GUIDING FARMERS THROUGH AGRICULTURAL PLANNING APPLICATIONS
A MAJOR RESEARCH PAPER

FOR PROFESSOR JOHN FITZGIBBON
BY ANDREW PAYNE
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List of Abbreviations

CWA – Clean Water Act, 2006
GH – Golden Horseshoe
GHFFA – Golden Horseshoe Food and Farming Alliance
MMAH – Ontario Ministry of Municipal Affairs and Housing
MOECC – Ontario Ministry of Environment and Climate Change
NEPA – Niagara Escarpment Plan Area
NEPDA – Niagara Escarpment Planning & Development Act
OFA – Ontario Federation of Agriculture
OMAFRA – Ontario Ministry of Agriculture, Food & Rural Affairs
ORMA – Oak Ridges Moraine Act, 2001
ORMPA - Oak Ridges Moraine Plan Area
PPS – Provincial Policy Statement, 2014

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Introduction

The agricultural sector in the Golden Horseshoe is integral not only to Ontario’s economy, but for its food security, its growth plans, and to the province’s rural culture. According to the Golden Horseshoe Food and Farming Alliance (GHFFA), the GH alone contains, “in excess of 6,000 farms with almost a million acres of farmland producing over 200 commodities for local and international markets and generating an estimated annual economic impact on the provincial economy of $6.3 billion” (GHFFA, 2014). In 2016 the ‘primary agriculture’ sector in Ontario contributed roughly $4.3 Billion CAD constituting more than 3% of what Ontario’s Goods-Producing Industries contribute to the province on a yearly basis (OMAFRA, 2016). Therefore, it is more than fair to argue that the agricultural sector in Ontario is deserving of significant government resources and fair regulatory policy that both supports the industry and protects farmland.

However, there is a large following within the agricultural sector that does not feel the industry is getting the policy it deserves. While some argue that the somewhat unilateral policy surrounding the greenbelt restricts landowners’ property rights (Pond, 2009, pp. 251), others within the sector argue that municipalities have been given the power to define which agricultural uses are permissible and which are not. It is clear that from the agricultural sector’s perspective, there are significant land-use policy-related barriers faced by agricultural businesses in Ontario. These barriers are often referred to by farmers as “Red Tape”.
Background: Best Practices in Land Use Planning for Food and Farming Businesses in the Golden Horseshoe

A recent study, *Best Practices in Planning for Food and Farming Businesses in the Golden Horseshoe*, identified (through case studies, key informant interviews, focus groups and round table meetings) 182 of these “Red-Tape” land use planning related barriers faced by farmers in the Golden Horseshoe. The study revealed that these barriers exist in a range of areas related to land use planning-related processes. From interactions with planners themselves to accessing planning application-related information to delays to projects waiting for approvals, this project clearly indicates that planning-related barriers faced by farmers occur frequently and often without attempts at prevention. In the boxes below the key findings from this project are listed to exemplify the motivation behind undertaking the ‘Guiding Farmers Through Agricultural Planning Applications’ research project.
Key Findings from *Best Practices in Planning for Food and Farming Businesses*

The project *Best Practices in Planning for Food and Farming Businesses* was performed by three University of Guelph Graduate Students, Khulsan Khan, Brayden Lebawski and Andrew Payne, from January to April 2017. Using a desk review, case studies and an experts’ round table as their research methodologies, the group was tasked with:

a) Revealing barriers faced by farmers within current land-use planning practices, including but not limited to the agricultural land-use planning application process.

b) Developing a set of best practices that would prepare and guide farmers through land-use planning processes such as the above-mentioned application process.

The group was to perform these tasks under the guidance of their professor, Wayne Caldwell and the executive director of the Golden Horseshoe Food and Farming Alliance (GHFFA).

The group used a desk review to achieve two goals: a) to reveal existing barriers faced by farmers within provincial and municipal legislation; b) to locate existing documents meant to address these barriers. The group also used the opportunity of being asked to speak at a GHFFA working group meeting to perform an impromptu focus group. The working group was asked to list off some of the barriers they knew were faced by farmers while engaging in land-use planning processes. The desk review and focus group revealed several common themes amongst the barriers and determined that the barriers could be sorted into four categories: attitudinal, process-related, informational and communicational.

In order to research how the various stakeholder groups interacted and how these barriers come to be, the research group set out on three case studies from across the Golden Horseshoe. A dairy farm in Durham Region, a microbrewery in Hamilton and a value-added lavender farm in Halton Region were chosen as the cases.
Key Findings from *Best Practices in Planning for Food and Farming Businesses (Cont.)*

1. No short documents explaining the province's agricultural permitted uses or how the agricultural applications process works currently exist.

During the desk review the group searched for existing short documents meant to guide farmers through planning processes. The group discovered that there are medium to long documents designed to explain agricultural planning processes to farmers (seen in figure _ with each documents' strengths and weaknesses relative to the barriers described in the project). However, the search did not reveal any short documents aimed at guiding farmers through planning applications.

1. **OMAFRA: Guidelines on Permitted Uses**  
   - OMAFRA's document aimed at guiding those who own Agricultural-zoned land through how the province's 'permitted uses' system works.  
   **Strengths:** a) 'Permitted uses' explained in a clear and accessible way; b) examples of permitted uses provided; c) information on 'non-permitted uses' and why they are not permitted provided.  
   **Weaknesses:** a) 'on-farm diversified' uses based on interpretation; b) municipal consistency under-explained; c) 65 pages long.

2. **MMAH: Citizen's Guides to Land Use Planning**  
   - MMAH's citizen guides are aimed at educating citizens of the public about general planning processes.  
   **Strengths:** a) gives overview of planning processes, not just applications; b) highly accessible writing; c) provides insight on provincial motivations behind relevant legislation.  
   **Weaknesses:** a) doesn't provide instruction on agriculture; b) some sections overly technical; c) around 60 pages long.

