

Planning Justification Report

ZONING BY-LAW AMENDMENT

34210 Neil Road, Lucan, Municipality of North Middlesex, Middlesex County

May 2025

Prepared For:
Lucan Feeders Inc.

1-3 Glen Scarlett Road
Toronto, ON
M6N 1P5

Prepared By:
Baker Planning Group

PO Box 23002 Stratford
Stratford, ON
N5A 7V8

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1 INTRODUCTION

On behalf of Lucan Feeders Inc. ("Owner"), Baker Planning Group is submitting a Zoning By-law Amendment Application for land known municipally as 34210 Neil Road, Lucan, Municipality of North Middlesex, Middlesex County ("Site"). The Site is located west of the Lucan settlement area, within a predominantly agricultural area. With 445.09 metres of frontage, the Site has a land area of 78.74 hectares (Figure 1).

The Owner is proposing to construct on-farm housing to support the existing operation on the Site. Housing for the workers will include constructing a new single-storey building, oriented to Neil Road, that would provide accommodation for up to four (4) staff and interior renovations to the existing single detached dwelling on the Site for up to three (3) staff. The accommodation will provide permanent on-farm housing for the needed agricultural workforce, addressing broad-reaching challenges with housing affordability and workforce shortages, all with the premise to enable and sustain enhanced agricultural operations. Within the new proposed building, there will be four (4) self-contained suites with a bedroom and private bathroom and a communal living area with eating and cooking facilities.

The Site is designated as "Agricultural Areas" on Schedule "A" and "Natural Heritage System" on Schedule "C" to the County of Middlesex Official Plan (2023). The Municipality of North Middlesex Official Plan (2023) designates the Site as "Agricultural Areas" and "Hazard Lands" on Schedule "A". In keeping with the OP, the Site is zoned "General Agricultural" (A1) in the Municipality of North Middlesex Zoning By-law.

The portion of the Site adjacent to the creek is located within the Regulated Area for the Ausable Bayfield Conservation Authority (ABCA); however, all proposed development is located outside the Regulated Area.

As outlined in this Report, the Proposed Development will require a Zoning By-law Amendment to permit the development of permanent on-farm housing for workers, beyond the currently permitted one mobile home.

The Planning Justification Report ("Report") is being prepared to fulfill the submission requirements set out by the Municipality of North Middlesex. The Report provides a summary of the proposed land use and the applicable land use policies and will address the appropriateness of the application and whether it constitutes good land use planning.



Figure:

1

SITE

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON



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2 SITE AND AREA CONTEXT

The Site is located west of Lucan's settlement area, with frontage on Neil Road. The area is generally characterized as agricultural, with agricultural fields and livestock facilities.

With 445.09 metres of frontage, the Site has a land area of 78.74 hectares. The lot shape is irregular, as it aligns with the creek on the southern portion of the Site. The Site is comprised of agricultural uses, fields for cash crops and a naturalized area along the creek. There are two (2) existing road accesses from Neil Road, one of which includes a weigh scale.

There are several existing buildings on the Site, all intended for agricultural use. The Nutrient Management Plan for the Site includes 12,000 cattle housed in a central livestock facility that is approximately 20,000 square metres (215,000 square feet) in size with secure outdoor areas. There is also a grain elevator on the Site, as well as a grain elevator operation with five bins and an indoor and outdoor storage area. There are three accessory storage facilities for equipment on the Site, with a floor area of approximately 6,000 square metres (65,000 square feet).

The existing operation on the site has twenty (20) full-time employees. A single detached dwelling on the Site provides accommodation for up to three (3) people.

The Site is serviced by five (5) private wells and a septic system for the existing house. It is understood that there is a municipal water service on Neil Road; however, the existing development on the Site is not connected to this service. There are three (3) open manure facilities on the property.

The area surrounding the Site is predominantly characterized as agricultural and includes a tributary to the south (Figure 2).



Figure:

2

SURROUNDING LAND USES

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON



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3 PROPOSED DEVELOPMENT

The Owner is proposing to construct on-farm housing to support the existing operation on the Site. Housing for the workers will include the construction of a new single-storey building, oriented to Neil Road, that would provide accommodation for up to four (4) staff as well as interior renovations to the existing single detached dwelling on the Site for up to three (3) staff. The accommodation will provide permanent on-farm housing for the needed agricultural workforce, addressing broad-reaching challenges with housing affordability and workforce shortages, all with the premise to enable and sustain enhanced agricultural operations.

The proposed new building will be located immediately south of the existing driveway entrance from Neil Road and will be accessed from the existing driveway (Figure 3 and 4). The proposed location provides ease of access to the Site and agricultural operations while also providing additional sight lines and security for the property from Neil Road.

Within the new proposed building, there will be four (4) self-contained suites with a bedroom and private bathroom, as well as a communal living area with eating and cooking facilities.

A Concept Plan delineating the proposed site layout has been prepared for reference with the Application. Water service will be provided from the current on-site wells. A proposed new on-site sewage system will be located south of the new residential building.

The construction of the new building does not require the removal of any natural features and is located on a portion of the Site that is not currently utilized for agricultural purposes.

As outlined in the MDS Calculations (5), the Proposed Development is located beyond the required MDS setback to the neighbouring livestock facility, save an except for the existing livestock facility at 34219 Neil Road, which accommodates horses for recreational uses. As part of the Zoning By-law Amendment Application, the Owner is requesting a reduction in the MDS setback from 164 metres to 150 metres.

