

Dear Members of the Grand Valley Town Council,

**Re: Strong Objection to the Proposed Zoning By-law Amendment for Lot 034541
Concession Road 8-9**

I am writing to formally express my opposition to the proposed zoning by-law amendment concerning Lot 034541 Concession Road 8-9. As a property owner and stakeholder in this community, I have serious concerns about the long-term impacts that this amendment will have on the environment, the agricultural economy, and the overall sustainability of the Grand Valley area. I urge the Council to carefully consider the adverse consequences this proposal will bring, not only to local farmers like my family but also to the broader community and future generations.

1. Protection of Agricultural Operations from Disturbances

The **Farming and Food Production Protection Act (FFPPA)** recognizes that agricultural activities, particularly intensive farming operations, may produce odors, noise, and dust. However, the Act protects farmers from legal actions or complaints regarding these disturbances, as long as they fall under "normal farm practices." The intention of this provision is to ensure that agricultural operations can continue without hindrance from non-agricultural land uses nearby.

Permitting residential development near existing farms would inevitably lead to conflicts. New residents unfamiliar with agricultural practices could file complaints about common farming activities, such as the operation of machinery, livestock odors, or pesticide application. While the FFPPA shields farmers from legal action, the introduction of residential development into agricultural zones creates a constant source of tension and legal pressure, potentially leading to restrictive by-laws that limit farming activities. Allowing such development would not only create ongoing conflict between residents and farmers but also place undue stress on farming operations that are essential to our community. As the Act states, "A farmer is not liable in nuisance to any person for a disturbance resulting from an agricultural operation carried on as a normal farm practice".

2. Preservation of Agricultural Land and Local Food Security

Agricultural land plays a crucial role in ensuring food security and addressing climate change by acting as carbon sinks, supporting biodiversity, and contributing to the local economy through sustainable food production. **Dufferin County's Official Plan** prioritizes the protection of agricultural lands, focusing on preventing their conversion to non-agricultural uses, including residential and commercial developments.

Agricultural land within Dufferin County is not only vital for local food production but also critical for climate resilience. Zoning amendments allowing non-agricultural development threaten the County's ability to maintain food security and mitigate climate impacts. Paving over prime farmland or fragmenting it with subdivisions compromises its ability to absorb carbon and support a sustainable local food system. This land is finite—once it is developed, it cannot be easily returned to its agricultural use. As the **Dufferin Climate Action Plan (DCAP)** highlights, "Protecting agricultural land is crucial to ensure local food security and resilience to climate change. Sustainable agricultural practices, combined with the preservation of farmland, play an essential role in maintaining biodiversity and reducing greenhouse gas emissions."

The proposed zoning amendment undermines Dufferin County's long-term sustainability goals and directly opposes the objectives outlined in the Climate Action Plan. By compromising agricultural lands, the County jeopardizes future food production and resilience in the face of climate challenges.

3. Environmental Risks and Proximity to Luther Marsh Conservation Area

The location of this proposed development adjacent to the Luther Marsh Conservation Area raises critical environmental concerns. The marsh serves as an essential ecological buffer, providing flood control, supporting biodiversity, and playing a critical role in local water filtration. Any new development in such close proximity poses a grave threat to the ecological balance of this sensitive area.

The **Dufferin Climate Action Plan** projects a marked increase in annual precipitation over the coming decades, with more frequent and intense storm events. Development so close to a conservation area that already mitigates significant climate risks, including flood control and habitat preservation, could undermine its ability to function effectively in a changing climate. By increasing impervious surfaces and disrupting natural drainage systems, this development would exacerbate the risk of flooding, which would not only endanger the developed site but also undermine the marsh's ability to protect the broader watershed, including downstream properties and ecosystems.

4. Minimum Distance Separation (MDS) and its Restrictive Impact on Farming

Minimum Distance Separation (MDS) regulations are designed to minimize conflicts between agricultural and non-agricultural uses by requiring buffer zones between livestock operations and residential properties. These regulations help to manage the odors, noise, and other potential nuisances from farming operations, ensuring that both agricultural and non-agricultural communities can coexist peacefully.

