (or +0.07 acres). This leaves sufficient room for the inclusion of accessory parking spaces and access areas, outdoor areas, infrastructure, and the development of additional OFDUs in the future. The proposed OPA and ZBA will specify a limit of up to 2% to a maximum of 1 hectare to ensure future uses remain limited in area. Therefore, the proposed OFDU can be considered limited in area.

4. Includes, but is not limited to, home occupations, home industries, agri-tourism uses and uses that produce value added agricultural products.

The proposed amendments are considered Agri-Tourism uses because they are a form of farm-related tourism use (limited accommodation) that promote the enjoyment, education or activities related to the farm operation. Future OFDU uses including a commercial kitchen and on-farm store where products from livestock raised on the farm can be processed and sold are uses that produce value added agricultural products and are also considered OFDUs.

5. Shall be compatible with, and shall not hinder, surrounding agricultural operations.

In accordance with the Guidelines (2016), Compatibility Considerations include:

- **if the use hinders surrounding agricultural operations;**

The use will be contained completely on the subject lands. Through the SPCA process, the exact location of the bunkies will be determined so as not to hinder the agricultural operations on the lands. The bunkies will be required to comply with MDS regulations as per the Zoning By-Law amendment, too.

- **if the use is appropriate to available rural services and infrastructure;**

The use will be serviced by private on-site sewage systems and water systems. Private servicing is permissible in the rural area under the Upper Tier and Lower Tier Official Plan.

- **if the use maintains the agricultural/rural character of the area;**

The agricultural/rural character of the area will be maintained because the proposed use is a permitted use in the agricultural area and promotes agriculture.

- **If the use meets all applicable environmental standards;**
The use will not be located within a natural area or woodland, or within hazardous lands.
- **If the cumulative impact of multiple uses in prime agricultural areas is limited and does not undermine the agricultural nature of the area (p. 22);**

All proposed OFDU and Agri-Tourism uses will be limited to 2% of the land area. The predominate use of the lands will continue to be for primary agricultural uses, specifically, the growing of cash crops and raising of livestock.

The A1 Zone permits a Single Detached Residential dwelling associated with an agricultural use and on an agricultural lot under Subsection 7.1 of By-Law 35 of 2004. One (1) Additional Detached Residential Unit (ADRU) is proposed on the site. The ADRU is proposed to be located in close proximity to the principal dwelling and the farm building cluster, as identified in the **Figure 5** below.

The majority of the area where a future ADRU is proposed to be located is landscaped and not under agricultural production. Every effort will be made to minimize the impact of the proposed dwelling on the lands under agricultural production. Therefore, the dwelling will not hinder surrounding agricultural operations. The impact to agriculture can be further mitigated by prescribing a maximum footprint for the ADRU. The proposed Zoning By-Law Amendment prescribes a Gross Floor Area (GFA) for the ADRU that is no larger than the principal dwelling. The ADRU has access to existing municipal water services. The ADRU must be serviced by a private on-site septic system. The site is sufficiently large enough to accommodate a new septic system. The ARU will be located outside the Hazardous lands, therefore, there is no public health or safety concerns. The ARU will be required to comply with the MDS formulae between new development and existing livestock facilities.