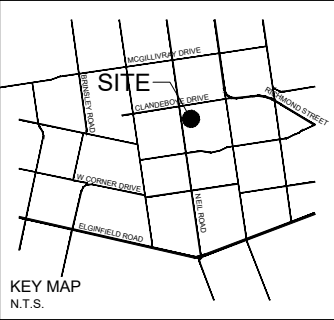
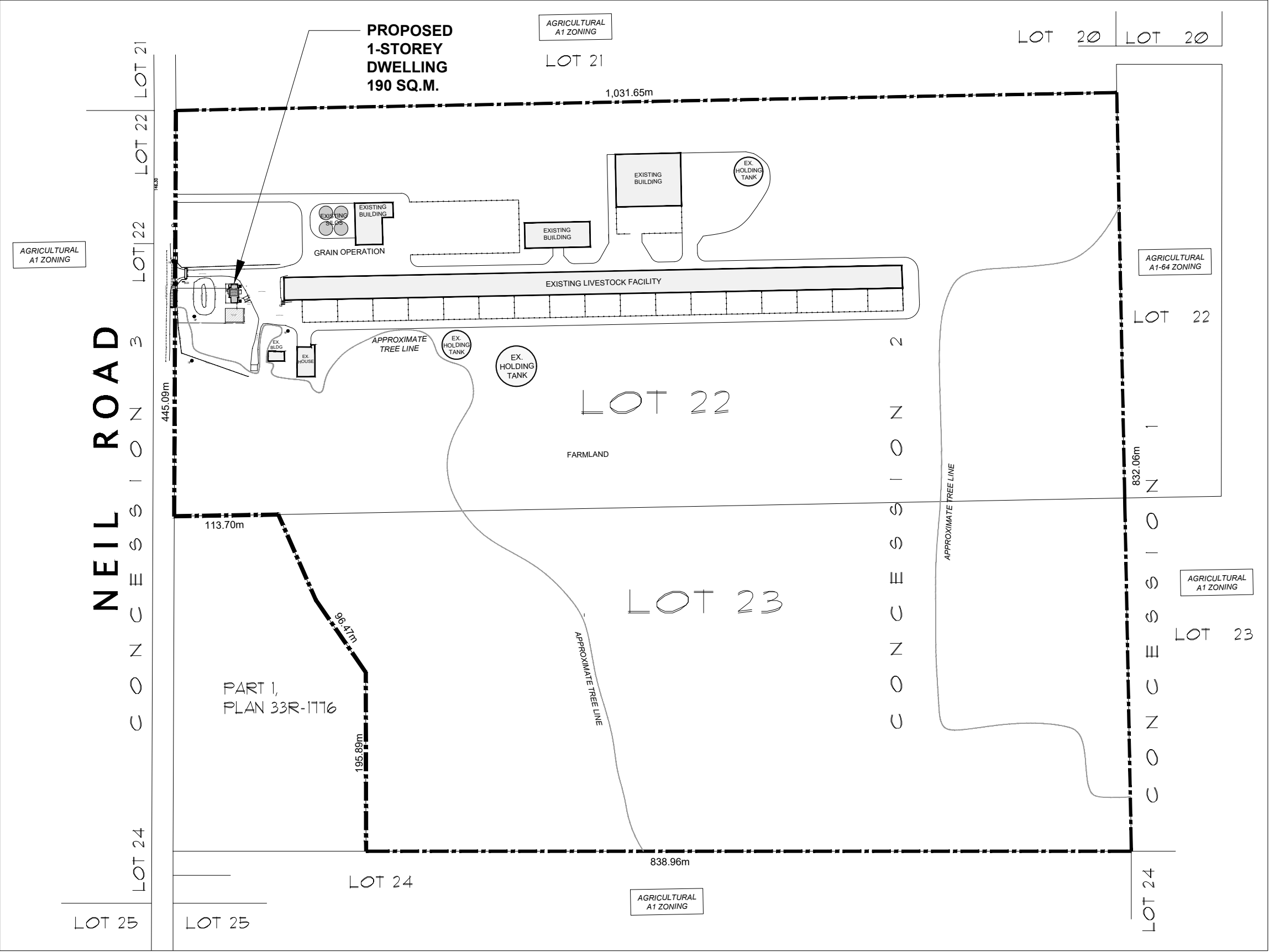
3-1 ZONING BY-LAW AMENDMENT

To permit the Proposed Development, a Zoning By-law Amendment to the Municipality of North Middlesex Zoning By-law is required to rezone the land to a site-specific A1 Zone, as follows:

Section 7.4.____ General Agricultural Exception ____ (A1-____)

In addition to the permitted uses in Section 7.1, on-farm housing shall be a permitted accessory use to agricultural uses, provided that:

- *A maximum of two (2) buildings are permitted for the purposes of on-farm housing*
- *Within the permitted buildings, a total maximum of eight (8) suites (private bathroom and bedroom) may be provided*
- *Communal living spaces are permitted in both buildings*



SITE DATA:
ZONE:
SITE AREA: 787,400.198m²
PROPOSED NEW COVERAGE: 190.45m²
PROPOSED NEW DWELLING: 242.46m²
PROPOSED PARKING: 2 spaces



Project Name:
**LOT 22 AND PART OF LOT 23
CONCESSION 2**
(GEOGRAPHIC TOWNSHIP OF MCGILLIVRAY)
IN THE MUNICIPALITY OF NORTH MIDDLESEX
COUNTY OF MIDDLESEX

34210 NEIL ROAD

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Sheet Title:
SITE PLAN

DISCLAIMER
Site boundary and dimensions are approximate and subject to change based on a formal land survey. The design is conceptual and subject to engineering and municipality confirmation and input.

Version No:	Sheet No:
1	SP-2
Scale: 1:4,000 METRIC	Date: 02/04/2025
Client Name: BAKER PLANNING GROUP	Drawn By: J.THIBERT

Figure:

4

CONCEPT PLAN - OVERALL SITE

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON



Notwithstanding Section 6.26.1, on lands shown on Schedule "A" (Map 31) the minimum distance separation between a dwelling and the closest livestock facility shall be 150 metres.

4 PLANNING POLICY FRAMEWORK

This section of the Planning Justification Report provides an overview of the relevant planning policies for the Proposed Development and the associated Zoning By-law Amendment Application.

4-1 PLANNING ACT, R.S.O. 1990, CHAPTER P.13

The *Planning Act, R.S.O. 1990, CHAPTER P.13*, provides provincial legislation that “sets out the ground rules for land use planning in Ontario. It describes how land uses may be controlled, and who may control them.”

Section 2 of the Planning Act outlines the matters of provincial interest that the council of a municipality, a planning board and the Ontario Land Tribunal shall have regard to in carrying out their responsibilities under the Act. The following table provides a summary of the provincial interests, along with an analysis as it relates to the proposed development and the subject Applications.