However, the introduction of non-agricultural developments severely limits the flexibility and growth potential of farming operations, particularly in the livestock sector. Livestock farming requires large buffer zones to meet MDS requirements, and as more non-farm lots are introduced, these zones expand, making it harder for farmers to adjust their operations, increase herd sizes, or diversify their livestock products. This restriction is particularly problematic for the long-term planning of agricultural operations, where flexibility is key for adapting to market changes or emerging technologies. As the report on rural non-farm development notes, "The most significant impact of rural non-farm development on agriculture is the introduction of minimum distance separation as a result of a residential use being established in the countryside."

The proposed zoning amendment would expand MDS restrictions, reducing the economic viability of local farms by hindering their ability to grow or modernize. In particular, livestock operations would face long-term constraints, ultimately driving farms out of business and leading to further land fragmentation.

5. Conflicts Between Agricultural and Non-Agricultural Land Uses

Allowing residential or non-agricultural development in rural areas inevitably leads to conflicts between farmers and new residents. Agricultural activities such as crop cultivation, livestock management, and the use of machinery generate odors, noise, and dust that are intrinsic to farming operations. These activities, while legally protected under the **Farming and Food Production Protection Act (FFPPA)**, often become points of contention with nearby residents unfamiliar with rural life. Complaints and disputes are not uncommon and can result in undue restrictions on farming operations, placing additional burdens on agricultural landowners.

Furthermore, MDS regulations could hinder the expansion of agricultural operations in the future. As my family and other farmers in the region look to grow or modify our operations to meet new demands, the introduction of non-agricultural development in close proximity would severely restrict our ability to do so. In effect, this amendment would create unnecessary barriers to the growth and modernization of the local agricultural economy, directly contradicting provincial objectives to preserve and enhance agricultural production.

6. Growth Management and Prevention of Urban Sprawl

Both the **Grand Valley Official Plan** and the **Dufferin County Official Plan** emphasize the importance of directing growth into designated settlement areas and preventing the expansion of urban sprawl into agricultural and rural lands. The proposed zoning

amendment disregards these carefully considered growth strategies by promoting development in areas that are not designated for such purposes.

The long-term costs associated with urban sprawl are well-documented: the extension of infrastructure such as roads, water, and sewage systems to serve dispersed developments is not only costly but inefficient. Additionally, sprawling development patterns contribute to increased greenhouse gas emissions by encouraging car-dependent lifestyles and limiting opportunities for sustainable, compact community planning. Given that the Town of Grand Valley and the County of Dufferin are working towards reducing their environmental footprint, allowing this type of unchecked development would be a step backward.

7. Cumulative Impact of Non-Farm Development

Even modest non-farm development has a cumulative effect over time. While individual developments may seem minor, they contribute to significant land loss and agricultural restrictions over the long term. Small, incremental developments fragment agricultural lands, introduce new infrastructure like roads and utilities, and create new parcels of land that are not suitable for farming.

The cumulative impact is particularly detrimental in areas where the agricultural land base is already under pressure. Non-farm developments also exacerbate MDS restrictions, reducing the total amount of land available for farming. Over time, these developments erode the viability of agricultural operations, leading to a gradual degradation of the agricultural landscape. As the report on rural development states, "Each new non-farm lot created adds to the cumulative effect of fragmenting the agricultural land base."

The proposed zoning amendment, while limited in scope, contributes to this broader trend of agricultural land fragmentation. Over time, these small changes compound, making it more difficult to sustain viable farming operations and jeopardizing the long-term sustainability of agriculture in Dufferin County.

8. Land Use and the Mitigation of Climate Change

Land use decisions are essential in mitigating climate change and helping communities adapt to its inevitable impacts. The **Dufferin County Climate Action Plan (DCAP)** emphasizes the need for compact, connected communities to minimize the environmental footprint of development, reduce carbon emissions, and increase the sustainability of municipal services. Urban sprawl, resulting from unchecked zoning amendments, is contrary to climate-smart development. It not only increases greenhouse gas (GHG) emissions due to greater reliance on private vehicles but also stretches municipal resources—such as infrastructure, emergency services, and utilities—requiring more energy and resources, further contributing to the County's carbon footprint.