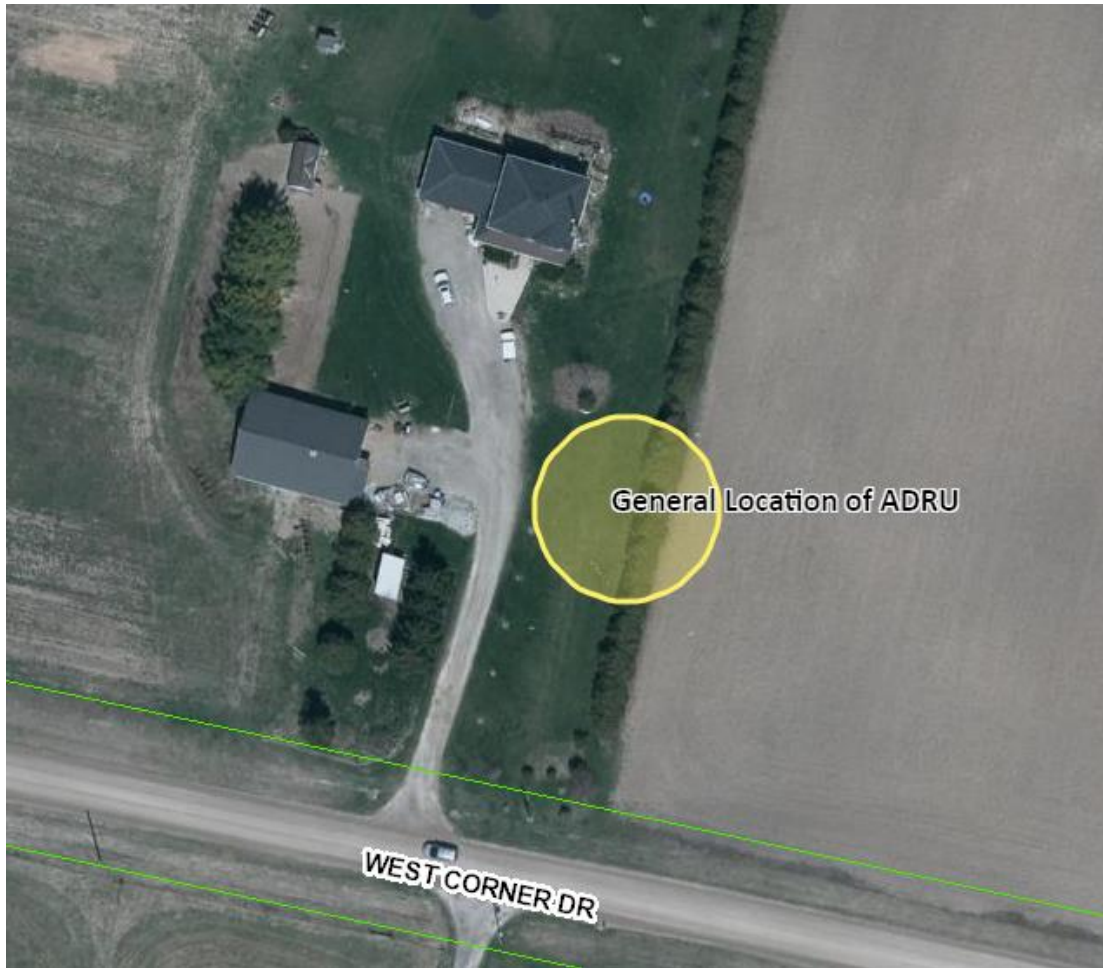


Figure 5. General Location of ADRU

Summary

Based on the foregoing analysis, it is my professional opinion that the OPA and ZBA are consistent with the Provincial Planning Statement, 2024 (PPS, 2024).

[4.3 Middlesex County Official Plan \(2023\)](#)

The Provincial Planning Statement (PPS, 2024) states that the official plan is the most important vehicle for implementation of the PPS, 2024 and for achieving comprehensive, integrated and long-term planning (p. 2). Planning authorities shall keep their official plans up-to-date with the PPS, 2024.

The Middlesex County Official Plan (2023) (the “Upper Tier OP”) is one tool to be used in working towards the long-term vision for the County. The Upper Tier OP (2023) directs

and guides the County in land use policy and physical planning on a broad basis and is intended to:

- Establish an upper tier policy framework that provides direction to the local municipalities in the preparation of local Official Plans and Zoning By-Laws;
- Set a framework for coordination and cooperation amongst the local municipalities and the County on planning and development issues that transcend municipal boundaries (p. 1-2).

4.3.1 Natural Heritage Features

Section 2.3.10 of the Upper Tier OP (2023) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

*When an application for development within a Natural Heritage Feature, or on the adjacent lands [...], the appropriate Conservation Authority and the Province **shall be consulted.***

Analysis

No development is proposed within the natural areas or woodlands.

4.3.2 Natural Hazards Policies

Section 2.3.11 of the Upper Tier OP (2023) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

It is the policy of this Plan to direct development and site alteration to areas outside of Natural Hazards to reduce potential risks to public health or safety or of property damage.

