



March 3, 2021

File: A21/01

Michael Czarny, Planning Services
Regional District of Central Okanagan
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Re: Non-adhering residential use application, 2570 Old Vernon Road

Dear Michael,

Thank you for providing B.C. Ministry of Agriculture, Food and Fisheries staff the opportunity to comment on the referenced application. We have reviewed the documents you provided and offer the following comments:

- We understand that the applicant wishes to build a shop with an accessory home over it thus minimizing the overall footprint by combining two uses into one structure. While the proposed location apparently does not require additional infrastructure support or the conversion of existing cropped area, additional residences on agricultural parcels can lead to rising agricultural land costs and increased farm practice complaints if the property is sold in the future.
- The rationale for the proposed request includes compassionate reasons due to the applicant's recent health issues.
- The applicant's parents would live in the residence while providing services such as financial assistance, childcare, homecare and administrative duties. While supportive, particularly as the applicants have experienced health issues, this type of work is not typically considered direct farm labour.
- The applicants conclude that their proposal meets the criteria of the 2020 Ministry of Agriculture Policy Intentions Paper. However, to date no changes have been made to the [Agricultural Land Reserve Use Regulation](#) with respect to residential uses.
- The type and scale of the farm is consistent with the need for on-farm accommodation of farm labour when the fruit trees become productive. The application states that the original farmhouse will be used for this labour when it becomes necessary. It is unclear if this will be sufficient or if further farm labour accommodation will be sought.
- The applicants point out that a permanent structure is an asset which will increase the financial value of the property while a manufactured home will not do so. We note that the intent of an additional residence within the ALR is not to increase the financial value of the property. While increasing the financial value of property through building construction may be positive for the current owners it carries the potential for a longer term price rise not connected to the productive capacity of the land and can cause a financial barrier to new and existing farmers.

If you have any questions please contact us directly.

Sincerely,



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Cc Sara Huber, Agricultural Land Commission