Table 4-1: Summary of Provincial Interest

Section	Provincial Interest	Analysis
a)	the protection of ecological systems, including natural areas, features and functions	The Proposed Development will not impact any natural features or functions. No tree removals are required, and the proposed building is approximately 50 metres from the treed area to the south, further from existing development on the site to the natural areas.
b)	the protection of the agricultural resources of the Province	The Proposed Development is supportive of the current agricultural use and does not remove any land currently used for agricultural production. A minor reduction is requested to the adjacent livestock facility (horses) of 6.0 metres; however, in our opinion, the potential for odour stemming from the Site would match and/or exceed potential odours from the adjacent livestock facilities.
c)	the conservation and management of natural resources and the mineral resource base	The area proposed for the new dwelling does not contain any natural resources or mineral resources.
d)	the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest	The area for the new dwelling is on a portion of the Site that has been developed as part of the livestock operation.
e)	the supply, efficient use and conservation of energy and water	The existing on-site well will be used to provide water service to the proposed new building. Consideration will be given at the time of

Section	Provincial Interest	Analysis
		Building Permit for a connection to the municipal water service on Neil Road.
f)	the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems	<ul style="list-style-type: none"> • Communication services are available to the Site. • Water service will likely be provided by an existing on-site well. • Sanitary service will be provided by a proposed new on-site sewage system. • Waste management residential services will be provided by the Municipality
g)	the minimization of waste	The Owners will explore opportunities to minimize waste through the construction process, should the application be approved.
h)	the orderly development of safe and healthy communities	The Site is located within an agricultural region and will provide safe adequate housing for on-farm workforce.
h.1)	the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies	Through future applications, including the Ontario Building Code, matters related to accessibility will be addressed.
i)	the adequate provision and distribution of educational, health, social, cultural and recreational facilities	The Site is located just west of the settlement area of Lucan where community facilities and services are available.
j)	the adequate provision of a full range of housing, including affordable housing	The Proposed Development will provide needed housing for on-site farm workforce. Farm operations have been challenged with the cost of housing to support their employees.
k)	the adequate provision of employment opportunities	The Proposed Development will provide housing to those employed by the on-site farm operation.
l)	the protection of the financial and economic well-being of the Province and its municipalities	The efficient use of land to provide needed workforce housing provides for long-term financial stability and cost-effective development.
m)	the co-ordination of planning activities of public bodies	To be addressed through the circulation of the planning applications to applicable public bodies.
n)	the resolution of planning conflicts involving public and private interests	Planning conflicts involving public and private interests have not been identified through the pre-consultation review with municipal staff.
o)	the protection of public health and safety	The Proposed Development will provide safe and secure living facilities for the workers, including a private bedroom and bathroom.

Section	Provincial Interest	Analysis
p)	the appropriate location of growth and development	The Proposed Development will provide on-site housing for needed workforce to support continued agricultural operations. Appropriate affordable housing is not adequately available in the region.
q)	the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians	The Site is located in a rural setting and has frontage on a municipal road. Employees will be able to walk to their place of employment on-site.
r)	the promotion of built form that:	
r.i)	is well-designed	The development will provide a sense of place by offering new well-designed residences.
r.ii)	encourages a sense of place	
r.iii)	provides for public spaces that are of high quality, safe, accessible, attractive and vibrant	The Site is located on an agricultural property with much available open space.
s)	the mitigation of greenhouse gas emissions and adaptation to a changing climate	The Proposed Development will account for energy efficiencies in its design.

In summary, it is our opinion that the proposed development and the implementing Zoning By-law Amendment Application have regard for matters of public interest.

4-2 PROVINCIAL PLANNING STATEMENT, 2024

The Provincial Planning Statement ("PPS"), 2024 is a province-wide policy document that sets the foundation for regulating development and land use. The PPS is issued under Section 3 of the *Planning Act*. The PPS "sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians." The document is to be read in its entirety, and all relevant policies must be considered. Municipal official plans are the most important vehicle for implementing the PPS and achieving comprehensive, integrated, and long-term planning.

The following section provides a summary of the policy directives that are relevant to the Proposed Development and associated Applications.

Creation of Healthy and Livable Communities

The PPS, in Section 2.1.6, states that planning authorities should support the achievement of complete communities by:

- a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*

- b) *improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and*
- c) *improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.*

Housing

Section 2.2 of the PPS speaks explicitly to considerations for housing, including intensification, redevelopment and the provision of an appropriate range and mix of housing types and densities. Section 1.4.3 states that planning authorities shall provide for a mix of housing types and densities by:

Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a) *establishing and implementing minimum targets for the provision of housing that is affordable to low- and moderate-income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;*
- b) *permitting and facilitating:*
 - 1. *all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
 - 2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- d) *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*

Rural Areas

Section 2.5 of the PPS sets out policies related to rural areas in the Province, and acknowledges that healthy, integrated and viable rural areas should be supported by:

- a) *building upon rural character, and leveraging rural amenities and assets;*
- b) *promoting regeneration, including the redevelopment of brownfield sites;*
- c) *accommodating an appropriate range and mix of housing in rural settlement areas;*
- d) *using rural infrastructure and public service facilities efficiently;*
- 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;*
- g) conserving biodiversity and considering the ecological benefits provided by nature; and*
- h) providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.*

Agriculture

Specific policies for agricultural areas are provided in Section 4.3.1 of the PPS. Permitted uses are generally limited to (Section 4.3.2) agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance.

The PPS defines “agricultural uses” as:

means the growing of crops, including nursery, biomass, and horticultural crops; raising of livestock; raising of other animals for food, fur or fibre, including poultry and fish; aquaculture; apiaries; agro-forestry; maple syrup production; and associated on-farm buildings and structures, including, but not limited to livestock facilities, manure storages, value-retaining facilities, and housing for farm workers, when the size and nature of the operation requires additional employment.

Section 4.3.3 states that new land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.

Natural Environment

Portions of the Site, to the south of the area intended for development, are protected natural heritage areas. Section 4.1 of the PPS states that natural features and areas shall be protected for the long term. Development and site alteration shall not be permitted in significant woodlands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

Section 4.1.8 states that development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas unless the ecological function of the adjacent lands has been evaluated, and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions. However, Section 4.1.9 states that no policy in Section 4.1 is intended to limit the ability of agricultural uses to continue.

Planning Analysis

In summary, it is our opinion that the Proposed Development and the implementing Zoning By-law Amendment Application is consistent with the PPS. As outlined in the preamble to the PPS, the policy-led planning systems in Ontario seek to address the complex inter-relationships between the pillars that contribute to good land use planning. This includes agricultural protection, range and mix of housing supply, long-term economic prosperity and the mitigation of climate change.

