

## 8.0 POLICY AND ADVOCACY

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### 8.1 Findings

This Community Food Assessment is taking place at an opportune time for local food system support and food policy development in Canada. The *Local Food Act* serves to support the development of strong and sustainable local food systems in Ontario.<sup>166</sup> Additionally, Prime Minister Justin Trudeau has recently stated that he expects the Minister of Agriculture and Agri-Food to develop a national food policy.<sup>167</sup>

The following section of the Community Food Assessment serves to identify agricultural and food related policies within Middlesex-London. The objectives of this section are:

- To provide an overview of the food policies that currently exist in the local area;
- To document policies which support the development of a local, sustainable food system;
- To identify local food policies that have attained council support (i.e. policy wins); and
- To give an overview of grassroots advocacy efforts in the area related to food security and food sovereignty.

This section begins by examining policy at the County level, followed by each of the municipalities, and the City of London. Advocacy and/or collaborative efforts within the Middlesex-London food system are then highlighted.

#### ***County of Middlesex***

The importance of the agricultural sector and the County's support for it, are clearly articulated in Middlesex County's Official Plan. The plan states,

Agriculture is the cornerstone of the County's economy and culture. A significant portion of the County's land base is farmed and the diversity of agricultural products is amongst the best in Ontario. Urbanization has however, created conflicts in the agricultural area and continues to encroach on prime agricultural land. The policies of this Plan are intended to affirm that agriculture is a predominant activity in the County. Non-agricultural activities will be closely scrutinized and directed to Settlement Areas unless the activity is agriculturally related and a location in proximity to agriculture is necessary (2.3.9).

The County has land designated for agricultural use and any non-agriculture related development in these areas is restricted to the following conditions: the non-agriculture land use must not “detract or adversely affect present and/or future agricultural operations; interfere with the viability of farm units; or detract from the character of the agricultural

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<sup>166</sup> Government of Ontario, *Local Food Act, 2013*, S.O 2013 Chapter 7, 2013, Web, at <http://www.ontario.ca/laws/statute/13l07>).

<sup>167</sup> Rt. Hon. Justin Trudeau, *Minister of Agriculture and Agri-Food Mandate Letter*, November 2015, Web, at <http://pm.gc.ca/eng/minister-agriculture-and-agri-food-mandate-letter>).

community. This policy helps to preserve farmland and protect the local food system (2.2.2.2).<sup>168</sup> Further attempts to preserve farmland show through the restriction on aggregate extraction (2.2.3.2).<sup>169</sup> This is an important policy as it seeks to preserve the agriculture land so that it may continue to be utilized for agriculture purposes after extraction.

The County of Middlesex's Official Plan does not appear to support small-scale farming of less than 40 hectares. In turn, this prevents new farmers from learning how to farm on incubator farms, which would use small parcels of land to help train and mentor them over several years. General policies related to designated agricultural areas state: "In the Agricultural Areas, farm parcels shall remain sufficiently large to ensure flexibility and the economic viability of the farm operation. The creation of parcels of land for agriculture of less than 40 hectares shall generally not be permitted."<sup>170</sup> Generally this agricultural policy means that farms in the area must be 100 acres or more, which excludes farms smaller in size. At one time, small, family farms were the norm and the generally accepted size of these farms was smaller than 100 acres.

### ***Southwest Middlesex***

The Official Plan of Southwest Middlesex dictates policies on agriculture land use. General planning directions highlight the preservation of prime agricultural land, recognize the importance of agriculture to the local economy, and protect prime agricultural areas and operations (2.2.2; 2.2.3; 2.2.4).<sup>171</sup>

More specifically the policies related to agriculture designation "are intended to ensure the continuation of farming as the predominant use of the rural area of Southwest Middlesex."<sup>172</sup> Furthermore, land use for purposes other than farming will only be permitted under certain and limited circumstances. If allowed, the land use will be strictly controlled in scale, location, and type so that it does not interfere with farming or result in the loss of prime agricultural land.<sup>173</sup>

Agriculture areas primary use of land should be "for the cultivation of land, the raising of livestock and the growing of trees. A full range of agricultural activity shall be permitted including cash crops, livestock, market gardening, tobacco farming, specialty crops, aquaculture, horticulture and forestry, and buildings and structures associated therewith (5.4.1.1. Primary Uses)."<sup>174</sup> Land designated agriculture may be used for other purposes "such other uses primarily serve or are otherwise directly related to, or complement, agricultural activity. Uses which would not be detrimental, offensive or conflict with agricultural activities

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<sup>168</sup> County of Middlesex Official Plan, 2006, Print, at p.2-7, 2.8.

<sup>169</sup> Aggregate extraction refers to the action of taking out something, usually requiring effort or force. Aggregates typically refer to sand, gravel, clay and bedrock (Source: County of Middlesex Official Plan, 2006, Print, at p.2-9).

<sup>170</sup> County of Middlesex Official Plan, 2006, Print, at p.3-5.

<sup>171</sup> Southwest Middlesex Official Plan, 2011, Print, at p.2-1.

<sup>172</sup> Southwest Middlesex Official Plan, 2011, Print, at p. 5-2.

<sup>173</sup> Southwest Middlesex Official Plan, 2011, Print, at p. 5-2, 5-3.

<sup>174</sup> Southwest Middlesex Official Plan, 2011, Print, at p. 5-2, 5-3.

and which are necessarily located in the rural area due to their nature or their potential to create conflicts if located within settlement areas may also be permitted (5.4.1.2).<sup>175</sup> These policies illustrate that Southwest Middlesex supports a wide range of agricultural production methods.

The Official Plan states that areas designated “Agricultural” shall be protected for farming (5.4.1.3).<sup>176</sup> The agricultural economy is supported through a right-to-farm (5.4.1.4),<sup>177</sup> secondary farm occupations (5.4.1.9.),<sup>178</sup> and second dwelling and seasonal living quarters on farms (5.4.1.10).<sup>179</sup>

Zoning By-Laws as they pertain to the food system, dictate that mobile food outlets (self-propelled motor vehicle or a unit towed by a motor vehicle from which food and refreshments are made available to the general public for a fee) are permitted in highway commercial and core commercial zones (2.113).<sup>180</sup>

### ***Strathroy-Caradoc***

Included in the agricultural goals and objectives in Strathroy-Caradoc’s Official Plan is to preserve and protect agricultural land, maintain and promote agriculture as a major component of the economy and to protect agricultural operations from the unwarranted intrusion of non-agricultural activities (2.2.1).<sup>181</sup> In rural areas, agriculture is to be maintained as the predominant use of land and non-agriculture use is located to settlement areas whenever feasible and possible. The municipality allows a full range of agricultural activity including general farming, livestock farming, cash crop farming, market gardening, tobacco farming, speciality crops, horticulture and forestry (5.4.1.1).<sup>182</sup>

Policies lend support to larger scale farms as the splitting of prime agriculture land into smaller parcels is generally discouraged (5.4.1.6).<sup>183</sup> When considering this idea, Middlesex County’s Official Plan restrictions on splitting land should be regarded by Strathroy-Caradoc (which prevents farm parcels of less than 40 hectares).

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<sup>175</sup> Southwest Middlesex Official Plan, 2011, Print, at p.5-3.

<sup>176</sup> Southwest Middlesex Official Plan, 2011, Print, at p. 5-3.

<sup>177</sup> Southwest Middlesex Official Plan, 2011, Print, at p. 5-3.

<sup>178</sup> Southwest Middlesex Official Plan, 2011, Print, at p.5-6.

<sup>179</sup> Southwest Middlesex Official Plan, 2011, Print, at p.5-6.

<sup>180</sup> Southwest Middlesex Planning Section 3 through 10, No Date, Web, at

[http://www.southwestmiddlesex.ca/Public/Page/Files/59\\_SWM%20ZBL%202011\\_065%20aFULL%20BY-LAW\\_Part1\\_Sections%203%20to%2010.pdf](http://www.southwestmiddlesex.ca/Public/Page/Files/59_SWM%20ZBL%202011_065%20aFULL%20BY-LAW_Part1_Sections%203%20to%2010.pdf).

<sup>181</sup> Strathroy-Caradoc Official Plan, 2008, Print, at p.2-2.

<sup>182</sup> Strathroy-Caradoc Official Plan, 2008, Print, at p.5-2.

<sup>183</sup> Strathroy-Caradoc Official Plan, 2008, Print, at p.5-3.

Strathroy-Caradoc's Official Plan supports the use of farm stands and market gardens by residents as the only buildings and structures permitted in the front yard are for agriculture use (4.2.1.c)<sup>184</sup> (4.25).<sup>185</sup>

Strathroy-Caradoc regulates the size of greenhouses, in addition to the size of farms. Greenhouses must be on a lot of at least two hectares, cover 40% of the area, not have a gross floor area greater than 500m<sup>2</sup> (unless a site plan agreement has been entered into with the Municipality), and no manure, compost or equipment can be stored within 30 metres of the road allowance, watercourse, or a residential use on an adjacent lot (4.11).<sup>186</sup>

For farmers who do not have extra help on their farms, it is difficult to operate a fruit and vegetable stand in Strathroy-Caradoc as by-laws state that not more than one person, who is not a resident of the farm lot, can operate the fruit and vegetable stand (Section 18.4(1)).<sup>187</sup> If you are a larger scale farmer, and have people working the farm for you, you could operate the farm stand with one other person - a much more feasible model than having one person man the stand.