3. **OFA Guide to Supporting Agricultural Growth in your Municipality**  
   - OFA's guide aimed to help planners enact initiatives aimed at supporting agricultural growth in their municipalities.  
   **Strengths:** a) relatively concise; b) gives planners step-by-step guidance; c) sets farmers up for business success.  
   **Weaknesses:** a) aimed at planners, not farmers; b) heavy on planning language; c) 10 pages long (still too long).
Key Findings from *Best Practices in Planning for Food and Farming Businesses (Cont.*)

2. The most-repeated complaint about the application process is that it represents a major time investment for farmers. The case studies and experts’ round table revealed why the process takes so long:

   a) Conformity exercises were identified as a barrier indirectly faced by farmers that can result in major delays in the application process.

   Conformity exercises in a nutshell are the exercises undertaken by municipalities in efforts to bring their Official Plans up to date. That is, municipalities must bring their official plans into conformity with the current version of the Provincial Policy Statement and any other plan or regulation that has been updated/applies to the given municipality. This process is performed on a 5-year cycle. Most municipalities take at least 5 years to come into conformity each cycle. This means that planning resources that might otherwise be spent on applications are spent on conformity exercises, creating a backlog of applications to be tested.

   b) Some applications have to be tested against official plans, as well as several other rounds of testing against other legislation such as provincial plans and MDS formulae and through bodies such as conservation authorities or the public. This takes time.

   Depending on where the proponent is situated, what features exist on their land, and what the proponent is applying to do, their application may have to go through several rounds of testing. Therefore, some applications take longer than others, and most will take more time than the proponent would like.

   c) Most municipalities face a major influx of applications, especially at certain times of the year.

   When it comes to agricultural planning applications in particular, municipalities experience major fluctuations in the volume of applications received. For example, most farmers are busy through the Spring, Fall and Autumn seasons. This results in major backlog in a lot of rural municipalities during those seasons.
Key Findings from *Best Practices in Planning for Food and Farming Businesses* (Cont.)

3. Many lessons about the Golden Horseshoe’s agricultural sector can be learned from the barriers mentioned.

   For example, attitudinal barriers may not have been avoidable as more and more “red tape” documents became enforced since 2000. Some examples of provincial acts/plans that directly influence farmers on agriculturally zoned land include:

   2. The Nutrient Management Act, 2002
   3. The Clean Water Act, 2006
   4. The Oak Ridges Moraine Conservation Act, 2001

The Niagara Escarpment Plan was developed in 1990, but in many regards, it is perceived as “red tape”, not unlike those listed above.

   From government’s perspective, the necessity for each of the above – mentioned acts is undeniable. The rationales for protecting prime agricultural land from exhaustive or damaging uses and for conserving sensitive ecological areas do not require explanation or argument. However, it cannot be denied that implementing one act after another that seemingly targets one industry is going to have a negative impact on that industry. The barriers that those in the agricultural sector face across the golden horseshoe can be best exemplified from attitudinal, process-related, informational and communicational viewpoints.

*Note: Summaries of the barriers drawn from the focus group, case studies and expert’s round table can be seen represented visually in charts in Appendix A of this paper.*
From the *Best Practices in Land Use Planning for Food and Farm businesses in the Golden Horseshoe* project, several research questions present themselves. Key finding #1 found that there was no short guiding document related to agricultural planning processes, but 1) why isn’t there a short document that guides farmers through agricultural planning applications? If it is known that wait times are a problem as demonstrated by key finding #2, 2) what is being done about wait times for agricultural planning applications? It is clear that from a regulatory perspective, the agricultural sector has been inundated with plan after plan and new regulation after new regulation. So, 3) what do ag. businesses think of how planning regulation impacts their business? Is there a way to address this simply?

The above-mentioned research questions provide a foundation for the qualitative research project reported on in the paper to follow. Deliverables for said research project include:

a) a report on the project that addresses the above research questions, including sections on the key informant interview methodology employed;

b) the report will also include sections that introduce the short document deliverable described below, including reference to key informant interviews;

c) a short (one page, double-sided) document that guides farmers through planning applications delivered to the GHFFA, who are funding the research.
The deliverables, once completed, will be submitted to advisor Dr. John FitzGibbon of the School of Environmental Design and Rural Development (UofG) and advisory committee Dr. Wayne Caldwell of the School of Environmental Design and Rural Development (UofG).

**Methodology**

This project has used Key Informant Interviews (KIIs) with experts on land use planning from the agricultural sector in the GH as its research methodology. Interviewees were sorted into three major stakeholder groups: representatives from the GH’s Farm Organizations, Policy Makers and Planners. In the Farm Organizations group, representatives from the GHFFA, the Ontario Federation of Agriculture and from Farm and Food Care were interviewed. In the Policy Makers group, experts from the two provincial ministries most closely linked to agricultural land use planning - OMAFRA and MMAH - were interviewed. Finally, planners from the University of Guelph and municipalities across the Golden Horseshoe were interviewed in the planners group. A list of interviewees organized by stakeholder group can be found in figure 1 below.

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<th>List of Interviewees Organized by Stakeholder Group</th>
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<tbody>
<tr>
<td>Name</td>
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<tr>
<td><strong>Farm Organizations</strong></td>
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<tr>
<td>Janet Horner</td>
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<tr>
<td>Danielle Collins</td>
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<tr>
<td>Peter Jeffrey</td>
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<tr>
<td>Bruce Kelly</td>
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<tr>
<td><strong>Policy Makers</strong></td>
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Table 1: List of interviewees organized by stakeholder group.