The County also requires local municipalities enact zoning by-laws that impose appropriate setbacks from Natural Hazards, based on the kind, extent and severity of existing and potential hazard to public safety and infrastructure.

Analysis

The applicant has consulted with the Ausable Bayfield Conservation Authority (ABCA). The Conservation Authority has acknowledged that bunkies will be located in an area generally outside ABCA's regulation limit based on a conceptual site plan.

The Conservation Authority has explained that the regulation limit indicates a 15-metre setback from the theoretical stable top of the bank above the valley. Based on a cursory

review, the Conservation Authority states that the drawings suggests that the structure is nestled tightly near the end section of the “peninsula” shaped area. Other associated elements of the plan such as trees, chicken coops, plantings, sprawl out into regulated tablelands adjacent to the top of the bank. The Conservation Authority has confirmed that these elements would have marginal impacts on the condition of the tablelands from its current agricultural state. The intent of ABCA’s valley land and slope stability policies is to protect life and property from slope failures. They recommend that the regulated tablelands adjacent to the top of the bank *should* be left in a natural state to allow for the natural succession of vegetation from the valley.

4.3.3 Agriculture

Section 2.2.2 of the Upper Tier OP (2023) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

2.2.2.2 General Policies

Agricultural-related and on farm diversified uses **shall be** compatible with and not hinder, surrounding agricultural operations. Permitted agricultural-related and on-farm diversified uses shall be in accordance with the 2016 Guidelines for Permitted Uses in Ontario’s Prime Agricultural Area as released by the Province.

Analysis

The proposed OFDUs are compatible with the surrounding agricultural operations and have been evaluated based on the 2016 Guidelines for Permitted Uses in Agricultural Areas.

4.3.4 Economic Development

Section 2.3.4 of the Upper Tier OP (2023) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- s) *promote the development of agri-tourism and work with local municipalities and agricultural representatives to explore options for the development of local agri-tourism, including identifying strengths, unique local attributes, opportunities, and potential links with value added agriculture, local foods, potential new product markets, local heritage, recreation opportunities, farm vacation enterprises, and natural heritage and identifying the facilities, infrastructure, and resources*

necessary to support an agri-tourism industry. The development of agri-tourism must not interfere with agricultural operations.

Analysis

The proposed amendments will promote the development of local agri-tourism use, specifically, farm vacation enterprises and recreation opportunities. The proposed uses will be limited in area and will not interfere with agricultural operations.

4.3.5 Additional Residential Units

Section 2.3.7.4 of the Upper Tier OP (2023) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

*The development of additional residential units **shall be permitted** as a means of increasing the diversity and stock of rental and affordable housing, creating opportunities for aging in place, and providing homeowners with additional sources of income.*

*Local municipal official plans and zoning by-laws **shall** address the following:*

- a) the building code, fire code, and all other Provincial, County, and Municipal standards,*
- b) the provision of adequate access, including emergency access,*
- c) that the additional residential unit(s) be clearly subordinate in scale and function to the primary unit, and,*
- d) not be permitted within hazard lands as defined and regulated by conservation authorities.*

*Specific to the creation of additional residential units outside of settlement areas, such uses shall be grouped with the primary dwelling, **shall** meet Minimum Distance Separation formulae, and shall be prohibited from being severed from the property unless as part of the severance of the primary dwelling unit as a residence surplus to a farming operation.*

Analysis

The proposed ADRU will be limited in area to be not greater than the principal dwelling unit and therefore will be subordinate in scale and function to the primary unit. The ADRU will not be located in hazard lands and will be required to meet MDS formulae. The ADRU will be grouped in close proximity to the primary dwelling within the existing building cluster. The ADRU will not be permitted to be severed on a separate lot in accordance with County policies.