### **Thames Centre**

The Official Plan supports the agricultural sector by protecting agricultural land, recognizing the value the industry has for the municipality, and sustaining agricultural operations (3.1.1; 3.1.2).<sup>188</sup>

This municipality appears to support small-scale farming in that existing undersized farm parcels are encouraged to remain in production (3.1.2 (3)).<sup>189</sup> Thames Centre also supports sustainable agricultural practices as one of the goals of the agricultural and green space policies is to ensure a suitable agricultural land base is preserved in order for those engaged in agricultural operations to continue to do so (3.1.2(4)).<sup>190</sup>

Thames Centre is making steps towards a sustainable food system by creating policies that aim to preserve the soil in the area. Soil preservation occurs in three ways: all development has to incorporate measures to reduce or mitigate soil erosion and conserve topsoil, peat extraction cannot occur on any land within the "green-space system," and no peat or topsoil extraction can occur within the "agricultural" designation without an Environmental Impact Study being completed (2.21).<sup>191</sup>

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<sup>184</sup> Municipality of Strathroy-Caradoc, *Zoning By-Law No. 43-08*, 2008.

<sup>185</sup> Municipality of Strathroy-Caradoc, *Zoning By-Law No. 43-08*, 2008.

<sup>186</sup> Municipality of Strathroy-Caradoc, *Zoning By-Law No. 43-08*, 2008.

<sup>187</sup> Municipality of Strathroy-Caradoc, *Zoning By-Law No. 43-08*, 2008.

<sup>188</sup> Thames Centre Official Plan, 2004, Print, at p.42.

<sup>189</sup> Thames Centre Official Plan, 2004, Print, at p.42.

<sup>190</sup> Thames Centre Official Plan, 2004, Print, at p.42.

<sup>191</sup> Thames Centre Official Plan, 2004, Print, at p.29.

In the general provisions of the Comprehensive Zoning By-law, the establishment of a farm vacation business is permitted within a single detached dwelling, provided that the business operator lives in the dwelling used for this business, and specific requirements are met in regards to the size and number of guest rooms related to the business. This is positive for farmers in both general and restricted agriculture zones who are seeking to diversify their revenue stream by utilizing their existing asset. It allows them to promote their farm operation, direct market their agricultural production and any value-added products they make, as well as engage in agri-food tourism. Farm vacation businesses also present an opportunity for Middlesex-London residents and visitors to experience where their food comes from and who is responsible for producing it.

Source: Township of Adelaide Metcalfe, *Comprehensive Zoning By-law*, By-Law No. 34-2007, December 3, 2007.

### **Adelaide Metcalfe**

Adelaide Metcalfe's Official Plan (AMOP)<sup>192</sup> and Comprehensive Zoning By-law<sup>193</sup> regulate the use of land in the municipality. The AMOP serves to establish policies that both preserve and protect agricultural land while limiting non-agricultural uses of this land. According to the AMOP, "the primary use of land within the areas designated agricultural areas...shall be farming which includes the use of lands, buildings and structures for the growing of crops, including nursery and horticulture crops, raising of livestock, poultry and other animals, aquaculture and agroforestry."<sup>194</sup> There are only a few special policy areas (s. 3.1.10) that allow for the use of agricultural land for non-agricultural purposes, including restaurants, convenience stores, motels, gas bars, and industrial activity.<sup>195</sup>

Under the AMOP's comprehensive planning policies, agriculture is not only recognized as the "major economic base of the municipality" but also as having the "potential to have negative effects on the natural environment."<sup>196</sup> For this reason, the township states that it "shall strongly encourage use of environmentally sound farm management practices."<sup>197</sup> However, it also states that it "will discourage the further fragmentation of existing farm parcels and will encourage efforts to consolidate smaller farm units into larger, more viable farm units."<sup>198</sup> The specific considerations related to this objective are detailed in the agricultural consent policies (s. 3.1.9). Considerations here include the agricultural capability of the land, the type of proposed agricultural activity, and the size of severed and retained parcels of land, to name a few.<sup>199</sup>

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<sup>192</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011.

<sup>193</sup> Township of Adelaide Metcalfe, *Comprehensive Zoning By-law*, By-Law No. 34-2007, December 3, 2007.

<sup>194</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011, Print, at p. 19.

<sup>195</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011, Print, at p. 22.

<sup>196</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011, Print, at p. 4.

<sup>197</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011, Print, at p. 4.

<sup>198</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011, Print, at p. 4.

<sup>199</sup> Township of Adelaide Metcalfe, *Official Plan*, Consolidated Version, April 26, 2011, Print, at p. 21.

The AMOP is supported by the Comprehensive Zoning By-law, which divides land into specific zones with permitted uses. There are four zones that relate to the use of land for agricultural purposes: general agriculture zones; restricted agriculture zones; limited agriculture zones; and institutional zones. The general agriculture and restricted agriculture zones share many of the same conditions; most notably, the minimum lot size in both zones is 40 hectares. In addition to agriculture, both of these zones also permit the use of land for the following purposes: accessory dwelling unit within a single detached dwelling; accessory use; bed and breakfast establishment; conservation; equestrian training facility; farm vacation business; forestry; and home business.<sup>200</sup> The only use of land that is permitted in a general agriculture zone but not in a restricted agriculture zone is a farm business, which is “limited to welding, seed dealing, small machinery repair, cabinet making, furniture making or repair, carpentry, the sale and service of equestrian equipment and a tradesperson or contractor’s establishment.”<sup>201</sup>

Limited agriculture zones; however, differ quite significantly from the other zones when it comes to the minimum size of plots and the permitted uses of land. Lots in this zone can be as small as 1000 sq/m and, in addition to agriculture, the following uses are permitted: accessory use; bed and breakfast establishment; dog kennel; forestry use; home business; and single detached dwelling.<sup>202</sup> Finally, institutional zones, which have minimum lot areas of 0.4 hectares, permit the use of the following: assembly hall; cemetery; day care facility; government office; home for the aged; outdoor storage; place of worship; public works and utilities; residential care facility; as well as public and private schools.<sup>203</sup> It is important to note that agriculture is not one of the permitted uses of land in this zone.

### ***Lucan Biddulph***

According to the first page of the Lucan Biddulph Official Plan (LBOP): “*Agriculture is arguably the economic mainstay and defining characteristic of the Township of Lucan Biddulph.*”<sup>204</sup> As such, one of the main assumptions on which the LBOP is based is as follows:

Agriculture will continue to be the predominant land use and the economic mainstay of the Township given stable or improved market conditions for agricultural products and a strong commitment to a land use planning approach which is supportive of farming and which strictly controls urbanization of the rural area.<sup>205</sup>

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<sup>200</sup> Township of Adelaide Metcalfe, *Comprehensive Zoning By-law*, By-Law No. 34-2007, December 3, 2007, Print, at p. 6-1.

<sup>201</sup> Township of Adelaide Metcalfe, *Comprehensive Zoning By-law*, By-Law No. 34-2007, December 3, 2007, Print, at pp. 5-3.

<sup>202</sup> Township of Adelaide Metcalfe, *Comprehensive Zoning By-law*, By-Law No. 34-2007, December 3, 2007, Print, at pp. 8-1.

<sup>203</sup> Township of Adelaide Metcalfe, *Comprehensive Zoning By-law*, By-Law No. 34-2007, December 3, 2007, Print, at pp. 20-1.

<sup>204</sup> Township of Lucan Biddulph, *Official Plan*, Consolidated Version, January 31, 2014, Print, at p. 1.

<sup>205</sup> Township of Lucan Biddulph, *Official Plan*, Consolidated Version, January 31, 2014, Print, at p. 3.

“While the ‘backbone’ of the farming community continues to be the small farming operation, large corporation farms are becoming more prevalent and appear to be the growing trend.... *Cash crops and livestock farming are the dominant farming types, however, there is a growing trend towards both large cash crop operations and large intensive livestock operations. The Municipality is increasingly concerned about the impact of these large livestock operations and particularly the generation of large volumes of liquid manure.*

(Source: Township of Lucan Biddulph, *Official Plan*, Consolidated Version, January 31, 2014, at pp. 30-32).

This assumption underpins a number of the LBOP’s overall goals and objectives, especially as they relate to preserving and protecting both agricultural land and rural areas from being developed for non-agricultural purposes (s. 1.2 a, c, d, e, and f).<sup>206</sup> For example, the LBOP seeks to direct population growth towards both Lucan and Granton, so that rural area population growth is limited (s. 3.1). This will allow for the primary use of land in rural areas to continue to be for agricultural use—including “livestock farming, cash crop farming, specialty farming, mixed farming, horticulture, forestry and general farming”—and agriculturally-related commercial and industrial uses (s. 3.2.1.7).<sup>207</sup> Secondary uses of farmland are also permitted, including for industrial, recreational, and home-based business; however, these uses must not disrupt or impact upon the use of land for agricultural purposes (s. 3.2.1.1).<sup>208</sup>

Lucan Biddulph’s Comprehensive Zoning By-law supports the LBOP and local food system activity in a number of ways.<sup>209</sup> Under the general use regulations for general agricultural zones (s. 5.1) permitted uses for land include agriculture. In addition, in the exceptions (s. 5.3), defined areas include farmgate markets, which permit the land to be used for a market garden.<sup>210</sup> Special agricultural zones permit similar uses of land as general agricultural zones, including for agriculture, but on a much smaller plot size (8,000 sq/m) in comparison to the minimum lot area in general agricultural zones (40 hectares).<sup>211</sup> Worth noting for future residential zones (s.13) is that, in addition to the use of land for home occupation, the general use regulations permit as an exception (s. 13.3) the use of existing residential land for market gardens.<sup>212</sup>

Also important to food system activity are commercial zones, both central (s. 14) and highway commercial zones (s.15). Central commercial zones permit the use of land for convenience

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<sup>206</sup> Township of Lucan Biddulph, *Official Plan*, Consolidated Version, January 31, 2014, Print, at pp. 4-5.