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<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Role</th>
<th>Contact Method</th>
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<tbody>
<tr>
<td>John Turvey</td>
<td>OMAFRA</td>
<td>Policy Advisor (Land Use Planning)</td>
<td>In Person</td>
</tr>
<tr>
<td>Arthur Churchyard</td>
<td>OMAFRA</td>
<td>Policy Advisor (Environmental and Land Use Policy)</td>
<td>In Person</td>
</tr>
<tr>
<td>Jocelyn Beatty</td>
<td>OMAFRA</td>
<td>Planner (Land Use Policy and Stewardship)</td>
<td>Via email</td>
</tr>
<tr>
<td>Anna Kalnina</td>
<td>MMAH</td>
<td>Planner</td>
<td>Via email</td>
</tr>
<tr>
<td>Ben Roberts</td>
<td>Town of Caledon</td>
<td>Manager, Business Development, Tourism &amp; Culture</td>
<td>Via Telephone</td>
</tr>
<tr>
<td>Mitch Morawetz</td>
<td>Municipality of Clarington</td>
<td>Planner, Development Review</td>
<td>Via Telephone</td>
</tr>
<tr>
<td>Melanie Williams</td>
<td>Region of Peel</td>
<td>Principal Planner, Research &amp; Analysis</td>
<td>Via Telephone</td>
</tr>
<tr>
<td>Rick Reitmeier</td>
<td>Region of Halton</td>
<td>Senior Planner</td>
<td>In Person and via Telephone</td>
</tr>
<tr>
<td>Wayne Caldwell</td>
<td>University of Guelph</td>
<td>Professor, AVP OMAFRA – UofG Research Partnership</td>
<td>In Person</td>
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Three sets of interview questions were created, each one geared toward a different stakeholder group. Each set of questions was organized by three subsections, with each subsection focusing on one of the three research questions outlined in the introduction of this paper. It was (correctly) anticipated that each stakeholder group would need to be lead down different paths of questioning to obtain informed responses to the questions. For example, planners did not require the same amount of prompting to confirm they understood what was meant by the ‘permitted uses’ as outlined by OMAFRA as other stakeholder groups did, since the planners interviewed had daily exposure to (and would make daily use of) the document in
question. On that same note, representatives of farm organizations did not require a long line of questioning to get at what the key land-use planning related barriers experienced by ag. businesses (since that is regularly discussed between farm organization representatives and clients).

Each set of questions was also organized to make the interviews flush out questions related to one research question more than the other two, organized by stakeholder group based on the anticipated relevance of the question being asked: Farm Organizations were asked more questions related to research question number three than the other research questions, since that research question is best answered by those representing ag. businesses. Planners were asked more questions about research question number 1 than about the other research questions, since that question can best be answered by planners in practice. Finally, policy-makers were asked more questions about research question number 2 because that is the level of government that defines, for example, how long a cycle municipalities have to complete their conformity exercises. That being said, each stakeholder group was asked questions pertaining to each of the three research questions to gain as strong a response as possible.

Finally, the interview questions themselves changed throughout the interview process. The questions changed for one of three reasons:

1. The question could be asked in a more succinct, or more grammatically-correct way;
2. The question was answered, and needed to change to answer other questions branching from said question.

3. The question was answered differently and needed further clarification to be effective.

Although the questions changed in structure, their topic remained relatively unchanged to encourage consistency from one interview to the next. Answers from one interview to the next were not repeated to respect the privacy of all interviewees.

**Why Isn’t There a Short Document That Guides Farmers Through Agricultural Planning Applications?**

As should be anticipated, agricultural policy in Ontario is extensive. In fact, since the turn of the millennia, the agricultural industry has had to cope with the implementation of at least 8 major provincial plans (associated with acts listed in figure 1) that significantly impact agriculture in the province. Some of these plans negatively impact the sector directly, while others impact the way the sector does business in a less direct way. It is clear that businesses in agriculturally zoned areas, within the Golden Horseshoe in particular, have experienced a significant influx of new regulation being imposed on them (Caldwell, 2010; Daniels, 1999; Pond, 2009; Parker, 2017; Vyn 2015).

The table below demonstrates specifically how policy impacts the agricultural sector in Ontario, but as a whole it also demonstrates that the province has become much more heavily regulated over the course of the last two decades. The Planning Act, the Greenbelt Plan and the
Greater Golden Horseshoe Growth plan tend to receive the most attention from critics as they have the broadest and most direct impact on the sector. NEPA, ORMA and the CWA aren’t usually focused on as policies that represent barriers specifically for the Agricultural industry, but they certainly have peripheral impacts on the sector.

<table>
<thead>
<tr>
<th>Name of Policy</th>
<th>Associated Ministry</th>
<th>“Red Tape” Impact on Ag. Sector</th>
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<tr>
<td>The Planning Act, 1990</td>
<td>MMAH</td>
<td>• Provides framework for ag. land-use planning, thereby setting the limitations for ag. land use.</td>
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<td>• The PPS has been criticized for making farmland preservation more “dependent upon the cooperation of local municipalities” (Caldwell, 2010).</td>
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<tr>
<td>The Greenbelt Plan</td>
<td>MMAH</td>
<td>• Under the Greenbelt Plan, agricultural land cannot be sold to developers for purposes outside of for agricultural uses. This has stalled demand for agricultural land within the Greenbelt (Pond, 2009).</td>
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<td>• The Greenbelt Plan has resulted in the leap-frog effect taking hold: being unable to develop in much of the greenbelt, developers look to the areas beyond the greenbelt for lands to purchase for development (Pond, 2009; Vyn, 2015).</td>
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<td>• The provincial government has been accused of using the greenbelt as a means of political management (Pond, 2009).</td>
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<td>Policy that Indirectly Impacts Ag.</td>
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<tr>
<td>The Greater Golden Horseshoe Growth Plan, 2006</td>
<td>MMAH</td>
<td>• The province outlines policy by which ‘Prime Agricultural Areas’ can be designated in section 4.2 (MMAH, 2006).</td>
</tr>
<tr>
<td>The Greater Golden Horseshoe Growth Plan, 2017</td>
<td>MMAH</td>
<td>• Developers have criticized the plan for its somewhat forced intensification targets. “They argue that it prevents them from building more detached homes and townhomes that would ease some of the pressure on the housing market”, (Canadian Press, 2017, pp. 1).</td>
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| Nutrient Management Act, 2002 | OMAFRA | • Section 6 establishes standards for the management of nutrients associated with agriculture, forcing ag. business to accommodate nutrient management best practices (cost).  
• Section 7 empowers the Lieutenant Governor to:  
  o Regulate Nutrient use.  
  o Regulate Farm animal access to areas where nutrients have been used.  
  o Govern location of feed lots, and farm animal housing.  
  o Restrict farm animal access to water/ watercourses  
  o Govern the storage, disposal and transportation of dead farm animals.  
This creates contention over non-compliance, in that the farmer incurs a mandatory cost whether he complies or not. Compliance comes with the cost of adjusting to appropriate practice, while non-compliance is met with penalties. |
<table>
<thead>
<tr>
<th>Act/Act Title</th>
<th>Ministry</th>
<th>Details</th>
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| Oak Ridges Moraine Act, 2001 | MMAH | • The establishment of the Oak Ridges Moraine Conservation Area came with the designation of areas wherein building and land-use related restrictions are higher than outside of the Area.  
• The ORMA, not unlike NEPDA, is very powerful in terms of Planning Act and Condominium Act-related decisions being made at the municipal level: all decisions made within the ORMCA must conform to the ORMA. |
| The Smart Growth for our Communities Act, 2015 | MMAH | • Under this act “No privately initiated applications to amend a newly adopted Official Plan or a new comprehensive Zoning Bylaw are permitted within 2 years of the coming into force of these new instruments unless sanctioned by municipal council” (Parker, 2017, pp. 1). Meaning privately initiated applications to amend Official Plans or Zoning by-laws are met with considerable “red tape” within those first two years.  
• The act will extend the review cycle for Official Plans from 5 to 10 years. There is some concern that this may result in the “urban boundary expansions and employment land conversions could effectively be frozen” (Parker, 2017, pp.1). |
| Clean Water Act, 2006 | MOECC | • Forces restrictions on businesses near source water.  
• Agricultural industry one of the most impacted industries due to distribution of farms amongst source areas. |