In our opinion, the proposed use is permitted in the PPS and is considered to be an agricultural use.

The Application has demonstrated consistency with these key directives, or pillars, by:

- Providing efficient use of land to offer a diversity of housing options to meet local agricultural workforce needs
- Providing a compatible and ancillary rural use of land
- Meeting MDS requirements
- Optimizing infrastructure through the use of a shared well and a new on-site sewage system designed to meet the needs of the Proposed Development
- Providing quality housing options for the needed agricultural workforce
- Providing increased setbacks to adjacent natural heritage features

4-3 AUSABLE BAYFIELD MAITLAND VALLEY SOURCE PROTECTION PLAN

The Province of Ontario passed the Clean Water Act in 2006 to ensure clean, safe and sustainable drinking water is available for Ontarians. The intent is to protect water before it enters the municipal drinking water system. All planning decisions shall be in conformity with the policies that address significant drinking water threats as per Section 39 (1) (a) of the Clean Water Act.

The Act established 22 source water protection areas and source protection regions to manage existing and future risks to municipal drinking water sources. The Site is located within the Ausable Bayfield Maitland Valley Source Protection Region and is subject to the policies of the Ausable Bayfield Source Protection Area (2019); however, the area proposed for development is outside the Regulated Area. The Site is not located in any significant groundwater recharge area or on a highly vulnerable aquifer.

4-4 MINIMUM DISTANCE SEPARATION, 2014

The Minimum Distance Separation (MDS) Document is a land use planning tool developed by the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) to prevent land use conflicts and minimize nuisance complaints from odour. The MDS Document consists of a set of guidelines that provide setbacks between sensitive land uses and livestock facilities. As the Site is located adjacent to an agricultural area and the Official Plan Amendment seeks to expand the settlement area, the evaluation of MDS is required by the PPS (Section 1.1.3.8).

Guideline #2 states that minimum distance separation distances between a new sensitive land use and an existing livestock facility shall comply with the MDS I Guidelines. Guidelines #8 and #10 provide that MDS I setbacks are necessary for lot creation and/or Official Plan and Zoning By-law Amendments. Guidelines #33 and #34 define land uses which are Type A (Less Sensitive) or Type B (More Sensitive).

The uses within Proposed Development fall into the Type A given it is an agricultural/residential house on an existing lot. MDS I calculations were carried out and found that the Site and was found to comply, except for the existing horse barn to the immediate west of the Site. A MDS setback of 164 metres is required; however, the proposed dwelling is 156 metres from the livestock facility. This

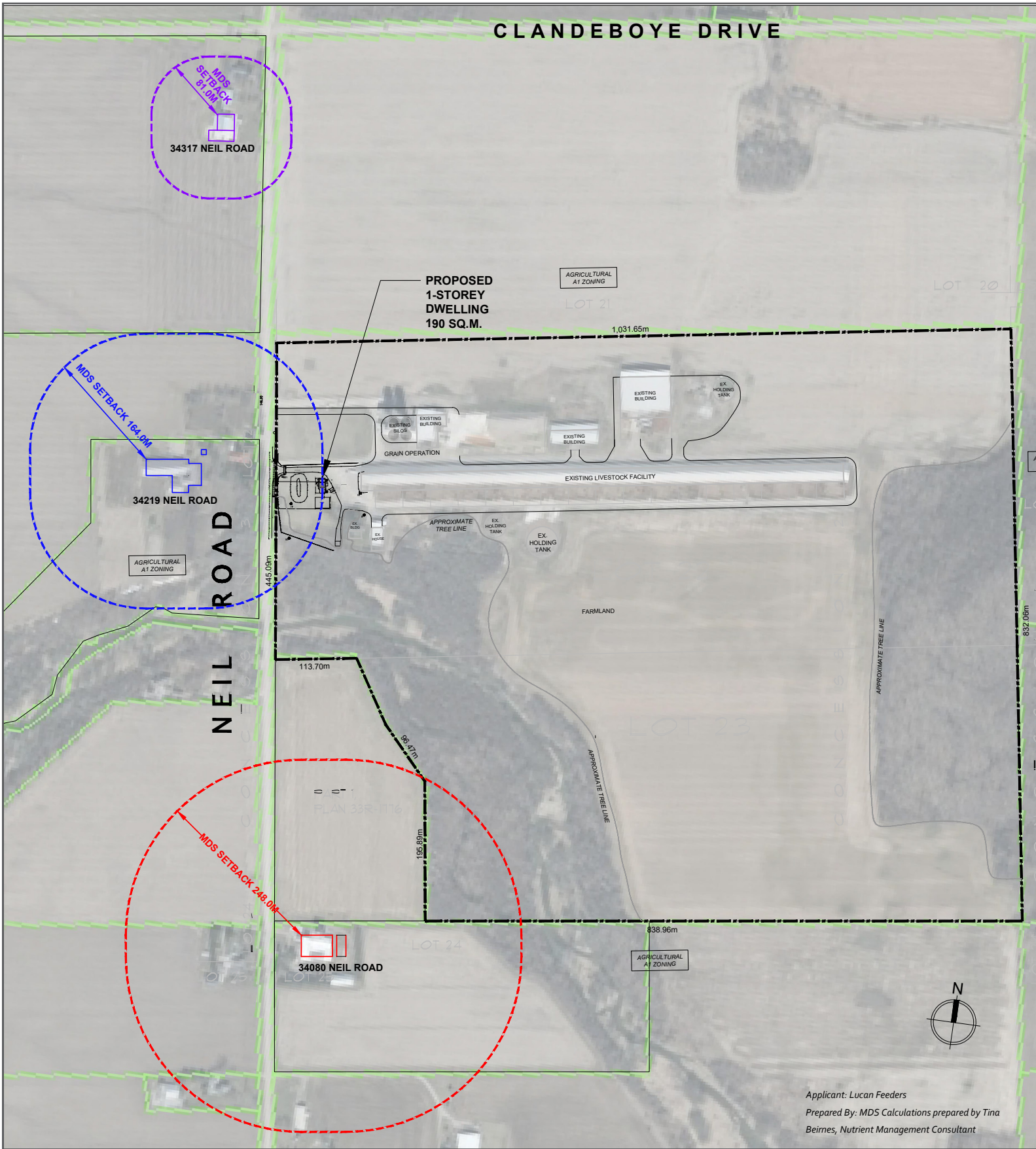


Figure:

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MINIMUM DISTANCE SEPARATION

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON



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is a reduction of 6 metres; however, the Owner is requesting a reduction of 14 metres, to provide some degree of flexibility on the ultimate siting of the new dwelling on the Site at the time of the building permit application.