<sup>207</sup> Township of Lucan Biddulph, *Official Plan*, Consolidated Version, January 31, 2014, Print, at p. 33.

<sup>208</sup> Township of Lucan Biddulph, *Official Plan*, Consolidated Version, January 31, 2014, Print, at p. 33.

<sup>209</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print.

<sup>210</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 35.

<sup>211</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 38.

<sup>212</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 67.

stores, institutional use, retail stores, and restaurants.<sup>213</sup> Highway commercial zones permit a wider range of uses that relate to food activity, including: drive-in or take-out restaurants; general retail stores; market gardens; mobile food outlets; and restaurants.<sup>214</sup>

Other important zones covered by the by-law include farm commercial zones (s. 16) and farm industrial zones (s. 18). In addition to being used by a farm-building contractor for farm equipment sales and service, farm commercial zones permit the use of land for market gardens, nurseries, and garden centres.<sup>215</sup> Significantly, farm industrial zones (s. 18) permit uses of land for activities that are directly related to the start and middle of the food supply chain: abattoir; egg grading station; farm building contractor; farm chemical, fertilizer and pesticide sales; farm fuel sales; farm produce; storage; and feed mill.<sup>216</sup> The other use that farm industrial zones permit that is important for food system activity is found in the special use regulations, and this is a retail store (s. 18.2).

Finally, it is worth noting that the by-law permits the use of land for agriculture in extractive industrial zones (s. 19) but when it comes to open space zones (s. 21), which include public parks, agriculture is not listed as a permitted use. This zoning clause is significant because it limits residents of Lucan Biddulph from using their public parks and other open spaces for such things as community gardens, food forests, and other public agricultural activity.

“The Municipality of Middlesex Centre has a tremendous agricultural resource, and a long-standing agricultural heritage that helps to define our community identity. The agricultural land base represents one of our most significant economic and community assets, with the majority of the Municipality considered Prime Agricultural land. It is a key priority of the Municipality that agricultural areas be protected for agricultural and resource uses, and that the agricultural economy be enhanced within the Municipality. The continued viability of agricultural resource areas, the agricultural industry, and agricultural communities will be protected by the Municipality, in part through the avoidance of land use conflicts and the prevention of non- agricultural urban uses outside of the settlement areas”

(Source: Official Plan of the Municipality of Middlesex Centre, June 24, 2014 at pp. 17.)

### ***Middlesex Centre***

Agriculture is a grounding feature of the Municipality of Middlesex Centre’s Official Plan (MCOP). The MCOP has as part of its general agricultural goals to keep agricultural as the primary land use, preserve and protect the area’s agricultural heritage and farmland from non-

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<sup>213</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 69.

<sup>214</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 73.

<sup>215</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 78.

<sup>216</sup> Township of Lucan Biddulph, *Comprehensive Zoning By-law*, Consolidated Version, By-Law No. 100-2003, January 2015, Print, at p. 85.

agricultural development, and encourage good farm management and stewardship.<sup>217</sup> The general agricultural policies support these goals by prohibiting the following: use of agricultural land for non-agricultural urban purposes; new estate residential lots beyond settlement areas; and the fragmentation of existing farmland into smaller parcels. Conversely, it encourages the expansion of farm parcels through the consolidation of farm plots.<sup>218</sup>

The primary use of agricultural land in the MCOP is for agriculture; however, and importantly, there are additional commercial and industrial agricultural uses permitted, including “added-value” agriculturally related uses.<sup>219</sup> These added-value uses are defined as “activities within the farm parcel that relate to onsite or communal farming practices, such as processing, storing and packaging of farm produce. Such communal uses should not exceed a scale necessary to meet the needs of the surrounding agricultural community.”<sup>220</sup>

In addition to the general policy protections of agricultural land from being developed for non-agricultural purposes, additional contingencies are established around the recreational development of agricultural land. However, it is important to note that, as long as there are no adverse effects on surrounding agricultural areas and the use is on land that is deemed to be poor for agriculture, farmers markets are a permitted parks and recreational use.<sup>221</sup>

Another area of the MCOP that relates directly to local food system activity is its tourism policies (s. 9.2.3). These policies seek to encourage economic development of the agricultural sector through non-obtrusive tourism growth opportunities, including agriculturally related and ecologically related tourism.<sup>222</sup>

The Middlesex Centre Zoning By-law divides and regulates the use of land in the municipality into 21 zones.<sup>223</sup> Of importance to note for local food system activity are the following zones: agricultural zone; restricted agricultural zone; agricultural no-residences zone; farm industrial zone; parks and recreation zone; and open space zones. The permitted uses of land in these zones detail and condition activities that relate to all aspects of the food supply chain; notably, farm inputs, processing; storage; and retail.

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<sup>217</sup> Municipality of Middlesex Centre, Official Plan of the Municipality of Middlesex Centre, June 24, 2014, Print, at p. 17.

<sup>218</sup> Municipality of Middlesex Centre, Official Plan of the Municipality of Middlesex Centre, June 24, 2014, Print, at p. 17.

<sup>219</sup> Municipality of Middlesex Centre, Official Plan of the Municipality of Middlesex Centre, June 24, 2014, Print, at p. 18.

<sup>220</sup> Municipality of Middlesex Centre, Official Plan of the Municipality of Middlesex Centre, June 24, 2014, Print, at p. 115.

<sup>221</sup> Municipality of Middlesex Centre, Official Plan of the Municipality of Middlesex Centre, June 24, 2014, Print, at p. 68.

<sup>222</sup> Municipality of Middlesex Centre, Official Plan of the Municipality of Middlesex Centre, June 24, 2014 at pp. 72-73.

<sup>223</sup> Municipality of Middlesex Centre, *Comprehensive Zoning By-law*, Number 2005-005, May 4, 2005.

## **North Middlesex**

Three pillars ground the mission statement of North Middlesex's Official Plan (NMOP): enhancing agriculture and economic development; enriching community services; and conserving the natural environment.<sup>224</sup> The NMOP's economic development policies reinforce the first pillar by serving to protect agriculture while developing the industry through diversifying the economy (s. 4.1).<sup>225</sup> One example of how this is done is through tourism related economic development and the encouragement of "agriculturally related and rural resource-related tourism opportunities..."<sup>226</sup> Another way is through the promotion of home occupations and on-farm secondary businesses, such as bed and breakfast establishments.<sup>227</sup>

Further to these opportunities, the NMOP protects rural lands and agricultural activity through its settlement area policies (s. 5.0) and general housing policies (s. 5.2.5). These policies limit the expansion of hamlet settlements and prevent "the introduction of new non-farm residential development outside of the Settlement Areas."<sup>228</sup> When it comes to land uses related to food system activity within settlement areas, central area lands (s. 5.3) and institutional area lands (s. 5.7) are worth noting. On lands designated as central areas, general retail and restaurants are permitted under the primary commercial uses of the land.<sup>229</sup> While agriculture is not listed as a permitted use on lands designated as institutional areas, permitted uses do include major parks and other public uses.<sup>230</sup>

The most important of North Middlesex's designated areas for the local food system are rural areas (s. 6.1), including both urban reserve areas (s.6.3) and agricultural areas (s. 6.4), and open space areas (s. 7.4). According to the general policies for rural areas, non-agricultural urban uses, new non-farm residential lots, and the fragmentation of farm parcels, are strongly discouraged if not prohibited, while "the expansion of farm parcels through lot assembly is encouraged wherever possible."<sup>231</sup> Subject to approval, which takes into consideration both physical and environmental constraints, lands designated as open spaces (s. 7.4) are permitted to be used for agricultural purposes.<sup>232</sup> This is a positive sign for the establishment of community gardens.

Like the other municipalities in Middlesex County, the abovementioned areas and their permitted land uses are detailed in and regulated by a municipal zoning by-law: the North Middlesex Zoning By-Law.<sup>233</sup> This by-law divides the area into various zones, including those

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<sup>224</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 3-1.

<sup>225</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 4-1.

<sup>226</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at s. 4.1.2

<sup>227</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at s. 4.1.3.

<sup>228</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 5-10.

<sup>229</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 5-12.

<sup>230</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 5-20.

<sup>231</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 6-1.

<sup>232</sup> Municipality of North Middlesex, *Official Plan*, Office Consolidation, June 2014, Print, at pp. 7-8.

<sup>233</sup> Municipality of North Middlesex, *North Middlesex Zoning By-Law No.35 of 2004*, Office Consolidation, June 2015.

areas described above, and details all of the permitted uses of land in these zones. One permitted use of land that stands out as a local food system opportunity is the sale of farm produce from a road side stand in both restricted agricultural and urban reserve zones, so long as the stand is seasonal and does not operate year-round.<sup>234</sup>

### ***City of London***

There are a combination of policies and supportive initiatives/programs within the City of London that currently exist and therefore demonstrate positive developments, which can be leveraged and built upon to achieve a more local, sustainable and healthy food system.

An analysis follows that covers the policies and supportive initiatives/programs that resulted from an environmental scan conducted as part of a community food assessment in Middlesex-London.