Table 2: How recent policy impacts the agricultural sector in Ontario.
OMAFRA’s Guidelines on Permitted Uses Document

The provincial government has created their own series of documents that attempt to explain how municipalities comply with these policies within the framework of land use planning in Ontario. OMAFRA has provided for public use its Guidelines on Permitted Uses in Ontario’s Prime Agriculture Areas via .pdf on their website (OMAFRA, 2016a). The document is separated into two main sections: ‘permitted uses’ and a ‘beyond permitted uses’. It also contains a helpful FAQ section containing answers to 11 frequently asked questions in the following categories: ‘General’, ‘Compatibility Issues’, ‘Agricultural Uses’, and finally ‘On-Farm Diversified Uses’. Finally, the document contains several figures throughout its text and a brief set of appendices that explain and demonstrate terms and ideas within the guidelines (OMAFRA, 2016b). This document does contain a very generalized version of much of the key information on land-use planning that ag. businesses are likely to require while planning to develop. The FAQ section may be of particular use for ag. businesses as several of the questions being asked may be construed as barriers that may inform best practices.

This document is the perhaps the closest thing to a simplified guide for the use of ag. businesses looking to learn more about how to develop on agriculturally-zoned land. It demonstrates very clearly and thoroughly just what the ‘Permitted Uses’ are, how they were developed and why, and are provided with some semblance of an explanation of how to develop within the guidelines for these uses. However, the document is sixty-four pages long including indexes – a length that might be accessible for some, but for many farmers through
the busy months between April and December. The length of this document disqualifies it as a short document explaining planning applications to ag. businesses.

**MMAH’s Citizen’s Guides to Land Use Planning**

The Ministry of Municipal Affairs and Housing (MMAH) has on its ‘Land Use Planning Resources’ web page a brief list of resources, all of which are authored by OMAFRA, recommended for ‘Agriculture’ (MMAH, 2008). Included in this list are links to the Farming and Food Protection Act, 1998 and the Nutrient Management Act, 2002. The List contains links to three sets of guidelines titled, *Classifying Prime and Marginal Agricultural Soils and Landscapes*, *Guidelines for Detailed Soil Surveys for Agricultural Land Use Planning*, and *Minimum Distance Separation (MDS) Formulae* (MMAH, 2008). This document contains valuable and helpful information for ag. businesses engaged in specific land-use processes – particularly the guideline documents.

The materials here are more accessible than OMAFRA’s *Guidelines on Permitted Uses* in terms of reading length, but they are still wordy averaging roughly 2,000 words per document. They lack infographics that might simplify the process for land users. The Guide lacks a section specified for the Agricultural sector, which seems like an oversight given that this is the sector is perhaps the sector most impacted by the policy being discussed. Finally, the materials offered here do not provide ag. businesses with a comprehensive set of guidelines for engaging in the land-use planning process.
These two documents represent a significant attempt on the province’s behalf to inform and clarify how land use planning in Ontario works to the public. However, both documents fail to summarize the process in a brief enough manner that they could be considered readily accessible to ag. businesses in the midst of developing. This begs the crucial question described in the introduction of this paper, why isn’t there a short document that guides ag. businesses through agricultural planning applications? The following three subsections will examine how interviewees from the different stakeholder groups answer this question.

**Farm Organizations**

Three of four interviewees responded that they did not know why there isn’t a short document that guides ag. businesses through planning applications. Janet Horner of the GHFFA answered, “some municipalities do have a consolidated document designed to prepare applicants for their pre-consult meeting, such as the township of Mulmur’s pre-consultation application form (available here: [http://mulmur.ca/content/departments/planning/pre-consultation-application-form.pdf](http://mulmur.ca/content/departments/planning/pre-consultation-application-form.pdf))” (Horner, 2017). The documents don’t necessarily guide the business through the application process though, disqualifying them from being considered a ‘short document that guides ag. businesses through agricultural planning applications.

According to Bruce Kelly of Farm and Food Care, “ag. businesses are generally aware of the presence of these ‘permitted uses’ – whether they follow them or not is another question. We do our best to spread the idea that yes, policies to protect prime agricultural land from
things like exhaustion in Ontario are necessary for maintaining the sector’s economic consideration and for things like the environment.” (Kelly, 2017). This notion demonstrates two important points: that a) farmers understand that the ‘permitted uses’ exist, and at least some choose to follow them rather than proceed with their use without following protocol; and b) the idea that regulation is in place for the good of the agricultural sector is spread amongst at least some representatives of the ag. sector. The presence of the appetite to follow ‘permitted uses’ protocol in Ontario is an important consideration for future attempts at creating short documents intended to guide ag. businesses through planning applications. Without it, there impact of introducing such documents would be limited.