Compact development that prioritizes existing infrastructure and encourages mixed-use communities can significantly reduce emissions by making communities more walkable and transit-friendly. Sprawl-based development, like what is proposed through this zoning amendment, undermines the County's intent to create resilient, low-carbon communities. As the DCAP outlines, "Dufferin County's approach to land use planning must prioritize compact, connected communities to mitigate climate change and reduce the need for car-dependent development."

The proposed zoning amendment directly contradicts this goal by encouraging non-agricultural development in rural areas, which would increase GHG emissions and weaken efforts to promote sustainable, low-carbon communities.

9. Growth Management: Directing Development to Settlement Areas

The **Dufferin County Official Plan** lays out a clear growth management strategy, prioritizing the concentration of development within designated settlement areas where municipal infrastructure and services are available to support increased population and employment. This approach not only reduces the need to expand into rural and agricultural lands but also ensures that growth occurs efficiently, utilizing existing resources without burdening the County with unnecessary infrastructure expansion costs.

The proposed zoning amendment threatens to disrupt this careful growth management strategy by encouraging development outside of designated settlement areas, leading to the unnecessary consumption of rural and agricultural land. Such developments require costly infrastructure expansions, including roads, water, and sewage systems, that are not only inefficient but often result in increased taxes for residents. Sprawling development patterns also increase reliance on private vehicles, contributing to higher GHG emissions and greater traffic congestion, which contradict the County's commitment to reducing its environmental impact. As the Official Plan states, "The majority of future growth will be directed to the urban settlement areas that are on full municipal services, and to a lesser extent to the community settlement areas which are able to accommodate additional growth."

By allowing development in agricultural areas, the proposed amendment undermines the County's efficient growth management strategy, further contributing to urban sprawl, inflated infrastructure costs, and environmental degradation.

10. Promoting Intensification and Infill Development

The **Dufferin County Official Plan** emphasizes the importance of intensification and infill development within existing urban areas to accommodate growth while minimizing the need for expansion into rural and agricultural lands. Intensification involves increasing the

density of urban areas through the redevelopment of vacant or underused lots, the addition of housing units, and the promotion of mixed-use developments. This approach allows municipalities to meet growth needs without consuming additional rural or agricultural land, reducing infrastructure costs, and encouraging the creation of more compact, walkable communities.

The proposed zoning by-law amendment, by enabling non-agricultural development in rural areas, directly conflicts with this intensification-first strategy. Development in agricultural zones not only undermines efforts to protect vital farmland but also leads to inefficient, low-density sprawl, which is environmentally unsustainable and costly to maintain. Densely built communities promote greater public transit use and reduce transportation emissions, while sprawling, car-dependent developments further strain municipal resources and increase the County's carbon footprint. As the Official Plan notes, "Intensification reduces the need for settlement area expansions encroaching into the County's Agricultural Area, and contributes to the protection of prime agricultural areas."

The proposed zoning amendment contradicts the Official Plan's goal of promoting intensification and infill development and would instead contribute to urban sprawl and the degradation of agricultural lands that are critical for the region's environmental sustainability and food security.

Conclusion

The proposed zoning by-law amendment is short-sighted and inconsistent with the long-term vision for Grand Valley's development. It threatens prime agricultural land, puts local ecosystems and conservation areas at risk, and promotes urban sprawl that will burden the town's infrastructure and natural resources. Furthermore, it undermines the core principles of sustainable growth and responsible land stewardship that are enshrined in both provincial and local planning documents.

I strongly urge the Grand Valley Town Council to reject this proposed amendment. In doing so, the Council will protect not only the interests of farmers and rural landowners but also the broader community's environmental sustainability, food security, and economic resilience for generations to come.

Thank you for your attention to this matter. I look forward to your thoughtful consideration and remain available for any further discussions on the implications of this proposed amendment.

Sincerely,
Maria Lelli-Dickson