### **Community Improvement Policies**

Community Improvement policies are designed to provide the opportunity to plan for and coordinate physical improvements to areas of the City that tend to be older and in need of repair. These policies are a planning mechanism that can facilitate access to a variety of provincial cost sharing programs as well as encourage private investment activity for the improvement of these areas.<sup>235</sup>

In chapter 14 of the City of London's Official Plan it states that the objectives for the use of community improvement policies: "Support the implementation of measures that will assist in achieving sustainable development and sustainable living."<sup>236</sup> This objective suggests that the intended use of the Community Improvement Policies is open to improvements that further sustainable development and living in a particular area. Urban agriculture may in fact fit well within the intended use of these provisions and substantially increase sustainable living within a designated Community Improvement Area. What are the eligibility criteria for an area to be designated a Community Improvement area?

The Council of the City of London qualifies areas from which specific "Community Improvement Project Areas" may be designated in the Official Plan. Council may designate, through passing or amending a by-law, "Community Improvement Project Areas" from the areas shown on Figure 14-1 - Areas Eligible for Community Improvement. These areas are eligible for "community improvement" as defined in the Planning Act. Additional eligible areas may be added by amendment to the Plan. This means to add community improvement areas Council has to amend the Plan.

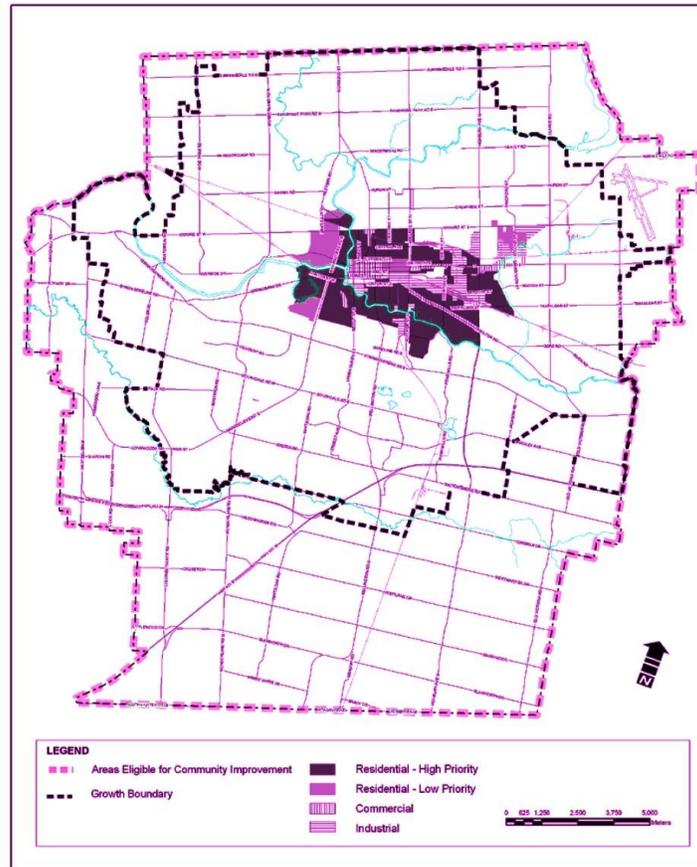
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<sup>234</sup> Municipality of North Middlesex, *North Middlesex Zoning By-Law No.35 of 2004*, Office Consolidation, June 2015, Print, at pp. 79 and 83.

<sup>235</sup> City of London, *Official Plan*, 2008, Print, at s. 14.

<sup>236</sup> City of London, *Official Plan*, 2008, Print, at s. 14.1.

## AREAS ELIGIBLE FOR COMMUNITY IMPROVEMENT



## Residential

The selection of areas, which are eligible for residential community improvement is based on the following criteria:

- A significant proportion of residential properties in need of rehabilitation;
- Average household income below City average;
- Deficiency or inadequate development of parkland or social and recreational facilities;
- Need for improvement to municipal services including storm sewers, sanitary sewers, sidewalks, curbs and gutters, streetlights, and water mains;
- A stable pattern of land use; and eligibility for designation for assistance

Two categories of eligible residential areas have been defined as follows:

- High Priority Areas, which are currently designated for assistance under a neighbourhood improvement program, or which meet all of the other criteria.
- Low Priority Areas, which are deficient only in municipal services or park and recreational facilities, but not both; or which have indications of instability in the existing pattern of land use.

Food insecurity may potentially be addressed in residential areas that are already designated as High Priority and eligible for designation for assistance. These areas will be lower in income and in disrepair, with inadequate parkland or social and recreational facilities. In these cases, City parkland may be used for a community garden or urban orchard to increase sustainable living of the residents in that community improvement area. Many other possibilities exist to develop infrastructure for a more sustainable food system in community improvement areas, such as, greenhouses, community food centres, urban rooftop farms, community gardens, local food depots or hubs, and others. Attracting private sector investment may be the key for these areas as it may greatly offset the cost for redevelopment from the City's perspective. Researching successful and financially viable models for improving food security in urban areas would furnish policy makers with ready-made, proven solutions for adapting and implementing in the area.

### **Commercial and Industrial**

The selection of areas, which are eligible for commercial or industrial community improvement, is based on the following criteria:

- Land use problems associated with incompatible uses or an under-utilization of land, which detracts from the functioning and viability of the area; and
- A demonstrated interest in community improvement by the private firms within an area.

In summary, a community improvement area can be any commercial or industrial area where land is under-utilized or where a food system project could contribute to the functioning and viability of the area or where an interest in community improvement can be demonstrated from a private firm or firms. This suggests that if a proposed area and project contributes to the viability of local businesses and they express their support, then it may qualify for this designation.

### **Relevant Land Use Policies**

Chapter 9 of the City of London's Official Plan outlines provisions that relate to Agriculture, Rural Settlement and Urban Reserve Land Use Designations. The introduction states a clear intention to protect the agricultural land resources that are within the City of London.

The objectives and policies of this Chapter are intended to protect the agricultural land resource and maintain the viability of farming within these areas so that agriculture continues to make a significant contribution to London's economy. The policies recognize the need for a long term commitment to agriculture and are intended to prohibit the fragmentation of land holdings, minimize the loss of prime agricultural land

to non-farm development, and prohibit the introduction of land uses that are incompatible with, or may potentially constrain farm operations.<sup>237</sup>

The permitted uses in areas designated as “Agriculture” are included in Section 9.2 (added by OPA No. 88 - OMB Order No. 2314 - approved 99/12/23) and continue throughout the subsections within 9.2.

In section 9.2.1. of the Official Plan, both primary and secondary permitted uses are described as follows:

**Primary Permitted Uses:** Within areas designated "Agriculture" on Schedule "A", the primary permitted use of land shall be for the cultivation of land and the raising of livestock. A full range of farming types shall be permitted including, but not limited to, general farming, livestock farming, cash crop farming, market gardening, specialty crops, nurseries, forestry, aquaculture and agricultural research.

A farm residence is permitted as is a home occupation and a secondary farm occupation in accordance with the provisions of policies 9.2.5. and 9.2.6. of this Plan.9.2.2.

**Secondary Permitted Uses:** Secondary permitted uses in the Agriculture designation include secondary farm dwellings in accordance with the provisions of policy 9.2.7; agriculturally-related commercial and industrial uses, subject to the provisions of policy 9.2.8.; public open space and conservation uses subject to the provisions of policy 9.2.12.; public utilities and storm water management facilities subject to the provisions of Chapter 17. Oil and gas extraction may be permitted in accordance with the provisions of Chapter 15 of this Plan.<sup>238</sup>

The fact that market gardening and specialty crops are included in the excerpt above means that smaller scale farming operations are permitted within the areas designated as agriculture.

Section 9.2.8. of the Official Plan covers Agriculturally-Related Commercial and Industrial Uses which can support a farm operation. This permits a farmer to have a small lot within close proximity to the farm where product can be handled, washed, stored, packaged or even sold direct to the consumer. Section 9.2.8 states:

Small-scale agriculturally-related commercial and industrial uses that are supportive of the farm operation and that require a location in close proximity to a farm operation are permitted in areas designated "Agriculture". Such uses include grain drying, handling and storage facilities, and farm market uses. Legally existing agriculturally-related commercial and industrial uses will be recognized in the Zoning By-law. Impacts from

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<sup>237</sup> City of London, *Official Plan*, 2008, Print, at s. 9.0.

<sup>238</sup> City of London, *Official Plan*, 2008, Print at s. 9.2.1.

any new or expanding non-agricultural uses on surrounding agricultural operations and lands are to be mitigated to the extent feasible.<sup>239</sup>

Also, a positive opportunity exists within the official plan for new agriculturally-related commercial and industrial uses. These uses would require an amendment to the Zoning By-law and must comply with three conditions, namely, size, need and location. See the excerpt from section 9.2.8 of the Official Plan below:

New agriculturally-related commercial and industrial uses may be permitted by an amendment to the Zoning By-law to apply the appropriate agricultural commercial or agricultural industrial zone, subject to the following policies (Section 9.2.8. amended by OPA):

**Size**

i) The amount of land devoted to the activity includes only the minimum necessary to support the activity and its servicing requirements.