Policy Makers

When asked about the lack of these short guiding documents, John Turvey of OMAFRA explained “such a document would not be the responsibility of one of the ministries. That responsibility would fall into municipal hands as each municipality would be subject to different PPS, Provincial Plan or other criteria” (2017). He went on to explain that the ‘Guidelines on Permitted Uses Document’ explains ag. land use planning from a ‘big picture’ perspective on purpose, particularly the section on On-farm Diversified uses. The definition for On-farm Diversified uses takes the form of a description rather than a list of permitted and non-permitted uses. The section was written this way on purpose, to allow municipalities with varied interests, applicable regulations and different codes the space required to interpret the definition in such a way that it fits in with these other considerations.
Policy Maker interviewees, similarly to Farm Organization interviewees, were asked about ag. business’ willingness to follow ag. planning protocol. This stakeholder group also confirmed that there is a desire amongst members of the sector to comply with ag. planning protocol. According to Jocelyn Beatty, a planner for OMAFRA, “I find that when I spent time to go into the reasoning and rational behind certain policies, people are more willing to get on board because they can see the whole picture. Understanding policies also gives capacity to ‘work with the system’ and humanizes ‘the system’ a bit more” (2017). This solidifies the position that a short guiding document needs to be created to help ag. businesses comply with the ag. planning protocol in place.

**Planners**

As mentioned above, this research question was focused on heavily in the KIIs with planners, since planners’ familiarity with the documents in question are greatest of any stakeholder group. It is also worth mentioning that because planners would likely benefit greatly by the existence of such a guidance instrument. It stands to reason that they would recognize and understand the reasoning behind its absence.

When asked about the absence of a short document explaining the ag. planning application process to ag. businesses, planners made several suggestions as to why such a document does not yet exist. Mitch Morawetz of Clarington and Ben Roberts of Caledon had similar answers, saying that criteria that these applications vary greatly from municipality to municipality (2017). Mr. Morawetz mentioned as an example that “parts of some municipalities
in the GH will fall under the areas delineated by Greenbelt Plan, the NEPA or ORMPA, while other municipalities may not contain any prime agricultural land whatsoever and will therefore be tested against fewer criteria” (2017). This is an important finding: **municipalities within the GH are subject to different criteria than one another, making it difficult to create a document that consolidates all possible criteria by which ag. planning applications will be tested.**

Rick Reitmeier of Halton Region also made it clear that from one municipality to the next, the tests themselves may be performed differently. “Generally, within Halton Region the lower tier municipalities will send applications that require regional consideration to us (being the upper tier) upon submission of the application. Sometimes though, the lower-tier will choose to deny the application before the Region ever sees it based on their own criteria having been failed. This will vary from one municipality to the next, but it should be acknowledged that there is a lot of variability in terms of order of operations from one municipality to another” (2017). This represents another important finding for the development of any future short documents that guide ag. businesses through planning applications: **the municipalities vary the way they test applications against criteria from one municipality to the next – the order is not set.**

This section has revealed that at least part of the reasoning behind there not being a short document designed to guide farmers through planning applications:

- Municipalities are subject to different criteria from one area to the next;
Municipalities across Ontario do not test applications in a uniform way. Rather various municipalities appear to test applications in a medley of different ways. According to the province, a short document as described would be the responsibility of the municipalities in question. Municipalities have been provided with guidance on how to interpret the ‘permitted uses’, it is up to them to communicate to their ag. businesses how these uses can be appropriately developed in the presence of their respective applicable regulations. Finally, the KIIIs revealed that although such a document does not exist, there appears to be significant appetite for such a document to be developed.

What is being done about wait times for agricultural planning applications?

When asked what barriers do you think exist between ag. businesses and planners?, Rick Reitmeier responded: “the local municipal plans must conform to the Regional plans and the Regional Plan must be consistent with the PPS. The conformity exercises are generally never done at the same time, so there will always be discord between plans and the PPS. This is the first barrier that farmers usually face” (2017). He was speaking, of course, about the impact such activities have on wait times. Some applications experience longer wait times as the staff with the expertise to test the applications have been deployed elsewhere (to work on conformity exercises, for example). Other applications experience lengthy wait times due to wait times associated with extensiveness of the criteria the application is being tested against. Regardless, it is clear that wait times represent a barrier to ag. businesses when it comes to ag. planning applications. The following three subsections will examine how interviewees from
the different stakeholder groups answer the question *What is being done about wait times for agricultural planning applications?*

**Farm Organizations**

According to Danielle Collins, a policy researcher at the Ontario Federation of Agriculture, the OFA would approach the issue of wait times by “working with ministries like OMAFRA to create initiatives to address that issue, or any issue facing farmers in Ontario” (2017). Farm organizations such as the OFA, Food and Farm Care, and the GHFFA have an important, if somewhat peripheral, role in affecting change in the ag. sector. Some farm organizations lobby government, urging it to change aspects of regulation (or to ask them to scrap certain regulation altogether). Other farm organizations such as the OFA have more formal roles when it comes to ag. policy-making – often taking a cooperative role in research and development of initiatives.

**Policy Makers**

Policy Makers have perhaps the most influence over the subject matter of this research question. It is at the provincial level of government that the PPS and other plans to be conformed-to by municipal official plans are developed and implemented. For example, under the Planning Act, 1990 the PPS is the document that defines the parameters of how conformity exercises are to be performed – including how long municipalities will be given to perform
conformity exercises in order to come into compliance with the current PPS. According to John Turvey, a policy advisor at OMAFRA, “the current PPS outlines that all municipalities in Ontario must have their conformity exercises completed on their official plans within a five-year timeframe of the release of the current version of the PPS. I believe it has been proposed for the next version of the PPS that conformity exercises be done over a ten-year cycle rather than a five-year cycle” (2017). The intention of extending the cycle from five to ten years is to provide municipalities with more time to bring their official plans into conformity. It is expected that this will result in municipalities having more time for other tasks such as application testing.