In our opinion, the reduction is minor, even at a 14.0 metre reduction in the buffer as the odour potential from the operation on the Site, with 12,000 cattle, is anticipated to surpass the potential from a barn with 30 horses that is located further from the existing and proposed dwelling on the Site and will have no negative impact on the adjacent agricultural operation.

4-5 MIDDLESEX COUNTY OFFICIAL PLAN, 2023

The purpose of the County of Middlesex Official Plan ("County OP") as stated in Section 1.3, is that it is one tool to be used in working towards a long-term vision for the County. The County OP establishes an upper tier policy framework, providing guidance to local municipalities in preparation of Official Plans and Zoning By-laws.

The Site is designated as "Agricultural Area" on Schedule A of the County OP (Figure 6), with the southern area of the Site identified on Schedule "C" as "Natural Heritage System".

Policies for Agricultural Areas are provided in Section 3.3 of the County OP, including permitted uses which include agricultural and related uses (Section 3.3.3). The County OP defines "agricultural use" as the:

Growing of crops, including nursery, biomass and horticultural crops, raising of livestock and other animals for food, fur, or fibre, including poultry and fish, aquaculture, apiaries, agro-forestry, maple syrup production, and associated on-farm buildings and structures, including, but not limited to livestock facilities, manure storages, value-retaining facilities, and accommodation for full-time farm labour when the size and nature of the operation requires additional employment.

Section 2.3.9 of the County OP expands on the policies related to permanent residential units for farm labour, stating that they are permitted if grouped together with existing farm buildings. Local municipalities are encouraged to include policies in their official plans addressing considerations, including demonstration of need, minimizing the loss of agricultural land, building size, adequacy of services, access, and Minimum Distance Separation.

The need for housing to support the labour market is outlined in Section 2.3 of the County OP to ensure that there is a sufficient labour force and a reduced need for commuting.

Section 2.3.10 of the County OP addresses natural heritage policies and states that a Development Assessment Report may be required within 120 metres of a natural heritage feature. Through pre-consultation discussions with staff, a Development Assessment Report has not been requested, and it is noted that the PPS provides for agricultural uses proximate to natural features. The proposed new building is also approximately 50 metres from the closest portion of the feature mapped on the County OP.

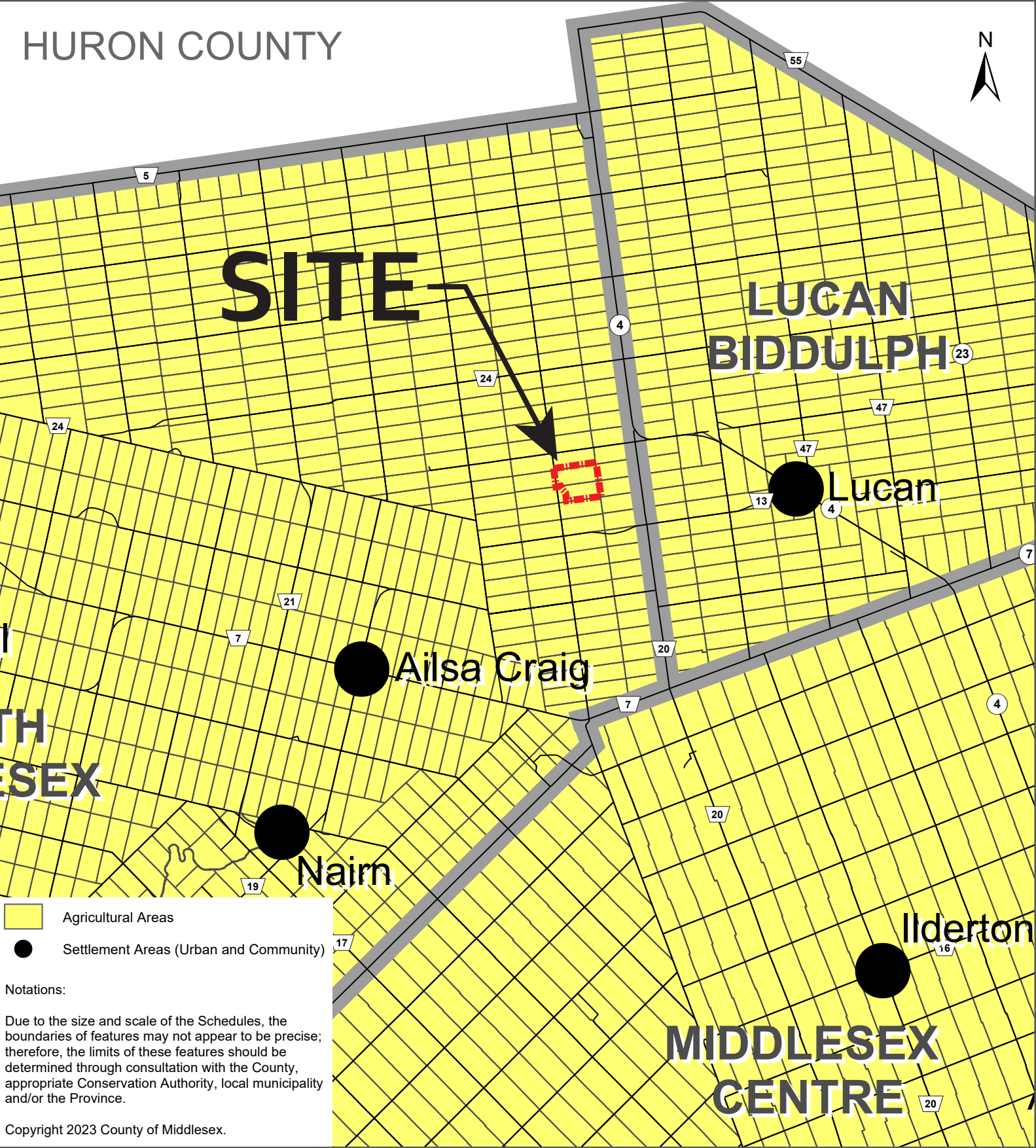


Figure:
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**COUNTY OF MIDDLESEX
OFFICIAL PLAN**

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON

Planning Analysis

It is our opinion that the Application conforms with the County OP as the use is explicitly permitted within the agricultural area and the Proposed Development, does not require the creation of new lots, and will provide housing opportunities to support and sustain the agricultural sector. A minor reduction is required for the MDS setback to the adjacent horse farm, and the justification for the reduction is provided above.