**Need**

ii) It can be demonstrated that the use is supportive of the farm operation and requires a location in close proximity to the farm operation to function successfully.  
(Clause ii) amended by OPA 438 Dec. 17/09)

**Location**

iii) The location of the facility should not impose any operating constraints or result in a reduction of the efficiency of existing farms in the vicinity. Agriculturally-related commercial and industrial uses should be directed to sites having soil capability, drainage, topographic, site size or configuration limitations for agriculture.<sup>240</sup>

Toward the end of Chapter 4 of the City of London's Official Plan covering Downtown and Commercial Land Use Designations, in section 4.11 drive-through facilities are described as permitted uses with some restrictions. In cases, when a new drive-through facility is proposed the Zoning By-law would need to be amended. Consideration of the matters identified in Section 4.11 (Drive Through Facilities).

Drive-through facilities are normally associated with restaurants, financial institutions, convenience stores, automobile services stations and a limited range of retail uses, and are normally located in auto-oriented commercial designations. Drive-through facilities are permitted in commercial land uses designations other than Downtown and Business District Commercial through a zoning by-law amendment and/or site plan application, subject to the application of urban design guidelines. Urban design guidelines will address such issues as built form and streetscape, pedestrian circulation, vehicular

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<sup>239</sup> City of London, *Official Plan*, 2008, Print, at s. 9.2.8.

<sup>240</sup> City of London, *Official Plan*, 2008, Print, at s. 9.2.8.

access and parking, landscaping and signage. Particular attending shall be given to site, which abut residential uses. (OPA 444 passed 2008/07/22).<sup>241</sup>

Within the policy covering Downtown and Commercial Land Use Designations a drive-through food hub or local food depot, or some other local food drive-through may be permitted with an amendment to the Zoning By-law.

### Open Space Land Use

Open space land use is described in section 8A.2.2. in the City of London's Official Plan. Permitted uses are detailed for open space in the following passage:

Public open space uses including district, city-wide, and regional parks; and private open space uses such as cemeteries and private golf courses are permitted in the Open Space designation. Agriculture; woodlot management; horticulture; conservation; essential public utilities and municipal services; and recreational and community facilities; may also be permitted. Zoning on individual sites may not allow for the full range of permitted uses.<sup>242</sup>

The uses for public and private open space indicated in the passage above, clearly allow for the cultivation of food, recreational and community facilities. This means there is a possibility that community gardens and/or local community food centres could be permitted on open public or open private spaces.

Extremely relevant to the possibility of using open public space for growing food is a motion City Council passed on August 25, 2015, in which the Community and Protective Services Committee proposed that Civic Administration be directed to proceed with stakeholder consultation on the feasibility of an urban agriculture policy which outlines:

- i) An inventory of parcels of City-owned land that are potential locations for urban farming;
- ii) The role the City of London could play with regard to urban farming on public lands;
- iii) A clear definition of "urban agriculture"; and,
- iv) A review of the current license policies and by-laws to ensure that the City plays a role that does not hinder the various aspects of urban agriculture such as land preparation, food growth, food production and food sales.<sup>243</sup>

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<sup>241</sup> City of London, *Official Plan*, 2008 Print, at s. 4.11.

<sup>242</sup> City of London, *Official Plan*, 2008, Print, at s. 8A 2.2.

<sup>243</sup> City of London, "9<sup>th</sup> Report of the Community and Protective Services Committee," August 25, 2015, Web at <http://sire.london.ca/mtgviewer.aspx?meetid=971&doctype=MINUTES>.

## Bonus Zoning

Bonus Zoning is detailed in section 19.4.4 of the Official Plan and relates to increases in height restrictions and density limits applicable to developments that are proposed. The principle of the bonus zoning by-law is that these height and density restrictions may be extended when there are no negative cost/benefit implications and there is a general public benefit. This means that rooftop gardens or rooftop greenhouse structures may be permitted within and under the bonus zoning. Section 19.4.4 states:

### Principle

1. The facilities, services or matters that would be provided in consideration of a height or density bonus should be reasonable, in terms of their cost/benefit implications, for both the City and the developer and must result in a benefit to the general public and/or an enhancement of the design or amenities of a development to the extent that a greater density or height is warranted. Also, the height and density bonuses received should not result in a scale of development that is incompatible with adjacent uses or exceeds the capacity of available municipal services.<sup>244</sup>

The need for public benefit is also expressed in the stated objectives of the bonus zoning policy and explains that in cases when the public benefit cannot be obtained through normal development.

### Objectives

ii) Bonus Zoning is provided to encourage development features which result in a public benefit which cannot be obtained through the normal development process. Bonus zoning will be used to support the City's **urban design principles**, as contained in Chapter 11 and other policies of the Plan, and may include one or more of the following objectives:

- a) To support the provision of the development of affordable housing as provided for by 12.2.2.
- b) To support the provision of common open space that is functional for active or passive recreational use;
- c) To support the provision of underground parking;
- d) To encourage aesthetically attractive residential developments through the enhanced provision of landscaped open space;
- e) To support the provision of, and improved access to, public open space, supplementary to any parkland dedication requirements;
- f) To support the provision of employment-related day care facilities;

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<sup>244</sup> City of London, *Official Plan*, Print, at s. 19.4.4.

- g) To support the preservation of structures and/or districts identified as being of cultural heritage value or interest by the City of London, in consideration for their designation under the Ontario Heritage Act;  
(Clause (g) amended by Ministry Mod. #63 Dec. 17/09)
- h) To support **innovative and environmentally sensitive development** which incorporates notable design features, promotes energy conservation, waste and water recycling and use of public transit;
- i) To support the preservation of natural areas and/or features; and
- j) To support the provision of design features that provide for universal accessibility in new construction and/or redevelopment.  
(Clauses (i) and (j) added by OPA 438 Dec. 17/09)<sup>245</sup>

Recent additions to the bonus zoning objectives may in fact be intended or at least open for application to rooftop gardens and other urban agriculture projects, as “innovative and environmentally sensitive development”. Also, clause b) and e) mention public or common open space which is open to agricultural use. Many urban agriculture projects may be positioned within clause h) by incorporating water reuse and recycling and energy conservation. An example of this is that rooftop gardens help to insulate and shade rooftops, and often incorporate storm water drainage measures that help slow roof run-off and recycle rainwater for plant irrigation. These benefits have been documented extensively in Germany, and as early as 2002 in Canada by the National Research Council of Canada.<sup>246</sup>

## Agriculture

Section 9.2.6. of the Official Plan, gives a detailed description of secondary farm occupations, and permits farmers to improve the viability of their farm by taking on a secondary farm occupation, such as, the processing or retailing of goods produced on the farm.

### Secondary Farm Occupations

Secondary farm occupations are to be carried on as part of the farm unit as a means of providing supplemental income to support the farm family and the viability of the primary farming operation. A secondary farm occupation conducted with a building other than a dwelling may be permitted provided it remains secondary to the agricultural use on the farm. Secondary farm occupations are differentiated from "home occupations" by the larger size and scale of the activity. A secondary farm occupation may be permitted by an amendment to the Zoning By-law subject to the following criteria:

### Permitted Occupations

- i) A secondary farm occupation may include the processing or retailing of goods produced on the farm, a welding or fabricating shop, a vehicle repair establishment, a contractor or

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<sup>245</sup> City of London, *Official Plan*, 2008, Print, at s. 19.4.4.

<sup>246</sup> Liu, K.K.Y., “Energy Efficiency and Environmental Benefits of Rooftop Gardens, Construction Canada,” 44: 2, March 2002, Print, at p. 17 and pp. 20-23.

trade shop, a personal service establishment, a craftsperson's shop, a day care facility, a seasonal roadside produce stand, a bed and breakfast or farm vacation establishment, a small business office, or any other occupation which is directly related to agriculture.

#### **Number of Activities**

ii) One permanent secondary farm occupation will be permitted per farm lot in addition to seasonal or intermittent uses permitted in conjunction with the primary farm operation.

#### **Size**

iii) Existing buildings or structures may be used for a secondary farm occupation. New buildings or structures, or additions to buildings or structures may be constructed for the purposes of the secondary farm occupation as part of the farm cluster but shall be of comparatively small scale relative to the farm operation, as established through the Zoning By-law.

#### **Employees**

iv) A secondary farm occupation shall be operated directly by the resident farmer and immediate family members and a maximum of two additional employees.

#### **Location**

v) A secondary farm occupation shall be conducted in conjunction with the existing farm cluster including any new buildings or facilities constructed for the secondary use. Access to secondary farm occupations shall be restricted to an existing driveway and no new driveway will be permitted.

#### **Servicing**

vi) Adequate on-site sewage and water systems can be provided to accommodate the secondary farm occupation.<sup>247</sup>

### **Draft London Official Plan**

At the time of writing this report, the City of London is drafting a new Official Plan. Currently, the plan is in its second draft and is out for public review and feedback. There are many components of the draft that support the development of a stronger, more sustainable local food system.

The draft Official Plan focuses on developing a culturally rich and diverse city. In relation to the local food system, London will become a regional cultural centre by providing abundant employment and learning opportunities in food and agriculture, among others.<sup>248</sup> Furthermore, London aims to be a green and healthy city. One of the means by which this will be achieved is through using their asset of being located in the centre of agriculture in Southwestern Ontario.

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<sup>247</sup> City of London, *Official Plan*, Print, at s. 9.2.6.

<sup>248</sup> City of London. *Official Plan Second Draft*, Print, at p. 141.