Planners

Planners familiar with ag. planning applications are well aware of the problems associated with wait times experiences by ag. businesses. According to Rick Reitmeier, “you really can’t blame those in the agricultural sector for being upset about wait times and other problems associated with agricultural planning applications. Some farmers will have applied more than one full growing season before their applications for certain uses are returned to them” (2017). While they may be aware of the problems associated with wait times, planners have limited control over the influences that create the wait times in the first place. According to Mitch Morawetz, “planners have been inundated with work caused by those same plans, regulations, etc. that represent barriers to farming businesses”, implying that control over the issue rests with the level of government developing the plans: the provincial government.
What do ag. businesses think of how planning regulation impacts their business? Is there a way to address this simply?

From the previous sections, it is clear that more could be done to clarify (in an accessible manner) how regulations surrounding agricultural land use planning impact ag. business development in Ontario. It has also been made clear that the wait times for agricultural planning application are a significant issue for the sector, and that the impact of the influx of provincial plans, etc. implemented since 2000 have created additional barrier for ag. businesses, particularly in the GH. In order to efficiently address these barriers, the perspective of the ag. businesses on the matter must be understood. So, what do ag. businesses think of how planning regulation impact their businesses? Is there an apparent way to address this?

Farm Organizations

Interviews with representatives from the Farm Organization stakeholder group revealed several items relevant to this research question. When asked about what the ag. business perspective on how planning regulations impact the sector, Peter Jeffery said that “most ag. businesses do not view the ag. planning application process favorably, but most seem to comply with the ‘permitted uses’ protocol – where they are aware of it” (2017). Janet Horner made mention of a sentiment that seems to prevail across the entire sector: “It often seems as though Toronto-borne urban planning logic is being applied to rural areas where that logic is
not suitable” (2017). It is abundantly clear that ag. businesses require further convincing of the merits of the ‘permitted uses’ protocol.

A clear way forward may have been illuminated by one of the Farm Organization key informants. Janet Horner of the GHFFA was asked in her interview about how this issue might be readily addressed. Mrs. Horner was quick to respond, “I wish I had a one-page document that I could just hand to farmers that I know that would explain what they need to do to get a planning application to pass” (2017). This is an integral finding in that it exemplifies that:

a) a short document would be very useful to a key organization in the ag sector;

b) the document needs to be accessible and perhaps designed from the perspective of the ag. business;

c) the final part of the section is of key importance: all the ag. business wants is to “know what they need to do to get a planning application to pass”. They don’t want or necessarily need to know in-depth information about the arduous process of application testing. They generally just need to know the bare minimum to get their application to pass. This would be of key importance to the development of the hypothetical short document tool.

Clarity on the definitions of ‘Permitted Uses’, and greater consistency on use-policy from municipality to municipality would streamline land use interactions with planners for farmers. This could represent a first step in the right direction towards bettering interactions between planners and ag. businesses.
Policy Makers

When asked about how ag. businesses perceive planners and planning related activity, Jocelyn Beatty, a planner for OMAFRA, put it eloquently:

people do not know much about the planning process and often only give it much thought when they are forced to interface with it. I think this is an important thing to remember. We need to actively work towards making it a positive experience and move towards mutual respect. I also think we need to be mindful to start at the basics every time – not launch into jargon or technical wording right away. Simply asking people where they are at and what specifically they need from you can go a long way.

(Beatty, 2017)

It is clear that policy makers such as OMAFRA and the MMAH are aware that planning-related activities are perceived this way by ag. businesses. Efforts are being made by the province to improve these relations, however the task is a tall one (Beatty, 2017).

Planners

According to Rick Reitmeier, “most farmers do not view the ag. application process kindly, but planners must work with within the framework provided to make the best decisions possible when it comes to applications” (2017). This viewpoint echoes what was discussed in
the ‘Planners’ section corresponding with research question number 2 regarding wait times: the planners don’t actually have control over what test criteria are used for applications, and therefore limited control over the influences that led to the formation of the barriers discussed here. It is important to point out though, that planners do have significance influence over relations with the ag. sector so it is important that they behave responsibly within that realm of control. Jocelyn Beatty put it neatly – “building (an agricultural) knowledge base, removing barriers, and strengthening the flow of information can be incrementally worked on” by planners, policy maker and farm organizations alike (2017).

Analysis

The KIIs revealed a great deal about how the different stakeholders view the issues, how the stakeholders interact with one another and they even revealed certain avenues that can be followed to move toward addressing the issues discussed above. In response to research question number one, two major findings were revealed:

- **municipalities within the GH are subject to different criteria than one another, making it difficult to create a document that consolidates all possible criteria by which ag. planning applications will be tested.**

- **municipalities vary the way they test applications against criteria from one municipality to the next – the order is not set.**

These findings are important because they tell us that the tool will be limited to only a generalized version of application testing since test criteria varies from one municipality to the next. By only ‘glazing over’ what occurs on the planners end of the process, the document can
avoid the issue posed by the major finding above: the generalized information will avoid being snagged by variance in testing procedure from one municipality to another.

In response to question number two one major key finding is relevant:

- **The next version of the PPS will see the extension of the ‘conformity exercise’ cycle from five to ten years, in order to provide municipalities with more time to bring their official plans into conformity**

This is of key importance to the development of a tool that will guide farmers through planning applications in that this represents relief on the horizon for municipalities finding themselves bogged down with conformity exercises rather than backlogs of planning applications to be tested. As this tool is implemented ag. businesses will be experiencing shorter wait-times as a result of this peripheral impact.

From research question number three come three major findings that will be important to the development of a tool that explains the ag. planning application process to ag. businesses:

a) a short document would be very useful to a key organization in the ag sector;

b) the document needs to be accessible and perhaps designed from the perspective of the ag. business;

c) the final part of the section is of key importance: all the ag. business wants is to “know what they need to do to get a planning application to pass”. They don’t want or necessarily need to know in-depth information about the arduous process.
of application testing. They generally just need to know the bare minimum to get
their application to pass. This would be of key importance to the development of
the hypothetical short document tool.

This means that a) there will be a platform ready for the distribution of such a document; b) the
document will be made for the convenience of ag. businesses, not necessarily for accuracy on
planning operations; and c) this ‘convenience’ will be dominantly geared toward helping ag.
businesses achieve passing applications.

