



County of Brant Council Report

To: The Mayor and Members of County of Brant Council
From: Brandon Kortleve, Manager of Policy Planning, Policy Planning Division, and Emily Stanley, Nethery Planning, Consulting Planner for Policy Planning Division
Date: April 14, 2026
Report #: RPT-0154-26
Subject: Omnibus Official Plan Amendment (OPA3-D-25) – Agricultural System Policies
Purpose: For Approval

Recommendation

That Report RPT-0154-26, regarding updated Phase 1 of the Omnibus Official Plan Amendment, consisting of the Agricultural System policy updates, be received as information; And that the proposed by-law attached hereto as Appendix “C”, to amend the County of Brant Official Plan, A Simply Grand Plan (2023), by adding new policies with respect to the Agricultural System, BE APPROVED.

Executive Summary

Consistent with the Provincial Planning Statement, 2024, the County’s Official Plan adopts an agricultural systems approach to protecting and strengthening its agricultural land base. The agricultural system is comprised of lands designated Agriculture, Countryside, and Rural Lands, each of which plays a distinct role in supporting agricultural production, rural economies, and long-term land use compatibility.

This Official Plan Amendment implements refinements to the agricultural policy framework to improve clarity, consistency, and effectiveness in protecting the integrity of the agricultural system. The amendments reinforce the prioritization of agriculture, strengthen policies related to lot creation and consent applications to address ongoing land fragmentation, and clarify the scale, location, and compatibility of non-agricultural uses. The revised structure consolidates existing and proposed policies into a more coherent framework that is easier to interpret and apply for landowners, applicants, and reviewing agencies.

Overall, the amendment represents a refinement of policy implementation rather than a change in policy direction, supporting long-term agricultural viability, alignment with Provincial policy, and the effective administration of the Official Plan.

Strategic Plan Priority

Strategic Priority 2 - Focused Growth and Infrastructure

Impacts and Mitigation

Social Impacts

The amendment supports the long-term protection and viability of the agricultural system by ensuring permitted uses across the agricultural land base are appropriate. Revisions to consent policies are intended to limit further land fragmentation, a key concern raised through public engagement for *A Simply Grand Plan, 2023*, while maintaining necessary flexibility for farm operations

Environmental Impacts

The proposed amendment is policy-based and does not introduce development permissions that would result in environmental impacts. The policies reinforce the protection of the agricultural land base through long-term land use planning.

Economic Impacts

The amendment aims to enhance policies regarding on-farm diversified uses and non-agricultural uses in the County, including home-based businesses and home-based industries. These uses ensure protection of the agricultural system and farming operations, while encouraging rural economic vitality.

Report

Background

In mid- 2025, the County initiated an omnibus Official Plan Amendment (OPA) project to update select sections of the Official Plan to ensure policies remain current, effective, and aligned with Provincial policy, emerging issues, and local implementation experience. The amendments are being advanced on a topic- by- topic basis, allowing for focused review and engagement outside of a comprehensive Official Plan review.

The agricultural policy review was first presented to the Agricultural Advisory Committee in May 2025 ([Report RPT-0225-25](#)), where feedback received helped inform the initial drafting of the proposed amendments. The project was subsequently introduced to Council in June 2025 ([Report RPT-0243-25](#)), and a statutory public meeting was held on July 8, 2025 ([Report RPT-0243-25](#)) to share project information and to receive preliminary input from the public and stakeholders.

The first set of draft agricultural policies were presented for information at a statutory public meeting on November 11, 2025 ([Report RPT-0387-25](#)). Through the review process, comments were received from the Province, members of the agricultural community, and the public. Staff also considered implementation experience and issues identified through recent development applications and planning inquiries.

Minor adjustments were made to the proposed policies in response to comments received, primarily to improve clarity, consistency, and implementation. This report presents the final draft Official Plan Amendment for Council's consideration, along with an analysis and planning justification demonstrating consistency with provincial policy and alignment with County objectives.