4.3.6 Agricultural Areas

Section 3.3 of the Upper Tier OP (2023) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

3.3.2 *Limited on-farm diversified uses may be permitted in the Prime Agricultural Areas subject to site specific zoning regulations and are not removed from the Agricultural Area land use designation.*

3.3.3 *Agricultural areas **shall** generally permit the following use:*

k) Additional Residential Units in accordance with Section 2.3.7.4

l) agriculture-related and on-farm diversified uses in accordance with Section 3.3.5

3.3.5 *Agriculture-related and on-farm diversified uses directly related to, and supportive of, agricultural operations, including [...] agri-tourism may be permitted providing the following policies are considered:*

a) the agriculture-related use and on-farm diversified use cannot reasonably be located in a Settlement Area and must be located in proximity to farming activities;

*b) such uses **shall** be located to conform with the Minimum Distance Separation Formula;*

c) where local zoning by-laws do not provide as of right zoning for agriculture related and on-farm diversified uses a site-specific amendment to the Zoning By-Law is approved;

*d) the agriculture-related and on-farm diversified use shall not require large volumes of water nor generate large volumes of effluent and **shall** be serviced with appropriate water supply and sewage treatment facilities;*

*e) agriculture-related and on-farm diversified uses **shall** be located and designated to minimize potential adverse impacts upon adjacent residential or other sensitive uses by buffering measures such as landscaping, berming and building setback and layout;*

*f) the location of agriculture-related and on-farm diversified uses **must** provide for a minimum sight distances from access points in either direction along a County or local road;*

g) the site plan policies of the Official Plan;

*h) the agriculture-related and on-farm diversified uses **shall** be in accordance with the Provincial Guidelines on Permitted Uses in Prime Agricultural Areas;*

i) for on-farm diversified uses, the relationship of the proposed use to the underlying farm operation;

j) agriculture-related and on-farm diversified uses are to remain within the Agricultural Area land use designation and are permitted without the need to amend this Plan.

Analysis

The proposed OFDUs will be subject to site specific zoning regulations. The proposed OFDUs will not be removed from the agricultural land use designation. The proposed OFDUs will be for Agri-Tourism use. The proposed OFDU cannot be reasonably located in a Settlement Area because the proposed OFDU is an Agri-Tourism use which seeks to promote the sustainable practices of the farm and the natural beauty of the lands. The proposed use will conform with all MDS formula. Zoning regulations for the OFDU have been proposed. The proposed OFDU will be self sustaining and will therefore not require large volumes of water nor generate large volumes of effluent and will be serviced with appropriate water supply and sewage treatment facilities. The OFDU will be subject to SPC approval.

Summary

Based on the foregoing analysis, it is my professional opinion that the OPA and ZBA conforms with the County of Middlesex Official Plan.

4.4 North Middlesex Official Plan

The Goals of the North Middlesex Official Plan is:

- a) to create a planning framework that promotes a flexible and adaptable economic environment to encourage investment and a broad range of employment opportunities, protects the dominance of the agricultural industry, and protects other rural resources;
- b) To promote the health and well-being of the Municipality and its residents through the planning and development of strong, efficient and healthy communities and associated services; and
- c) To enhance and protect the quality of the natural and built environment, while providing for the changing needs of the community.

4.4.1 Growth Management Objectives

Section 3.3.1 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- d) Protect the rural area as the principle focus of resource related activities, including, but not limited to, agriculture, resource extraction, and environmental protection and appreciation.*

Analysis

The proposed amendments will protect the area for agricultural uses.

4.4.2 Economic Development Objectives

Section 3.3.2 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- a) Ensure the continued economic strength of agriculture in North Middlesex.*
- b) Foster tourism potential through the protection and augmentation of the Municipality's unique characteristics.*

Analysis

The proposed amendments are intended to foster agri-tourism in the area through leveraging the area's natural assets.

4.4.3 Agriculture & Rural Resource Objectives

Section 3.3.3 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- a) Preserve agriculture as the primary land use outside of the Settlement Areas.*
- b) Recognize and preserve the rural context and agricultural heritage as a significant factor contributing to the Municipal economy.*
- c) Promote the viability of farm operations, ensuring their continued economic strength, wherever possible.*

Analysis

OFDUs are intended to enable farm operators to diversify and supplement their farm income, as well as to accommodate value-added and agri-tourism uses in prime agricultural areas. Therefore, the proposal promotes the viability of the farm operation ensuring its continued economic strength.