The KII's have laid the foundations for developing this tool meant to guide farmers
through planning applications. Furthermore, they have presented the research team with the
information necessary to create a document that is:

- generalized enough that it can be used across the various municipalities of the GH;
- specific enough that the step-by-step information provided can be useful for ag.
businesses;
- a consolidation of the larger, more explanatory documents associated with ag. land
  use planning in Ontario;
- Accurate surrounding the ‘permitted uses’ protocol used across the province.

Because this document will only apply to lands that are zoned agricultural in the GH, the tool
will be called the “Want to Grow Your Agricultural Business?” tool.
The “Want to Grow Your Agricultural Business?” Tool

The key informant interviews revealed clear ‘commonalities’ in the way planners operate between the various municipalities across the GH, and even across Ontario. By identifying the above-listed commonalities, an avenue toward addressing at least some of the ‘low-hanging-fruit’ barriers revealed by the Best Practices research team. Key finding #1 from the Best Practices project revealed that no short documents exist for the use of ag. businesses across the GH. The interviews revealed that this is at least partly because planning departments at the various municipalities in the region operate differently from one another, and are subject to different policies from one another.

However, the interviews also revealed that each municipality generally tests planning applications in the same way. Depending on the application type - even if the criteria for testing varies - applications across Ontario are tested against: Official Plans, provincial policy, applicable provincial plans (Greenbelt, etc.), local by-laws, technical specifications (MDS, etc.), Environmental Impact Assessments, Conservation Authority consultation and sometimes public feedback. There is a great deal of variability in how each municipality tests each application type, but all municipalities follow the same general process for application testing:

a) a ‘pre-consult’ meeting with the developer;

b) the submission of an application is followed by testing of that application against the municipality-specific criteria (outlined in figure__),
c) some discussion and deliberation usually occurs between the municipality, the region (where applicable), and those consulted on the application (where applicable);

d) a decision is rendered on the application: either it is approved, it is sent back to the developer for changes, or it is disapproved.

(Caldwell, Morawetz, Reitmeier, Roberts, Williams, 2017)

Understanding this, an avenue towards addressing key finding #1 (using information revealed by answering research questions number one through three) has been made possible. Because application testing follows the same general pattern across Ontario, a short document that summarizes this pattern can be formulated. In order for this document to be useful to ag. businesses, step-by-step guidance on how they can navigate each component of this common pattern will need to be developed.

So, the following eight subsections describe the Growing Your Agricultural Business tool (‘the tool’), component by component. Side one is a step-by-step guide to the agricultural planning application process from the ag. business’ perspective. Side two contains more information for those ag. businesses looking to learn more about what goes into the application process. Each subsection describes the given component of the document, and describes how the component is meant to work. Information from KIlS has been used to develop each section of the tool, especially information obtained from interviews with the ‘Planners’.
Side One: Want to Build Your Agricultural Business?

On Side 1 (figure 1) of the tool the proponent is provided with step-by-step guidance through the agricultural application process. The proponent is also given a glimpse into the planning office as what is occurring in the planning office is summarized. Prescribed ag. business’ actions are described in green on the left, and planner actions are summated on the right in blue. It is important to note that what actually occurs on the planners’ end is much more complicated than what is outlined on the tool. However, simplifying what planners do has been deemed appropriate for the purposes of demonstrating the process to ag. businesses. After all, this document is meant to encourage farmers to follow protocol by demonstrating the ease with which protocol can be followed. It is not meant to demonstrate just how complicated a planner’s part in the application process is. A larger version of side one can be found in appendix 1.

(Figure 1: Side One of the Growing your Agricultural Business tool.)
**Step 1**

In most municipalities applicants who wish to develop on agriculturally-zoned land are encouraged to set a ‘pre-consultation’ meeting with the planning office. The applicant and planner discuss the project, the general details of what can and cannot be applied for, which applications are required, and other applicable information. So, *Step 1* is on the left of the side of the first page and is titled *Develop Your Plan (seen in figure 2)*. This component is meant to prepare the proponent for their pre-consultation meeting with their planner. The proponent is advised to create “a brief description of their project that demonstrates their use and what they want to do” (Morawetz, 2017). This should include:

- type of project;
- 911 numbers & roll number
- address
- an estimation of the potential impact on neighbours and the environment
- type of use
- size of use

Finally, the proponent is instructed to make an appointment with their planning office.

On the right of *Step 1* is the *Planner Guidance, Assessment and Feedback* section demonstrating what proponent companies can expect from the planner during the pre-consult
meeting. Proponents can expect planners to explain policies, regulations, guidelines and other information that applies to their project. Examples of the topics that proponents can expect planners to tell them more about are listed. During this step, the planner will usually tell proponents what type(s) of applications will need to be submitted.

Figure 2: Step 1 and corresponding planner action.

**Step 2 & 3**

During step two (seen in figure 3) the applicant is expected to refine their plan according to the directions provided to them during the pre-consult meeting. For step two applicants may need to adjust the size or scope of their project, they may be told their proposed use is unsuitable or they may be told that their proposed use is not location suitable. For example, the original location of the proposed development may have been found unsuitable and therefore the applicant will need to move the development to an appropriate area. After their plans are
refined to specifications, the applicant will submit their application(s) to their planning office with the applicable fees.

On the right of step two and three there is information about what applications may require. Listed are the different types of applications and test criteria that go into application. These are listed so that should the applicant be so inclined, they can easily look up what each type of application entails. The types of applications and test criteria listed are:

- Official Plan Amendment
- Zoning Bylaw Amendment
- Lot Line Adjustment
- Severance
- Site Plan Approval
- Conservation Authority Consultation
- Minor Variance
- Other Studies

Finally, to the right of the list is a message in red reading: “This may take time”. The intention of this message requires no clarification – knowing ahead of time that this process takes time may help the applicant prepare for the wait, or at least provide warning to them.

Figure 3: Step 2, 3 and corresponding planner action. Approvals may take time.
Step 4

During Step 4 (figure 4) the applicant will either receive approval or denial based on how the testing of the application went. If the application is approved, the applicant will proceed as directed in the letter of approval (ie. They will proceed to build). If the applicant is denied they may discuss whether the project can be salvaged with their planner or choose to scrap the project. A hyperlink to more information on the subject is provided below.