By leveraging this asset, London will grow a strong food system that allows its residents to access healthy food (in part by identifying and eliminating food deserts).<sup>249</sup>

The draft contains a section that focuses on the local food system. London's food system is defined as the:

...Prime agricultural land in and around our city, as well as the significant agri-food industry that exists in London that processes, packages, and transports our food to the world. Our food system involves backyard and community gardens, local businesses, and restaurants that sell and serve food, and farmers markets that bring residents, food businesses, and local growers together.<sup>250</sup>

Within London's food system, the draft Official Plan seeks to achieve a number of goals, and these include:

- a) A sustainable food system that contributes to the economics, ecological, and social well-being of our city and region.
- b) Local food production and access to local, regional, national and international agricultural trade markets.
- c) A strengthened local food system infrastructure.
- d) Ready access to high-quality retail grocery stores, farmers' markets, and other food sources which provide affordable, safe, healthy, culturally diverse, and local foods.
- e) Alternative ways that Londoners grow. Process and sell food within the city.
- f) Opportunities for urban food production on private and public lands.
- g) Community economic development through the growth, processing, packaging, distribution, marketing, sale, and serving of food.
- h) Mechanisms that support and promote food waste recovery and re-use systems that retain biological nutrients for local farmers or other food producers.<sup>251</sup>

The city will work towards accomplishing these objectives through comprehensive food system planning, community benefit, public/private partnerships and investment by the city.<sup>252</sup> Initiatives within each of these areas include, but are not limited to, preparing and implementing a community garden strategy, promoting the local production of food with other tourism and recreational activity, supporting before-school programs that provide nutritional meals to children in the morning, in identified food deserts encouraging farmers markets, grocery stores, and community gardens, and supporting small business and entrepreneurs involved in the production of artisanal food products and other goods using locally-sourced materials.<sup>253</sup>

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<sup>249</sup> City of London. *Official Plan Second Draft*, Print, at p. 171.

<sup>250</sup> City of London. *Official Plan Second Draft*, Print, at p. 163.

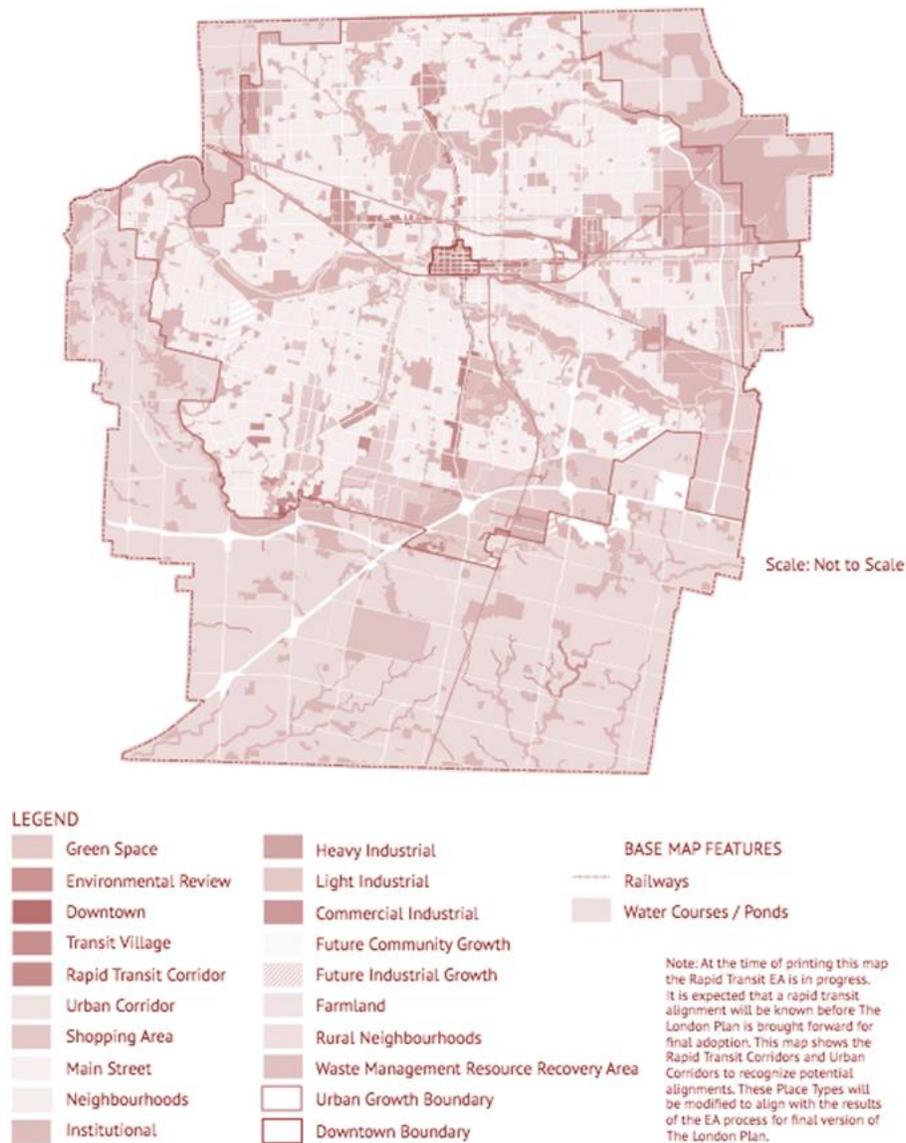
<sup>251</sup> City of London. *Official Plan Second Draft*, Print, at p. 164.

<sup>252</sup> City of London. *Official Plan Second Draft*, Print, at p. 163.

<sup>253</sup> City of London. *Official Plan Second Draft*, Print, at p. 165-166.

The Forest City section of the plan serves to preserve all of the trees and associated vegetation within London’s boundary. The plan recognizes the Urban Forest as integral to London’s identity and overall prosperity and subsequently, land use policies will serve to protect this resource. Bonus Zoning policies will focus on increasing building height and densities when appropriate in order to support the sale and long-term preservation of the Urban Forest.

**Figure 53: City of London by Place Type (Source: London’s Official Plan Second Draft, 2015)**



One of the draft Official Plan’s priorities is to “protect the agricultural land resource and maintain the viability of farming, and recognize the need for a long-term commitment to sustain farmland within these areas so that it may continue to make a significant contribution

to London's economy."<sup>254</sup> Rural London, which consists of the place types farmland, rural neighbourhood, waste management resource recovery area, green space, and environmental review, has its own unique function and distinct identity from Urban London; however, they are both integral to one another, and supportive and supported by the other.<sup>255</sup> The vision for Farmland Place Type includes:

Farmland in London will continue to be an area of intense production and vibrant economic activity. The landscape will be characterized by viable agricultural fields which support general farming, livestock farming, cash crop farming, market gardening, specialty crops, nurseries, forestry, aquaculture, and agricultural research. Agricultural production on farmland will include multiple scales, styles and systems of food, fuel, and fibre production. Farmers and the farming community, agricultural land, a healthy and vibrant rural economy, and rural quality of life will all be protected for the long-term. Agricultural uses, agricultural-related commercial and industrial uses and on-farm diversified uses will be permitted. Farms will be permitted to sell local produce and house full-time farm labour on-site to maintain the farm's vitality.<sup>256</sup>

The Farmland Place Type's role within the city is to promote sustainable farm practices that encourage the protection of aquatic and wildlife habitat, woodlands, and surface and groundwater resources in a manner where such practices do not impose undue limitation on the farming community.

## Supportive Initiatives/Programs

### Community Garden Policy

Community Gardens are a forward thinking initiative that supports the development of a local and sustainable food system while addressing food insecurity in the community. Interested citizens can become community gardeners and apply for a plot of land, which they can cultivate and use to produce foods of their choice. The City of London has been supportive of these initiatives for many years. The City of London, local businesses and churches have donated the land. The City of London Parks and Recreation provides services including, rototilling and at some sites, water delivery.

The City of London Community Gardens 2013 Guidelines sets out some standardized policies, procedures and accountabilities to support London's Community Gardens Program.<sup>257</sup> The policies, procedures and accountabilities are broken into the following categories and subcategories:

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<sup>254</sup> City of London. *Official Plan Second Draft*, Print, at p. 311.

<sup>255</sup> City of London. *Official Plan Second Draft*, Print, at p. 311.

<sup>256</sup> City of London. *Official Plan Second Draft*, Print, at p. 313.

<sup>257</sup> Guidelines for community gardens have been developed by the City of London and the London Community Resource Centre and are available at the following link: <http://lcrcc.on.ca/wp/wp-content/uploads/2013/03/Londons-Community-Gardens-2013-Guidelines.pdf>.

1. Existing Community Gardens
  - Code of conduct and conditions of use
  - Consequences of failing to comply
  - Responsibilities of community gardeners
  - Responsibilities of the City of London
  - Responsibilities of the coordinating agency
  - Submitting an application for a plot
2. New Community Gardens
  - Submitting an application for a new community garden
  - Constructing a new community garden
3. Composting In Community Gardens.<sup>258</sup>

Further support for community gardens is entrenched into the *London Community Gardens Program Strategic Plan 2015-2019*, which City Council endorsed in September 2015.<sup>259</sup>

### Farmers Market

Middlesex-London Local Food Guide was funded by the Middlesex Federation of Agriculture and features places to get local food including: 1) markets and mills; 2) fruits and vegetables, 3) honey, maple syrup and preserves, and 4) meats and fish. Among other helpful information, the Local Food Guide helps individuals understand when local products are in season, the benefits of buying local and tips for buying local. This tool helps individuals seeking fresh healthy local foods to explore and source products within their area (see Food Purchasing and Consumption for an illustration of the Local Food Guide).