4.4.4 Land Use Objectives

Section 3.3.5 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

- a) *Protect agricultural activities and the agricultural land base from the intrusion of incompatible uses.*
- b) *Reduce conflicts between existing and proposed land uses through buffering, setbacks, landscaping and other appropriate standards in the Zoning By-law.*
- c) *Guide the maintenance and growth of economic activity in the Municipality through the development of proactive and flexible land use policy for areas of economic activity.*

Analysis

The proposed uses are permitted uses in the agricultural area and therefore protect agricultural activities and the agricultural land base. Appropriate Zoning By-Law standards have been proposed to ensure buffering through setbacks between incompatible and sensitive land uses.

4.4.5 Tourism Related Economic Development

Section 4.1.2 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

This Plan encourages growth in tourism and visitation to the Municipality, particularly in the Central Areas of Ailsa Craig and Parkhill and in areas of rural amenity. The following tourism related policies shall apply.

- a) *This Plan promotes the existing tourism and destination-oriented uses in the Municipality and encourages the establishment of additional tourism opportunities within the Urban Settlement Areas and areas of scenic quality.*
- c) *Agriculturally related and rural resource-related tourism opportunities will be encouraged.*

Analysis

The proposed amendments will add rural resource related tourism opportunities and encourage growth in tourism in the Central Areas of Aisla Craig as the Subject Lands are located just outside the community.

4.4.6 Agricultural Area Land Use Designation

Section 6.4 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

6.4.1 Permitted Uses permitted on lands designated Agricultural Area on Schedule “A” are as follows.

a) The primary use of land shall be for farming, agriculture and agriculturally-related uses. The farm unit shall generally consist of farmland, the farm residence, farm buildings and structures and any farm woodlots or natural heritage features.

f) The following secondary uses may also be permitted, provided these uses do not conflict with existing farming operations or with any Natural Heritage Features:

i) Accessory residential dwellings, “granny flats” or garden suites, subject to the policies of Section 5.2.3, save and except for that use of existing site services is permitted in lieu of full municipal services;

iii) On-farm secondary businesses, subject to the policies of Section 6.4.2.e

6.4.2 Policies The following policies apply to lands designated Agricultural Area.

e) On-farm secondary businesses comprise a gainful occupation conducted in whole or in part in an accessory building (shed or farm building) by a member of the farm family, with support of up to three non-farm family members. In order to ensure that the scale of the business is clearly accessory to the farm use, the gross floor area of the on-farm secondary business shall not exceed the gross floor area of the residential unit. Outside storage associated with the on-farm secondary business shall be limited in scale and be screened from view from surrounding roads. On-farm secondary businesses shall have no negative impact on Natural Heritage Features or their ecological functions. The range of on-farm secondary businesses permitted and the standards applying to them shall be set out in the Zoning By-law. On-farm secondary businesses shall be subject to site plan control.

Analysis

The proposed amendments will add an accessory residential dwelling and on-farm secondary businesses, consistent with uses that are permitted in the agricultural area and subject to different policies and regulations to better align with Provincial policy and the Upper Tier Official Plan.

4.4.7 Official Plan Amendments

Section 9.6.1 of the Lower Tier OP (2024) provides for the following policies relevant to the proposed OPA and ZBA:

Policy

The following policies shall apply to the consideration of applications to amend this Plan:

a) Applications to amend this Plan shall include a justification report for the proposed change, prepared by the applicant. This shall include, but not be limited to, information regarding the proposed use, servicing, density if applicable, floor area if applicable, lot layout and site plans as appropriate and applicable.

b) Applications for Official Plan Amendment shall be carried out in accordance with the relevant policies and procedures outlined in the Land Use Policies of this Plan and the policies of Section 9.6.1c).

c) Council shall consider the following criteria where reviewing applications to amend this Plan:

i) The manner in which the proposed amendment conforms to prevailing Provincial policy and regulations;

ii) The manner in which the proposed amendment conforms to the Middlesex County Official Plan;

iii) The manner in which the proposed amendment conforms to the goals, objectives and policies of this Plan;

iv) The manner in which the proposed amendment conforms to the Municipal Strategic Plan;

v) The impacts of the proposed amendment on the provision of and demand for municipal services, infrastructure and facilities;

vi) The adequacy of the proposed servicing solution with respect to the servicing policies of this Plan;

vii) The impact of the proposed amendment on surrounding lands uses, the transportation system, municipal services and community amenities and service;

viii) The impact of the proposed amendment on the hierarchy of Settlement Areas and the structure and nature of the Urban, Community and/or Hamlet Settlement Areas;

ix) The impact of the proposed amendment on cultural and/or natural heritage features;

*x) The impact of the proposed amendment on the finances of the Municipality;
and*

xi) Any other information determined to be appropriate and applicable.