Figure 4: Step 4 and how to proceed if your application is denied.
Side Two: What Goes into an Assessment (Additional Information)

On Side Two (figure 5) the proponent company is provided with additional information about the agricultural planning application process. The page is titled ‘What goes into an assessment’ and subtitled ‘What a planning office will do’. In the first section the document tells applicants how to proceed if they only need a building permit. The second section describes ‘What goes into an application’, or in other words, what applications may be tested against.

In the third and final section, more of ‘What a planner will be able to tell you’ is explained. A larger version of side one can be found in appendix 2.

(Figure 5: What goes into an assessment is discussed on Side Two.)

Building Permit Box

According to Wayne Caldwell, “the vast majority of applicants will only require a building permit, which is a much ‘rubber-stamp’ process compared to other applications” (2017). This being the case, this document would not be complete without a brief section on building permits. The section notes that “(most of the time your building your building project will only require a building permit)”
, and that this is something that the planner will be able to tell the proponent. An example of a scenario wherein usually nothing more than building permit will be required. A hyperlink to more information on the subject is provided below this information. The building permit box can be seen in Figure 6.

![Building Permit Box](image)

Figure 6: The ‘Just Need A Permit?’ box tells applicants who have been instructed that they only require a permit, what to do.

**Application Testing Criteria Box**

This box demonstrates to the applicant the various policies, legislation, consultations and codes that their application may be tested against. Depending on the type of application, each application will be tested against different criteria. For example, whereas new development requires MDS I formulae to calculate appropriate distance separation between itself and “existing livestock barns, manure storages and/or anaerobic digesters”, “new, expanding or remodeled livestock barns, manure storages and/or anaerobic digesters” require MDS II formulae to calculate the minimum distance separation between it and “existing or
approved development” (OMAFRA, 2016c). A list of these testing criteria can be found in figure 7.

The list of criteria is followed by a sentence explaining to the proponent that a planner can tell them “what regulations, and planning actions (their) application is subject to during the approvals and building process, as well as after the approval process”. This list itself is meant to provide the applicant with ‘search terms’, should they choose to research the criteria themselves. It also provides the applicant with the appropriate terminology required to discuss what criteria their project may be tested against with their planner. The sentence following the list encourages the applicant to discuss this further with their planner. A hyperlink to more information on the subject is provided below for the convenience of the applicant.

Figure 7: Application testing criteria and hyperlink to relevant information.
How Planners Can Help Box

The final box on the second page of the tool describes to the applicant how their planner will be able to assist them through the agricultural planning application process (figure 8). As described by the planners when asked about research question two, planners can tell applicants a lot during the pre-consult and other phases of the application process. The applicant may be told:

- whether their use is zone appropriate;
- general information about the planning process;
- whether a simple building permit will be required or whether a more complex application will be needed;
- whether the proponent needs to make changes prior to submission of their application;
- the proponent will be told about things to avoid in relation to their use.

A hyperlink to more information on the subject is provided below the list of what planners can tell applicants about the process.

![What a planner/building official will be able to tell you:](image)

Figure 8: The ‘what a planner can tell you’ box.
Conclusion

This major research project has explored the state of land-use planning related policy and regulation in Ontario, with particular focus on the GH. The project reflected on an earlier study, *Best Practices in Land Use Planning for Food and Farming Businesses in the Golden Horseshoe*, to demonstrate the need for a short document that guides ag. businesses through planning applications. The project employed KIIs with representatives from three distinct stakeholder groups: Farm Organizations, Planners and Policy Makers, to answer three research questions derived of the *Best Practices* project. Answers to these questions laid the foundations for the development of a document that could be used to guide ag. businesses through planning applications.

When it was perceived that this research would lead to such a document, the author arranged to present it at the annual OPPI conference in October. The intention was to deliberately expose the research to critical and experienced eyes. The document has been overwhelmingly well received. The author was asked to present at the Municipal Agricultural Economic Development and Planning forum (hosted by Halton region) in October. The tool was presented again for the same purposes and was again the subject of much praise. Finally, the tool was presented at the GHFFA’s quarterly working group meeting in November. The response was generally positives, and planners present made minor adjustments to the tool. Moving forward the author has been asked to present this research at a meeting on ag.
planning processes in the Township of Kawartha Lakes. The author will also be presenting this research as part of a webinar on ag. planning in Ontario hosted by the MMAH in February 2018.

The tool discussed in the final sections of this paper satisfies the parameters that were developed as a result of answering the research questions. The tool is:

- generalized enough that it can be used across the various municipalities of the GH;
- specific enough that the step-by-step information provided can be useful for ag. businesses;
- a consolidation of the larger, more explanatory documents associated with ag. land use planning in Ontario;
- Accurate surrounding the ‘permitted uses’ protocol used across the province.

The tool will be made available on the GHFFA’s webpage in early January.

**Resources**


Horner, J. (2017) Key Informant Interview with Author on September 11, 2017

Jeffery, P. (2017) Key Informant Interview with Author on August 21, 2017

Kalnina, A. (2017) Key Informant Interview with Author on December 5, 2017

Kelly, B. (2017) Key Informant Interview with Author on August 17, 2017


Morawetz, M. (2017) Key Informant Interview with Author on August 16, 2017


Ontario Federation of Agriculture (2016b) *Checklist to Support Agricultural Growth in your Municipality*. Retrieved from:


Reitmeier, R. (2017) Key Informant Interview with author on September 1, 2017


Roberts, B. (2017) Key Informant Interview with Author on August 16, 2017

Turvey, J. (2017) Key Informant Interview with Author on August 14, 2017


Williams, M. (2017) Key Informant Interview with Author on August 15, 2017
Appendix 1: 95% size of side one of the tool.
Appendix 2: 95% size of side one of the tool.
Grade 83%

Comments:

1) You need to put pagination on your document.

2) Page 39 the list of types of typical applications is good. Based on your understanding and that of the people you interviewed can you provide an opinion as to which of these types are most difficult and time consuming.

2) A couple of case studies and commentaries in a text box would be instructive for the reader.