### Local Rooftop Gardens

The City of London's City Hall building has a rooftop garden and the University of Western Ontario has a rooftop garden as well. These gardens are not being used for agricultural purposes but are surely signs that greening urban spaces has become acceptable.

### Food Security Initiatives (Funding)

Within the City of London's endorsed Social Policy Framework, food security is identified as a priority area along with income security, social inclusion and safe, affordable housing. In the framework itself the role of the municipality in Food Security is described as follows:

While the City of London does not directly deliver programs related to food security, the municipality has a significant history of investing municipal funds in a number of local

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<sup>258</sup> London Community Resource Centre, *London Community Gardens 2013 Guidelines*, 2013, Print, at p.7-12.

<sup>259</sup> City of London, *London Community Gardens Program Strategic Plan 2015-2019*, 2015, Print.

food security initiatives. For example, 100% municipal funds available through the MAPAG Fund have been invested in community gardens and collective kitchens for a number of years.

In addition, the City of London has been an active participant in the Hunger Relief Advisory Committee (HRAC), which was formed to address the need for and delivery of "emergency" food and coordination of related services.

Further details regarding each of these policy issues and the role of the City of London in responding to them will be outlined in a subsequent City of London policy paper on food security.<sup>260</sup>

MAPAG Fund stands for the Mayor's Anti-Poverty Action Group Fund, which contributed approximately \$1.5 million dollars of funding to anti-poverty and many food security initiatives between the years 1999 and 2003.

In addition to the City of London's Social Policy Framework, the Mayor's Advisory Panel on Poverty just released "London for All: A Roadmap to End Poverty" (April 2016). In recognizing that "it's time to act," the report sets out comprehensive recommendations towards implementing lasting change. With respect to igniting food security change in the community, the report suggests that supporting the development of a Middlesex-London Food Policy Council is an important step in the first 12 months because "each recommendation by itself may make a small difference, but a coordinated, collective approach to implementing them can have dramatic impacts."<sup>261</sup>

### London Community Resource Centre

The London Community Resource Centre (LCRC) has been an integral part of the City of London for more than 30 years. Through the facilitation of multiple community-based programs, the LCRC actively addresses the issue of food security that affects a broad scope of city residents.

The LCRC is a volunteer-driven, non-profit, charitable organization that depends on the support of the community, including local businesses and community partners, in order to continue and succeed in the delivery of food-security programs. They are also one of four founding members of FoodNet Ontario, a pan-provincial network of organizations working towards creating local sustainable food systems and achieving community food security.

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"People should be able to grow whatever food they want all over their front yard. It's FOOD for goodness sake."

- Survey Respondent

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<sup>260</sup> London Community Resource Centre, *City of London Social Policy Framework*, 2006, Print, at pp. 20-21.

<sup>261</sup> Mayor's Advisory Panel on Poverty, *London for All: A Roadmap to End Poverty*, March 2016, Print at 23.

## Food Charter (not Policy)

Through the leadership of London's Child and Youth Network, a group of experts, professionals, and advocates came together in fall 2009 to discuss the issues Londoners face related to food security. This conversation began the development of a Food Charter. It is important to note that London's Food Charter is the only one that has been developed in Middlesex-London.

The Child and Youth Network (CYN) is comprised of over 130 local organizations working together to improve outcomes for children, youth and families. With the vision of "happy, healthy children and youth today; caring, creative, responsible adults tomorrow" the CYN's work is focused on four priority areas:

- Ending poverty
- Increasing healthy eating and healthy physical activity
- Making literacy a way of life
- Creating a family-centred service system

## Tourism Strategies

The County of Middlesex, Tourism Middlesex, is Middlesex County's Destination Marketing Organization that represents Middlesex on a regional level regarding tourism development initiatives. It focuses on the development of rural and agricultural tourism opportunity for the eight municipalities in Middlesex County.<sup>262</sup>

Visit Middlesex, a division of Middlesex County's Economic Development department, is responsible for tourism development and promotion within the County. Their mission is to generate meaningful employment, support economic growth, and build up Middlesex County's exceptional quality of life.<sup>263</sup> Visit Middlesex has an agri-tourism strategy that focuses on connecting visitors to farms and markets through agri-trail guides. The guides connect visitors to local food (fruits, vegetables, meats, preserves, breads and beverages) and other forms of entertainment (corn mazes, zip lining, and wagon/sleigh/train rides).

Taste of Middlesex is an annual event where restaurants, gourmet food vendors, and beverage distributors come together to provide all-you-can-eat culinary delights for as many as 1,000 attendees. In 2015, Taste of Middlesex was in its 18<sup>th</sup> year and more than 50 restaurants and eateries participated.

Tourism London suggests things to do for visitors to the city, including places to eat, where to stay, and current events. They also market London as a destination of choice for sporting events through the sport tourism initiative.

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<sup>262</sup> Tourism Middlesex, *County of Middlesex Budget Committee*, 2015, Web, at

[https://www.middlesex.ca/council/2015/march/10/budget2015/Tourism\\_middlesex.pdf](https://www.middlesex.ca/council/2015/march/10/budget2015/Tourism_middlesex.pdf).

<sup>263</sup> Visit Middlesex County, "About," No Date, Web, at <https://www.visitmiddlesex.ca/about>.

## Advocacy Efforts and Collaborations in Middlesex-London

There are a number of food advocacy organizations and collaboratives that are working towards a more sustainable local food system for Middlesex-London. The table below provides the names of these organizations/collaboratives, what work they are engaged in, and what geographical area this work targets. It should be noted that this is not an exhaustive list, and it is likely that there are additional groups involved in this work that are not in the table.

**“London needs an Urban Agriculture Master Plan!!!!!!”**  
**- Survey Respondent**

**Table 39: Collaboratives Involved in Food System Work and Food Advocacy Organizations (Source: Primary Research, August-December 2015)**

Who	What	Where		
		Middlesex-London	London	Middlesex County
Agri-business London Chamber of Commerce	The committee develops education and awareness programs that support the region’s vast agri-business sector (in rural Ontario). The committee also supports and enhances agricultural economic development activity through designated agencies and organizations by use of Chamber communications, networking opportunities, advocacy efforts, and promotion.	✓		
Child & Youth Network	The network serves to end poverty, make literacy a way of life, increase healthy eating and healthy physical activity, and create a family centered service system.		✓	
Community Gardens London	Community Gardens London celebrates the shared and community gardens of London and area, and the potential of urban agriculture. The focus is to support and advocate for food producing gardens and their role in individual and urban food security, our good health and environmental health.		✓	
Food Not Lawns	Food Not Lawns was founded in 1999 by a group of Food Not Bombs activists in Eugene, Oregon. In 2006, a co-founder of the group, Heather Jo Flores, published her book, <i>Food Not Lawns, How to Turn your Yard into a Garden and Your Neighborhood into a Community</i> . Currently there are over 50 chapters worldwide who, as gardeners, work together to grow and share food, seeds, skills and resources.		✓	
Glencoe Agricultural Society	The Glencoe Agricultural Society holds various community events, including an annual fair, related to the food system throughout the year.	✓		
Growing Chefs!	Growing Chefs! serves to provide an avenue for chefs and growers to get more involved in the community and to support food education; to provide children with the confidence, knowledge and enthusiasm to		✓	

Who	What	Where		
		Middlesex-London	London	Middlesex County
	grow and prepare good, healthy cuisine; and to support and encourage the development and growth of food education for children and families. Growing Chefs! advocates for food literacy efforts that target children and youth.			
Hamilton Road Area Food Security Initiative (through Crouch Neighbourhood Resource Centre)	The purpose of the Hamilton Road Area Food Security Initiative is to build the capacity of the neighbourhood to develop local and sustainable food systems. This will be accomplished through the form of Neighbourhood Food Coalition meetings, Food Families projects, and a Neighbourhood Food Hub. The Neighbourhood Food Coalition involves a diverse group of stakeholders working collaboratively with the neighbourhood while sharing knowledge, information, and resources. Food Families is a cluster of differing food programs and activities that aim to enhance food security of the families living in this neighbourhood. The Neighbourhood Food Hub is a physical place in the neighbourhood that will offer a centralized access point to a wide range of food related programs, services, and resources available to community members.		✓	
Hunger Relief Advisory Committee	This committee was formed to address the need for and delivery of "emergency" food and coordination of related services in London.		✓	
London Community Resource Centre	The centre supports the local food system through largely urban agricultural projects including Sprouts Children's Garden Program, community gardens and Grow Cook Learn workshops.		✓	
London Food Bank	The London Food Bank engages in advocacy efforts through ensuring that support and information are constantly available to anyone who needs it and works with many others groups towards a solution to poverty in Canada.		✓	
London Gets Local	The aim is to create an interactive directory expanding access to organic, non GMO, locally-sourced and natural products while keeping shopping dollars within the local community. The groups works to connect a non-biased and non-judgemental community sharing common values; provide information regarding what is in season, products available, specials, community events and workshops; educate on how to live a healthy life and feed your family the best foods on a reasonable budget; inform people where to obtain these products while reducing carbon foot print and keeping your shopping dollars close to home.	✓		
London InterCommunity	The centre provides inclusive and equitable health and		✓	