Analysis

The proposed amendments are consistent with the PPS (2024) and conform with the Upper Tier and Lower Tier Official Plan as described in this report.

The proposed amendments will have no impact on municipal services as the bunkies are intended to be self sufficient. The ARU will be serviced through existing water services.

The proposed amendments are similar in nature to uses permitted in the agricultural area (ARUs and On-Farm Secondary Businesses) and will therefore have no impact on the surrounding land uses.

The proposed amendments will have no impact on cultural or natural heritage features.

The proposed amendments are consistent with the Goals of the North Middlesex Community and Corporate Strategic Plan 2018-2028 because it will Support rural economic activity, including production of agricultural and agriculture-related products, and rural recreational activities (p. 43).

Summary

Based on the foregoing analysis, it is my professional opinion that the OPA and ZBA conforms with the North Middlesex Official Plan (2024).

5.0 Proposed Zoning By-Law Amendment

The Subject Lands are zoned General Agricultural (A1) in accordance with Map 15 of By-Law 35 of 2004.

Amendments to By-Law No. 35 of 2024, as amended, are required to facilitate the construction of the proposed second Single Detached Dwelling and On-Farm Diversified/Agri-Tourism Use.

The following actions are required to facilitate the ZBA:

Add the following General Agricultural Exception under Subsection 7.4 of Section 7, General Agricultural (A1) Zone, for the Lands known municipally as 3610 West Corner Drive:

1. Notwithstanding Section 7.1, on lands shown on Schedule “A” (Map 15), the provisions of Section 7 shall apply with the exception that an Additional Residential Dwelling Unit shall be permitted within a detached building physically separate from the principal dwelling and subject to the following regulations:
 - a) Maximum Lot Coverage: Equal to or less than the Principal Dwelling
 - b) Minimum Front Yard: 15 m
 - c) Minimum Interior side yard: 15m
 - d) Maximum Building Height: Equal to or less than the Principal Dwelling
 - e) The Minimum Distance from an intensive agricultural use for a detached Additional Residential Dwelling Unit shall be in accordance with the MDS-1 provided for under section 6.26 of the Zoning By-Law.
 - f) Despite subsection 7.2.6 of the Zoning By-Law, the detached Additional Residential Dwelling Unit shall not be required to be temporary and the dwelling may be used for the purposes of boarding on-farm labourers.
2. Notwithstanding Section 7.1, on lands shown on Schedule “A” (Map 15), the provisions of Section 7 shall apply with the exception that On-Farm Diversified Uses and Agri-Tourism Uses shall be permitted and subject to the following regulations:
 - a) On-Farm Diversified Uses shall mean uses that are secondary to the principal agricultural use of the property, and are limited in area. On-Farm Diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, uses that produce value-added agricultural products, and electricity generation facilities and transmission systems, and energy storage systems.
 - b) Agri-tourism uses shall be defined as those farm-related tourism uses, including limited accommodation such as farm vacation suites, that promote the enjoyment, education or activities related to the farm operation.
 - c) On-Farm Diversified Uses and Agri-Tourism uses shall be permitted within a building or within a designated outdoor area.
 - d) On-Farm Diversified Uses and Agri-Tourism uses shall not occupy more than 2% of the total land area up to a maximum of 1 hectare.

- e) The parking requirements shall be in accordance with subsection 6.34 of the Zoning By-Law expect that a farm vacation suite shall require a minimum of one (1) parking space per suite.
- f) Subsection 6.32 of the Zoning By-Law shall not apply to an On-Farm Diversified Use or Agri-Tourism use.
- g) Subsection 7.3.1 of the Zoning By-law shall apply to On-Farm Diversified Uses and Agri-Tourism Uses expect that provisions respecting the minimum lot frontage and minimum lot area of the Subject Lands.
- h) the maximum building height of a farm vacation suite shall be 10.5m.