In our opinion, the size of the agricultural operation supports the need for housing options on the Site. The Site includes approximately 12,000 cattle and a grain elevator, which requires 20 employees working on at least two (2) shifts. It is understood from the Owners that night-time work can be required, and given the size of the livestock facility, a greater number of employees are required. The Owner has also confirmed that the new building will provide security to the Site, with “eyes on the street” from the new building to Neil Road.

Further, it is noted that:

- The proposed use will utilize an existing driveway access to a road, maintained all year;
- The new building is clustered to the front of the Site, proximate to the existing dwelling and livestock facilities;
- There are five (5) existing wells on the Site that can be utilized to service the new building;
- A new septic system will be provided in close proximity to the new structure.

4-6 MUNICIPALITY OF NORTH MIDDLESEX OFFICIAL PLAN, 2003

The Municipality of North Middlesex Official Plan (“OP”), adopted in 2003, consolidated November 2023, contains the goals, objectives and policies to manage and direct physical change and the effects on the social, economic and natural environment of the Municipality or part of it.

Schedule “A” to the OP designates the Site as “Agricultural Area” with a “Hazard Areas” overlay (Figure 7). Schedule “C” identifies the Hazard Area as “Woodlands”.

The portion of the Site intended for the Proposed Development is designated as “Agricultural Area”. The OP policies are designed “to protect agriculture from the intrusion of incompatible uses, such as non-farm related residential dwellings and other uses that are sensitive to contemporary agricultural practices.”

Section 3.1 states that a healthy and sustainable future will be achieved for North Middlesex, amongst others by enhancing agriculture and economic development. The OP is intended to provide flexibility to accommodate the evolution of the agricultural industry. Further, Section 3.3.3 states that it is an objective of the OP to promote the viability of farm operations, ensuring their continued economic strength, wherever possible.

Permitted uses within Agricultural Areas, as set out in Section 6.4, includes farming, agriculture and agriculturally-related uses. Agricultural uses are defined by the OP as:

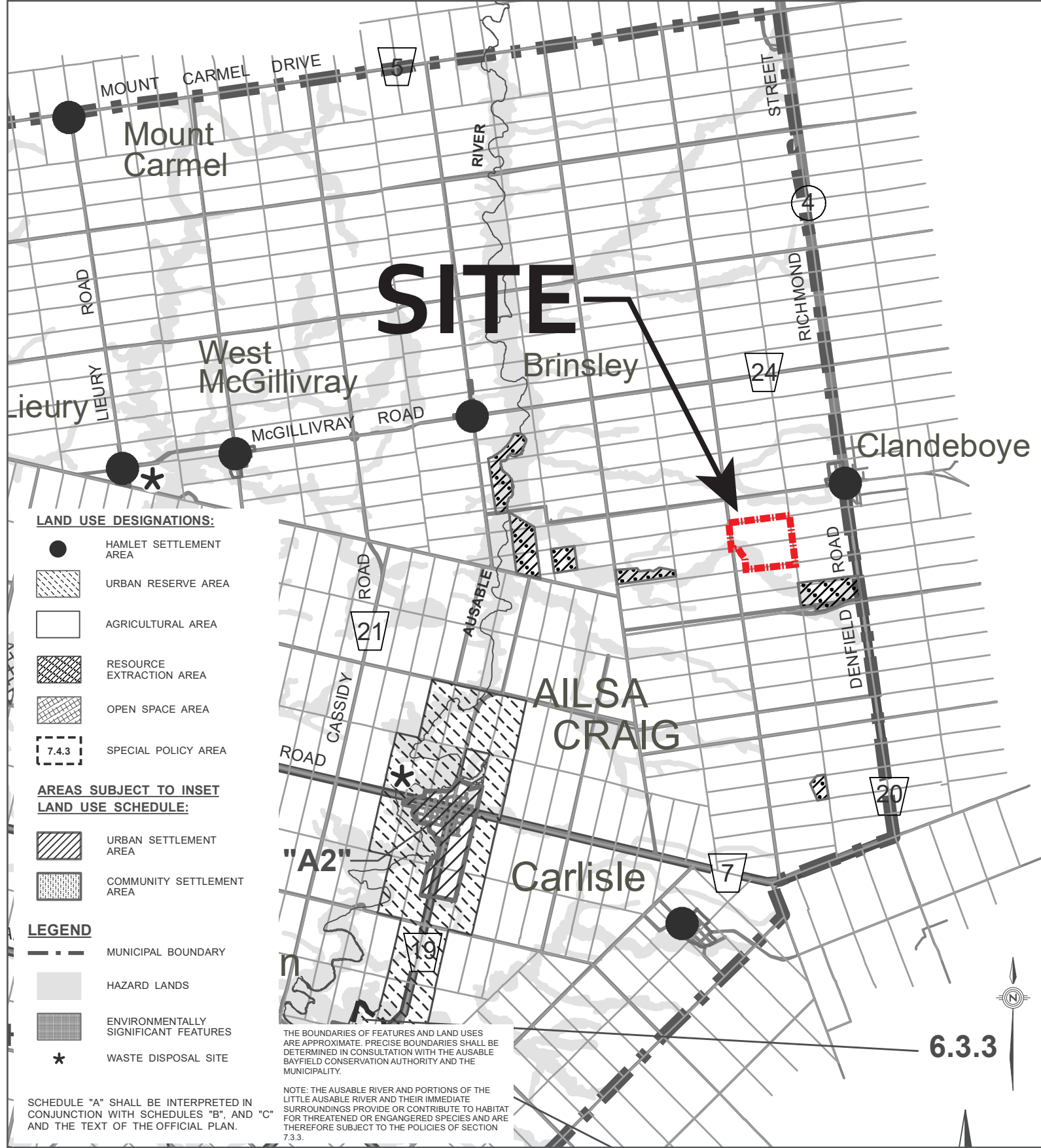


Figure:

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MUNICIPALITY OF NORTH MIDDLESEX OFFICIAL PLAN

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON

means the growing of crops, including nursery and horticultural crops; raising of livestock; raising of other animals for food, fur or fibre, including poultry and fish; aquaculture; apiaries; agro-forestry; maple syrup production; and associated on-farm buildings and structures, including accommodation for full-time farm labour when the size and nature of the operation requires additional employment.