Who	What	Where		
		Middlesex-London	London	Middlesex County
Health Centre	social services to those who experience barriers to care, and fosters the active participation of individuals and the communities they serve. The centre contributes to food literacy efforts through offering cooking classes to interested groups. Advocacy is one of the Health Centre's values and firmly believes that for a situation to change for their clients for the better, the centre must be involved in advocating for social policy to change.			
London Training Centre	The London Training Centre supports the local food system through their Local Food Skills program where participants gain real skills and work with real food in a state of the art commercial kitchen. Moreover, the centre has 25 years of food skills training, advocacy for careers in foodservice and a commitment to a local, sustainable food system.	✓		
Mayor's Advisory Panel on Poverty	The responsibility of this collaborative, consisting of six individuals, is to develop a set of action-oriented recommendations on how London can address poverty more effectively as a community. The panel has five goals it hopes to achieve including: Developing a shared understanding of how to address poverty more effectively in London; Mapping efforts currently underway to address poverty in London; Identifying gaps and areas requiring significant action; Engaging local stakeholders in dialogue on gaps and approaches to address poverty; and Developing a set of recommendations to better coordinate our collective efforts to address issues related to poverty more effectively throughout London and the areas requiring significant action.		✓	
Middlesex-London Health Unit	Through the Harvest Bucks program, MLHU works with community organizations to distribute Harvest Bucks to people in need so that they can better affordable healthy, local food from farmers' markets. Currently, MLHU partners with five local farmers' markets for this program.	✓		
Middlesex Federation of Agriculture	This Federation works on a local level to represent the voice of the farmers (1,800 members) in Ontario Agriculture. The MFA is pro-active and responsive to local issues that directly impact farmers in Middlesex County. The MFA acts as a sounding board for municipal issues and bylaws and facilitates education through providing producer and public information and offering scholarship opportunities for people interested in agriculture.			✓
Middlesex London <i>in motion</i>	This organization encourages initiatives and advocates for a culture of healthy lifestyles. A recent advocacy effort includes increasing access to affordable healthy	✓		

Who	What	Where		
		Middlesex-London	London	Middlesex County
	food within Middlesex-London.			
North Dorchester Agricultural Society	The mission of NDAS is the preservation of the past; promotion of the present and the education on the future of agriculture, horticulture and rural and domestic economy. The Society holds and promotes an agricultural fair each year to serve as its primary medium to achieve this mission.	✓		
ReForest London	ReForest London is a non-profit organization dedicated to partnering with the community to enhance environmental and human health in the Forest City, through the benefits of trees. The group works to empower community groups, businesses, and individuals to plant and care for trees; Improve London's environmental health through planting trees and shrubs in natural areas, parks, yards and along streets; and educate Londoners about the importance of trees and how to plant and care for them.		✓	
London Strengthening Neighbourhoods Strategy	The London Strengthening Neighbourhoods Strategy is resident driven and supported by the City of London. Through the implementation of the strategy, a series of tools and programs have been developed to empower resident groups called NeighbourGood London. The strategy continues to evolve focusing on increasing neighbourhood level decision-making and activities.		✓	

## 8.2 Gaps in Knowledge

The list of organizations involved in food advocacy and collaboratives engaged in food system work provided in Table 39 is not an exhaustive list. The table was populated through desk research and consultation with key informants and community members; however, it is possible that not all organizations and collaboratives have been mentioned.

The perceptions and willingness of current, local council members on proposing progressive agri-food policies is not well documented; however, indications of a willingness to support urban agriculture within the City of London are encouraging. A local, healthy and sustainable food system survey for local councillors could be highly beneficial. It would be focused on gauging their willingness to support progressive agri-food policies and could identify areas where more immediate and longer-term results may be achieved.

### 8.3 Strengths and Assets

The Middlesex-London food system has many assets within policy and advocacy that can be used to make a stronger, more sustainable food system. Within social and political assets, the two assets are the London Food Charter and Middlesex County’s Official Plan’s core objective to protect the agricultural community. The Middlesex County Official Plan helps to sustain agriculture practices in the long-term within the area, contributing to a stronger local food system.

The growing momentum to create a Food Policy Council for the local food system was noted as another social and political asset. Having a designated group of dedicated individuals creates an opportunity to advance policy, acquire funds and champion local initiatives, to support progressive changes in developing a sustainable food system for Middlesex-London.

Additional assets include London councillors who are supportive of urban agriculture, the food system section of London’s Official Plan that highlights the importance of the food system to the community, as well as, the Child & Youth Network’s advocacy work on spreading awareness of food deserts within the area. The London Plan creates many opportunities to increase food literacy, sales amongst local growers, and the number of community gardens.

Table 40 lists all of the strengths and assets identified through the community food assessment process that pertain to this section of the report (please see 1.2 for Asset Legend).

**Table 40: Strengths and Assets within Policy and Advocacy**

POLICY AND ADVOCACY						
96. Non-for-profit and public interest/engagement in local food						
97. London Training Centre’s Sustainable Food Systems Report (Aug 2012) 60 recommendations on how to build a more sustainable food system						
98. Food Not Lawns						
99. London Food Charter						

## POLICY AND ADVOCACY

100. Middlesex County's Official Plan (protection of the agricultural community)
101. Move towards creating a Food Policy Council
102. New City Council (aware of the importance of the local food system and receptive to urban agriculture)
103. Child and Youth Network Ending Poverty Group
104. The London Plan
105. There is a drive for policy change and development (e.g. to implement local food hubs, to support small scale-production)
106. Child and Youth Network (Healthy Eating Initiative)

### 8.4 Areas to Cultivate

Within policy and advocacy, it was identified that small-scale farms are struggling as a lot of agricultural policy supports large-scale production. Many noted that planning policy is part of this problem, as minimum lot sizes are set in rural areas to keep farm plots large enough to allow for large-scale production. Minimum lot sizes were seen in many of the Official Plans noted above. Generally, the view implied by these policies is that small-scale agriculture is an unviable economic model. With a focus on large-scale agriculture production, it makes it very difficult for small-scale farmers to thrive and therefore, contribute to the local food system. Many people throughout the Community Food Assessment process explained that this problem is not unique to Middlesex-London, but is an identified issue across the nation. In response to the focus on large-scale agriculture production, many community food initiatives through the charitable sector or community-benefit sector are arising to preserve cultural traditions, agricultural practices and communities.

Additional problems identified related to policy and advocacy, include the lack of change to provincial regulations that make it difficult for local food businesses to thrive. Some felt that there was not enough advocacy work being done to challenge the Ontario government whereas, others believe there is a shortage of leaders who can mobilize people on food system issues. Many also noted a focus on food security, rather than food sovereignty, as impeding Middlesex-London from having a stronger more sustainable food system.

### 8.5 Opportunities for Change

In order to address some of the weaker areas within food policy and advocacy, key informants highlighted opportunities to increase production, challenge regulations and zoning strategies, encourage procurement of local food, and increase knowledge of farmers. More specifically, opportunities exist to farm smaller plots of land more intensively, including those areas in

urban locations. The need for advocacy efforts in regards to challenging policies that do not support a local food system was also noted (e.g. zoning strategies that increase urban sprawl onto agriculturally rich land). Many felt that within the non-profit sector there is an opportunity to increase the amount of advocacy work that is being done.

Increased advocacy efforts to challenge regulations that inhibit growth or prevent small scale businesses from competing in the marketplace was identified as another opportunity. Advocacy efforts could be strengthened by gathering evidence of small-scale operations within the food system that are viable and using these examples to leverage support from residents and politicians. Encouraging local food service businesses and institutions to purchase locally grown food would also help to support small-scale farmers and the local economy, as would a food hub that helps with local food distribution. Lastly, in regards to farmer education, a number of opportunities were identified to help support them. Opportunities to train farmers to scale up and manage their own growth, increasing the accessibility of farm education to residents, and assisting local farmers in marketing and retailing their product were identified.

With the large amount of land that encompasses Middlesex-London, there are numerous opportunities that can take advantage of this asset to strengthen the local food system. Land use policy has been used in the past to develop Netherland-style care farms where mental and physical health are promoted through giving people of all ages opportunity to spend time working on the land. Care farms provide supervised, structured programs of farming-related activities such as animal husbandry and crop and vegetable production.<sup>264</sup>

Given the small geographical proximity between Middlesex County and London, there may also be opportunities to develop an agrihood, where agriculture and neighbourhoods are combined. Within these communities, the community is located among or around a farm, and all community members work together on the farm to grow fresh produce for the community.

Participation in the Plant a Row, Grow a Row campaign could also be built into the policies of community gardens as a mandatory component of the initiative. Through this campaign homeowners and community gardeners are encouraged to plant an extra row (or more) of produce and donate the harvest to those in need in their community, either through food banks or other means.

Pertaining specifically to the City of London, policies can be used to support urban orchards and other urban agriculture projects that include green (environmentally friendly) infrastructure.

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<sup>264</sup> National Care Farming Institute, "What is Care Farming?" 2014, Web, at <http://www.ncfi.org.uk>.

# 8.0 POLICY AND ADVOCACY

“opportunities for urban food production on private and public lands”

“Agriculture is arguably the economic mainstay and defining characteristic of the Township of Lucan Biddulph”

“...farm parcels shall remain sufficiently large to ensure flexibility and the economic viability of the farm operation”

“the municipality has a significant history of investing municipal funds in a number of local food security initiatives”

“agriculture is the cornerstone of the County's economy and culture”

“policies recognize the need for a long term commitment to agriculture”

Our food system involves backyard and community gardens, local businesses, and restaurants that sell and serve food, and farmers markets that bring residents, food businesses, and local growers together”

“strongly encourage use of environmentally sound farm management practices”

“the expansion of farm parcels through lot assembly is encouraged wherever possible”