Table 3.0 and **Table 4.0** provides an overview of how the proposed Zoning regulations comply with the Provincial policies and Guidelines.

Table 3.0 Zoning By-Law Compliance

Regulation	Required	Proposed	Compliance
Additional Residential Dwelling Unit (ADRU)			
Permitted Use	Second detached residential dwelling accessory to an agricultural use permitted only for temporary purposes and only to be used for the boarding of seasonal farm labourers.	An ADRU within a detached building physically separate from the principal dwelling	A permanent ADRU is permitted under the PPS (2024) and the Upper Tier Official Plan (2024).
Maximum Lot Coverage	No requirement	Equal to or less than principal dwelling	Required to ensure dwelling does not impact agriculture.
Minimum Front Yard	20 m	20 m	Complies
Minimum Interior Side Yard	15m	15m	Complies
Maximum Building Height	12m for a Dwelling on an existing lot of record	Equal to or less than principal dwelling	Required to ensure dwelling is subordinate to principal dwelling.

MDS	In accordance with MDS-I under section 6.26	In accordance with MDS-I under section 6.26	Complies
Subsection 7.2.6	Requires ADRU to be temporary and only for the boarding of seasonal farm help	ADRU not required to be temporary and not required to be for the boarding of seasonal farm help.	A second ADRU is not required to be solely for the purpose of boarding farm help under Provincial and County policy.

Table 4.0 Zoning By-Law Compliance

Regulation	Required	Proposed	Compliance
On-Farm Diversified Uses and Agri-Tourism Uses			
Permitted Use	On-Farm Secondary Business	On-Farm Diversified Uses and Agri-Tourism Uses	Permitted under Provincial and County Policy and Guidelines
Location	Only permitted in building	within a building or within a designated outdoor area	Complies with Provincial Policy and Guidelines
Lot Coverage	No greater than GFA of dwelling	2% of the total land area up to a maximum of 1 hectare	Complies with Provincial Policy and Guidelines
Parking Requirements	Minimum of 6 required parking spaces	in accordance with subsection 6.34 of the Zoning By-Law expect that a farm vacation suite shall require a minimum of one (1) parking space per suite.	Based on requirements of vacation suites.
Section 6.32	only one On Farm business permitted must be located in building and cannot	Shall not apply to an OFDU or Agri-Tourism Use	Section 6.32 is not consistent with provincial guidance

	<p>be larger than dwelling</p> <p>requires property owner to operate and limits employees</p> <p>no on-site retail sale</p>		<p>Replaced with site-specific zoning by-law amendments</p>
<p>Section 7.3.1</p>	<p>150.0 m lot frontage;</p> <p>39.0 hectare lot area;</p> <p>10.5 m maximum building height</p>	<p>minimum lot frontage and minimum lot area of the Subject Lands</p> <p>maximum building height shall be 10.5m</p>	<p>Lot frontage and lot area are not applicable to a OFDU/Agri-Tourism use as long as it meets the provincial criteria.</p> <p>Complies with height of accessory buildings.</p>

6.0 Summary and Conclusions

It is my opinion that the applications for Official Plan Amendment (OPA) and Zoning By-Law Amendment (ZBA) to represent good planning and are in the public interest. The application should be approved for the following reasons:

- **The applications have regard to matters of Provincial Interest, as required under Section 2 of the Planning Act.**
- **The applications are consistent with the Provincial Planning Statement (PPS, 2024).**
- **The applications conform with the Middlesex County Official Plan and North Middlesex Official Plan.**
- **The applications allow for On-Farm Diversified Uses and Agri-Tourism uses which are supportive of agriculture and leverage the natural assets of the area.**

- The applications allow for the provision of housing opportunities in rural areas that support the social and economic needs of the farmer.
- The applications promote sustainability in design, conservation of resources, and adaptation to a changing climate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Rita Jabbour', with a horizontal line extending to the right.

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