All permitted uses on land designated agriculture, whether farm or non-farm, will comply with the Minimum Distance Separation formulae, and that MDS I provide requirements for new development from existing livestock facilities (Section 6.2 f)).

Section 7.3.4 of the OP outlines the policies for natural heritage features. Development or site alteration proposed within or adjacent to a natural feature is prohibited, unless it can be shown that there will be no negative impact. The associated table to Section 7.3.4 states that the extent of adjacent lands is 10 metres from the dripline of the defined woodland. As noted, the area on the Site proposed for development is approximately 50 metres from the treed area. In our opinion, no further natural heritage assessment is required.

Planning Analysis

It is our opinion that the Proposed Development and the implementing Application conform to the OP as a permitted agricultural use. The Proposed Development provides for the accommodation of full-time farm labour required to support the scale of agricultural use on the Site.

The scale of Lucan Feeders and the required number of workers is such that additional housing is required, which is affordable and proximate to the operation. It is further noted that the Owners require support from their employees on a shift basis, and evening hours are required. Therefore, the proximity of the housing in this regard is of the utmost importance. The Owners have also noted that, given the size and scale of the operation, the presence of staff on-site is critical for safety and monitoring who is entering and exiting the Site.

The Proposed Development provides for a consolidated and effective use of land area on-farm to accommodate workers' housing, while minimizing the land area required and generally complying with MDS criteria.

The Proposed Development will be serviced by an existing well, and the proposed sewage treatment system will go through the required approval processes.

4-6 MUNICIPALITY OF NORTH MIDDLESEX ZONING BY-LAW, 2004

The Municipality of North Middlesex Zoning By-law ("By-law"), adopted in 2004, and consolidated as of November 2024, zones the Site as "General Agriculture Zone (A1)". There is an approximate limit of hazard lands over the area of the Site that is identified in the OP as "Woodlands" (Figure 8).

Section 7.1 identifies the following permitted uses in an A1 Zone, amongst others:

- accessory use

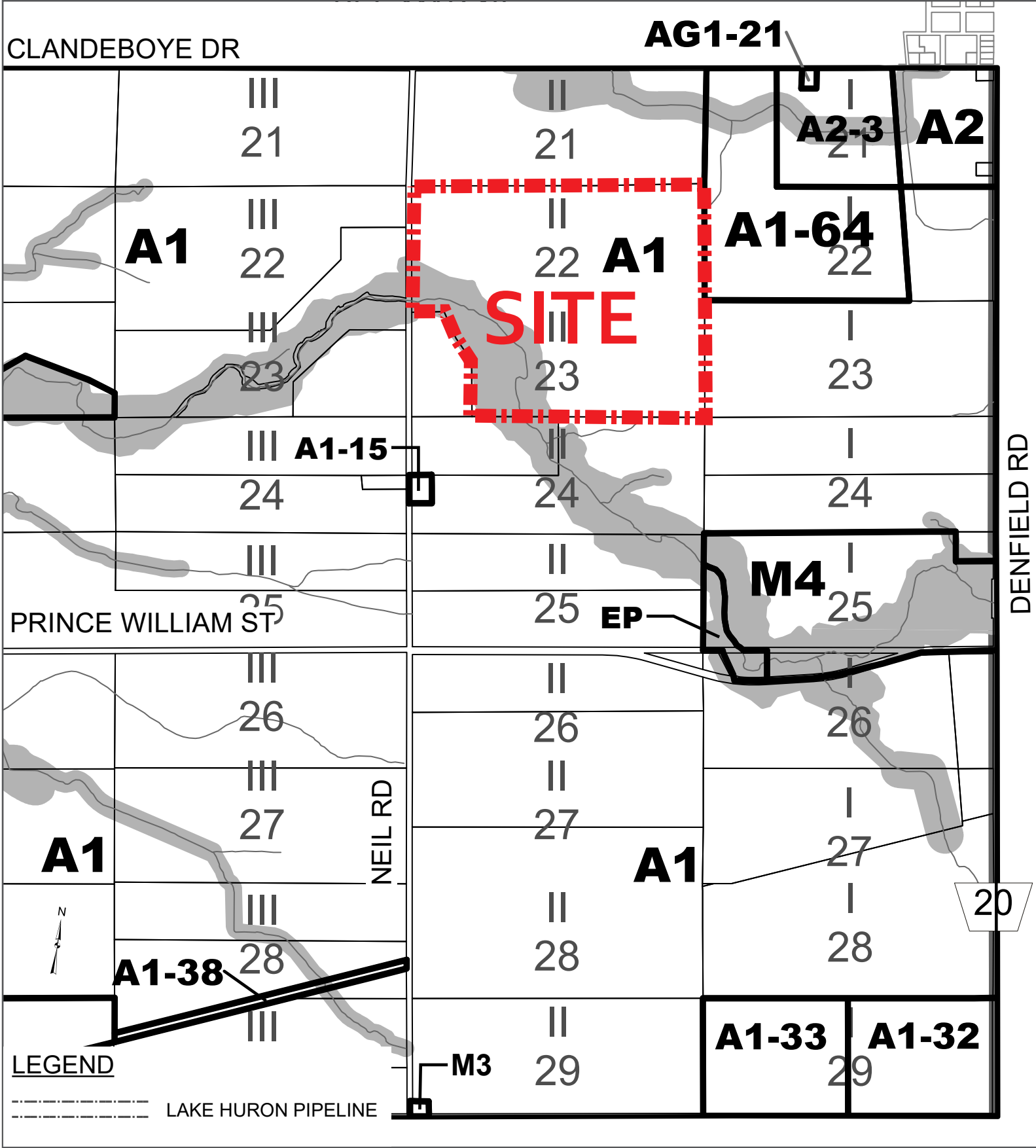


Figure:

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NORTH MIDDLESEX ZONING BY-LAW

Site Location: 34210 Neil Road, Municipality of North Middlesex, ON



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- agricultural use, intensive
- agricultural use, non-intensive
- on-farm secondary business
- single detached residential dwelling on an existing lot of record