Analysis

Existing Policy Framework

The Provincial Planning Statement, 2024 builds on the matters of Provincial interest in Section 2 of the Planning Act, establishing a strong Provincial interest in protecting the agricultural land base and supporting the long-term viability of the agri-food network, including the requirement to use an agricultural systems approach to enhance a geographically continuous agricultural land base. Municipal official plans are the primary vehicle for implementing these objectives at the local level.

Part 5, Section 2.1 of the Official Plan implements this direction by treating farmland as a continuous and interdependent component of the agricultural system rather than a collection of individual parcels. The emphasis on system integrity and long-term viability means that for example, individual requests for rural residential severances are not supported. The policy framework of the 2023 Plan improves on longstanding planning objectives intended to protect agricultural lands and advance this broader public interest of the County.

Across the Agriculture, Countryside, and Rural Lands designations, the Plan prioritizes agricultural use, limits non-farm development, discourages fragmentation, and relies on Minimum Distance Separation (MDS) as the primary tool for managing land use compatibility in this context. Although the overall policy intent is clear, experience applying these policies has identified gaps between intent and implementation. The policies of this section of the Plan are intended to:

- a) Safeguard the integrity, continuity and productivity of the agricultural land base.
- b) Enable long-term viability and evaluation of agricultural operations.
- c) Maintain land use compatibility through an agricultural-first framework that prioritizes avoidance of potential conflicts.
- d) Reinforce the growth management hierarchy that directs growth away from prime agricultural areas.
- e) Ensure that any development that does happen reflects the scale, function and servicing context of the area.

Implementation Barriers

Key challenges in implementing the County's agricultural policy framework have emerged over the last 26 years, particularly the cumulative impacts of incremental fragmentation that has resulted from consent applications. Over 60% of the properties within the County's prime agricultural area are 10 hectares in area or less (2,370 properties out of approximately 3870). Although rural residential severances are no longer supported (as of 2023), surplus dwelling severances are not consistently achieving the intended outcome of long-term farmland consolidation that would help address fragmentation. In practice, they have resulted in the permanent separation of dwellings from farm operations without a corresponding benefit to the greater agricultural land base. This approach has created over 4000 hectares of farm parcels where no dwelling can be constructed (indicated with a site-specific A-9 zoning code).

Additional implementation challenges have arisen from ambiguity in policy interpretation and application. Unclear distinctions between agricultural uses, agriculture-related uses, and on-farm diversified uses have created uncertainty for applicants and decision makers, highlighting the need for clearer, locally tailored direction consistent with provincial guidance, including [OMAFRA Publication 851](#). Further issues have included overly complex and duplicative MDS policies and limited direction on addressing the cumulative impacts of non-agricultural uses within the agricultural system.

Collectively, these issues underscore the need for more clear and operational policies that better translate the Plan's systems-based agricultural objectives into consistent decision-making. With the adoption of the current Plan, the County of Brant took a deliberate shift away from rural residential severances to better align with Provincial policy and address the long-term fragmentation of the agricultural land base. Experience across the County has demonstrated that introducing residential uses into agricultural areas can undermine farm viability and land use compatibility. A key direction of this Plan is therefore to continue refocusing policy implementation on prioritizing agriculture, strengthening system integrity, and protecting agricultural lands from further fragmentation.

Policy Changes – Proposed October 2025

The October 2025 proposed amendments were intended to clarify and strengthen the existing framework and address the issues identified above. Key changes included tighter consent policies to limit fragmentation, clearer expectations for surplus farm dwelling severances, expanded justification requirements for technical severances, and improved clarity around MDS application and livestock expansion priorities. These changes were largely focused on improving implementation rather than altering policy objectives.