The following zone standards apply in the A1 Zone, and it is confirmed that the Proposed Development complies with all provisions:

- a) Minimum lot frontage: 150.0 m
- b) Minimum lot area: 39.0 ha
- c) Minimum front yard setback: 20.0 m
- d) Minimum rear yard setback: 20.0 m
- e) Minimum interior side yard setback: 15.0 m
- f) Minimum exterior side yard setback: 15.0 m
- g) Maximum height of an accessory building 10.5 m

A site-specific zone is proposed for the Site to permit the Proposed Development and implement the PPS, County OP and OP policies for permanent housing to support farm labour (Figure 9). In our opinion, the proposed Zoning By-law Amendment to provide site-specific regulations is appropriate for the following reasons:

- The Proposed Development is defined as an agricultural use and provides support to the existing agricultural operation;
- The primary agricultural use on the Site is livestock, which requires workers to be employed year-round and therefore requires permanent housing options;
- There is a cluster of housing proximate to the livestock facilities;
- The Proposed Development is required to provide housing for the needed workforce to sustain and enhance agriculture operations;
- The Proposed Development demonstrates effective use of land with the intensification of on-site housing units;

As noted in this Planning Justification Report, a minor reduction in the MDS I setbacks is required; however, the on-site odour with 12,000 cattle is anticipated to exceed the odour source from the adjacent horse farm with a capacity of 30 horses.

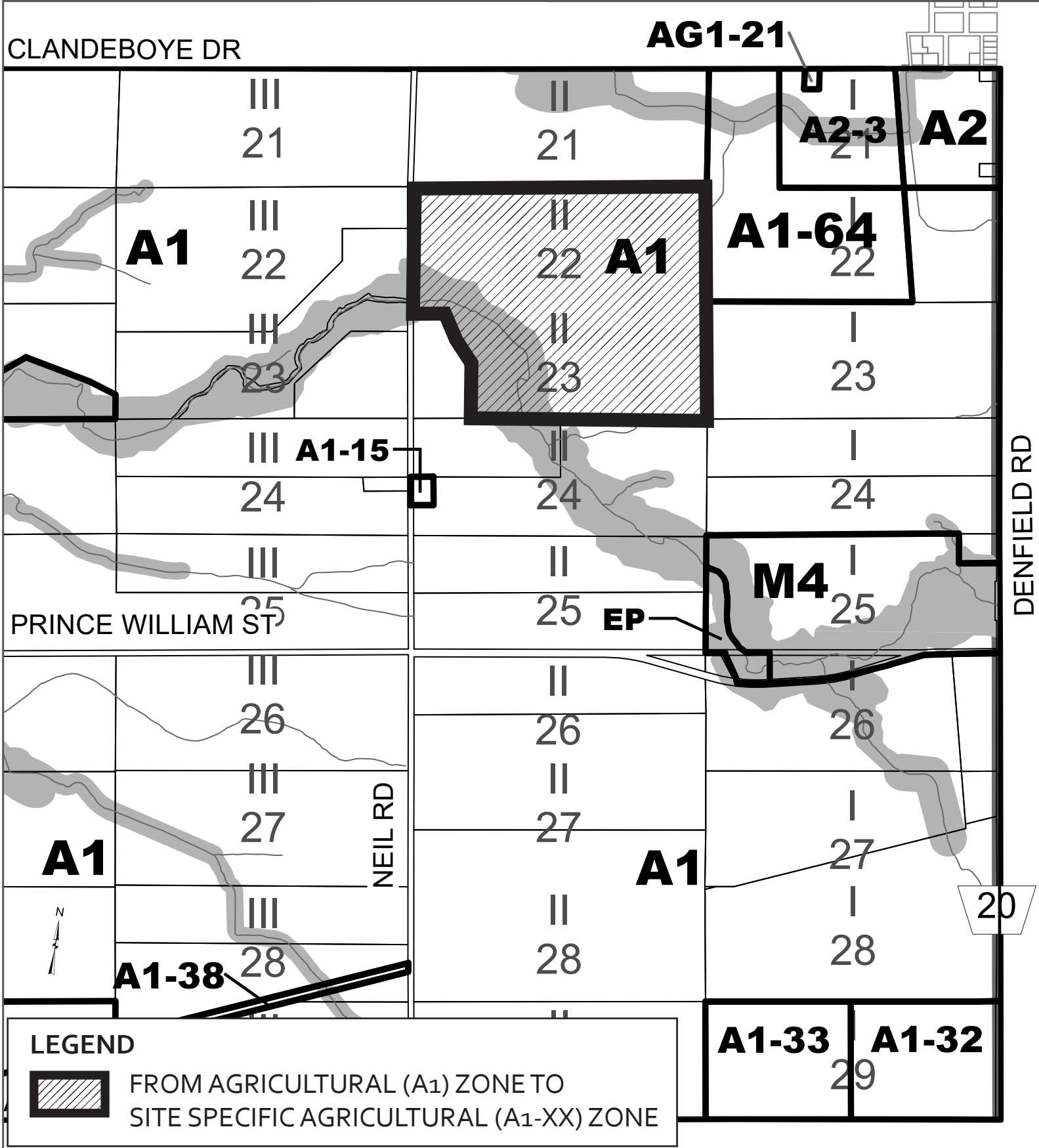


Figure:



5 SUMMARY

Lucan Feeders is proposing on-farm housing to be occupied year-round. The space will provide permanent on-farm housing for the needed agricultural workforce, in turn addressing broad-ranging challenges with housing affordability and workforce shortages, all with the premise of enabling and sustaining enhanced agricultural operations. To permit the Proposed Development, the Owner is seeking a Zoning By-law Amendment from the Municipality of North Middlesex.

Based on the foregoing analysis, it is our opinion that the Proposed Development and the implementing Zoning By-law Amendment are appropriate, in the public interest and represent good land use planning. This opinion is supported by the following:

- The Application is consistent with provincial policy by providing support for continued agricultural use within a prime agricultural area and meeting the local need for an agricultural workforce;
- Providing a compatible and ancillary rural use of land that will not require the creation of any new lots;
- Generally meeting MDS requirements;
- Optimizing infrastructure through the use of a shared well and a new on-site sewage system designed to meet the needs of the proposed development; and,
- Conforms to both the County OP and the OP, as providing accommodation for full-time farm labour is a permitted agricultural use.