Policy Changes – Proposed April 2026

The current version consolidates and refines both the existing policies and the October 2025 amendments into a more coherent/clear agricultural system framework. The proposed policies reaffirm the agricultural system as the organizing structure, clarify the hierarchy of supported uses and applicable scale through objective limits, refine lot creation policies to protect functional farm units rather than relying on lot size alone, and simplify MDS provisions while maintaining strong protection for agricultural operations. Together, these refinements are intended to improve clarity, predictability, and alignment with Provincial policy while reinforcing the Plan's long-standing agricultural system objectives.

Policy Directions and Justification

This Official Plan Amendment introduces a refined agricultural policy framework that strengthens the County's system-based approach while improving consistency, predictability, and long-term agricultural protection. Key directional changes include:

- Clearer limits to the scale, intensity, and location of non-agricultural uses within the agricultural system.
- Stronger reliance on functional farm integrity and agricultural system outcomes rather than parcel-based metrics alone.
- Expanded use of Agricultural Impact Assessments to address cumulative impacts and system-level effects.
- Greater prioritization of livestock expansion and farm flexibility.
- Refined surplus farm dwelling severance policies to ensure consolidation and prevent incremental fragmentation.

These changes are intended to improve implementation results rather than alter the fundamental objectives of the Official Plan. A detailed planning rationale supporting these policy directions is provided in Appendix A: Detailed Planning Rationale and Justification.

Comments Received

To build on the discussions at the May 2025 Agricultural Advisory Committee ([Report RPT-0225-25](#)), staff circulated the proposed changes to the Brant County Federation of

Agriculture, and collected feedback from The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA).

The Province provided comments focused on ensuring alignment with Provincial agricultural policy and improving the practical application of land use compatibility tools, particularly MDS. This led to the organization structure of the proposed policies, focusing on the agricultural systems approach. OMAFRA recommended greater flexibility and clarity in policies related to Additional Residential Units (ARUs) outside settlement areas, including how MDS calculation points can be established from existing structures, the use of physical separation measures near active agricultural operations, and consolidating residential entrances, but providing flexibility for separate farm access where appropriate for safety and operational efficiency (which the County's entrance By-law already accounts for).

Additional comments encouraged clearer terminology and definitions in surplus farm dwelling and consent policies, alignment with PPS wording, and refinements to MDS policies to better reflect provincial guidelines, including the scope of facilities reviewed and clarification that MDS applies to permanent livestock facilities rather than odours from manure or digestate application. All of these comments have been integrated into the proposed policies and a chart of the comments received has been included as Appendix B of this report.

Summary and Recommendations

While the existing policies of the Plan establish a strong agricultural systems vision, changes are needed to respond to practical implementation challenges and improve outcomes.

The proposed amendments integrate improvements into a cohesive, accessible, and consistent framework that more clearly honours and enforces the original systems-based intent of the Plan. This evolution represents a refinement of policy delivery, not a departure from Council's previously adopted agricultural land protection objectives.

The amendment is in alignment with Provincial interests outlined in the Planning Act, 1990, and is consistent with Provincial Planning Statement, 2024, providing an agricultural system approach that maintains and enhances a geographically continuous agricultural land base, supporting and fostering long-term economic prosperity and productive capacity of the agri-food network. The proposed amendment underscores the importance of protecting the County's strong agricultural system, which remains a foundational goal of the Official Plan.

This amendment reflects good planning practice, as it strengthens the existing policies and aligns with the Provincial Planning Statement, 2024, and the Planning Act, 1990, and staff are recommending that Council adopt the amendment as drafted in Appendix C of this report.

Attachments

Appendix A – Detailed Planning Rationale and Justification
Appendix B – Comments Received
Appendix C – Draft Official Plan Amendment By-Law (OPA3-D-26)

Reviewed By

Jeremy Vink, Director of Planning

Copied To

Alysha Dyjach, General Manager of Development Services
Dan Namisniak, Manager of Development Planning

By-law and/or Agreement

By-law Required Yes

Agreement(s) or other documents to be signed by Mayor and /or Clerk No