



**Kings County Federation of Agriculture (KCFA)**

**Position Paper on the proposed Kings 2050 Municipal Planning Strategy (MPS)  
and Land Use Bylaws (LUB)<sup>1</sup>**

**May 2015**

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### Executive Summary.

- The KCFA Board supports the new Agricultural Priority designation containing the Agricultural High Capability zone (AH zone) and the Rural Mixed zone (RM zone). All land presently zoned A1 should be zoned AH.
- The KCFA Board recommends that the KCFA Board of Directors act as an advisory body in the planning process in all matters relevant to agriculture.

#### Specifically:

- A. All the new setback and separation distances in the AH zone are supported. All the new setback and separation distances in the RM zone are supported with the exception of the 500' maximum setback. It is recommended that this be reduced to 200'.
- B. Agricultural processing as a stand-alone operation is supported.
- C. Accessory retailing and restaurants for wineries are supported.
- D. Farm stays and agritainment for working farms are supported but it is anticipated that correctly identifying "working farms" will require the participation of the KCFA.
- E. Phasing out pre-94 lots is regarded as a worthwhile goal but it may prove difficult to achieve until some compensation is offered to holders. Introducing other controls on the building permit may be more feasible.
- F. Eliminating the use of soil maps on a site-specific basis is supported.
- G. Greater flexibility with infill housing is not supported if it leads to more infill housing in the AH zone. It is recommended that infill housing be assessed on a case by case basis using site plan agreements with the set criteria reviewed by the KCFA.
- H. Allowing a secondary farm dwelling on the same lot is supported. Project P14-10 should be considered as part of the Kings 2050 plans and follow the recommendation of the Agricultural Review Committee.
- I. Considering cluster housing in the RM zone is supported only if controlled by development agreement with legal devices to limit nuisance complaints.
- J. Expansion of urban centres is supported but only in a gradual fashion as solid proof demonstrates that the supply of building lots is limiting. Calculations on the potential housing supply can supply the necessary proof but calculations based on present boundaries are needed. The Urban Holding zone need only be used in the Kentville – Wolfville region.
- K. It is recommended that the 20 acre lots be removed from the LUB.
- L. It is recommended that the present definition of *bona fide* farm be replaced with the simpler definition used by the Nova Scotia Federation of Agriculture of "a registered farm" subject to inspection by experienced farmers.
- M. The KCFA Board recommends that the traditional farmlands on the periphery of North Kentville, Greenwich and Canning be zoned AH and not included in the proposed Urban Centres.
- N. Farms located in the Resource Priority zone should follow similar bylaws as farms in the RM zone.
- O. All other zones where agriculture is mentioned are supported.
- P. Future ideas include contacting the A.V. Farmland Trust and "Agricultural Reserve" zones.

### **Opinions expressed in this Position Paper:**

This paper contains research performed by the elected nine member Board of the KCFA to determine ramifications of the Kings 2050 MPS and LUB and how these proposals will be implemented. The findings were distributed directly (Canada Post) on April 22<sup>nd</sup> to 379 registered farmers in Kings County who elected during their annual registration to be members of the KCFA. Six days later on April 28<sup>th</sup> a reminder was sent out by e-mail to the 160 members who had supplied their e-mail addresses. The cover letter (included in Appendix 1) shows that the timeline was unavoidably tight because Council had imposed a deadline for feedback of April 30 (and this was already an extension). Because the goal was to submit a position paper representing the views of as many KCFA members as possible the cover letter stated: **“If we do not hear from you before April 30<sup>th</sup> we will assume that you are comfortable with the opinions in the position paper and you consent for us to communicate same to Kings County Council”**.

Feedback was collected until May 4<sup>th</sup> and accounted for a small but significant number of the membership. The KCFA Board realizes that counting the silent majority is not perfect and is definitely not suggesting that the remaining farms are in complete accord with every word in this document, however it is assumed that the majority of KCFA members are comfortable enough to let the general approach of this position paper stand.

The Board did find that the comments submitted were exceptionally useful and have incorporated many of the points raised. Four topics evoked the most comments, namely *Expansion of Urban Centres, Phasing out pre-94 Lots, Infill Housing and Cluster Housing*.

### **Overview:**

The major proposal in the Kings 2050 MPS and LUB which directly impacts agriculture involves replacing the current agricultural district of 99,029 acres, where most of the land is zoned A1 (98,211 acres), with an Agricultural Priority District of 264,810 acres. This district will be zoned Agriculture High Capability (AH; 95,583 acres) and Rural Mixed (RM; 154,760 acres)

The above figures on the acreages in the different zones reveal an apparent increase in land with an agricultural priority of 165,781 acres. While it could be argued that such an increase is symbolic, land capable of agricultural production has always been there, the wording “Agricultural Priority” begs the question who will be there to determine what activities are in the best interests of “Agricultural Priority”?

*Recommendation: The Board of Directors of the KCFA act as an advisory body in the planning process in all matters relevant to agriculture.*

The above figures also reveal a loss of 2,628 acres in the AH zone compared to the present A1 zone. This is an unfortunate beginning as it gives the impression that the new Agricultural Priority district is starting off on a bad foot. The *No Farms No Food* organization has identified 3 large blocks of A1 land on the North Mountain measuring approximately 3000 acres where it is

proposed to change the zoning to RM. The KCFA Board questions the reason for this and advises that these blocks be zoned AH. The same applies to the many smaller pockets of A1 land on the Valley floor – they should all be zoned AH.

### **Specifics:**

#### **A. Setbacks & Separation Distances.**

All distances in the AH zone have been reduced from those currently imposed for the A1 zone. Thus front yard setbacks have been reduced from 150' to 40' for a small livestock operation and 100' for a large livestock operation; side and rear yard setbacks from 200' to 100'; watercourse setbacks from 300' to 100', setbacks for a neighbouring dwelling from 300' to none and maximum setbacks for non-farm dwellings of 200'. Discussion with the Planning Department revealed that past distances were considered unnecessary but also reflected a philosophy that in an Agricultural Priority zone residents living there could not expect to be completely isolated from agricultural activity. The KCFA Board finds this attitude refreshing and believes that if it is backed up with something substantial (perhaps restrictive covenants for new houses?) then it could reduce "nuisance" complaints and allow farmers to focus on farming.

The question arises how small and large livestock operations will be defined and also how an operation which starts off small but grows large will be handled. The KCFA Board agrees that the old setbacks were excessive and welcomes the proposed reductions. The argument was put forward that manure handling plans were key and that with good plans livestock operations of any size could be accommodated at 40'.

In the RM zone most of the distances are similar to the AH zone with two exceptions. The minimum setback for a neighbouring dwelling is 250'. This reflects the fact that an important aspect of the RM zone is to provide housing options for people who want to live in the country. Conflicts can easily arise between housing and farming on agricultural land but the KCFA Board cannot deny the right of citizens to live there. However there are too many options in the 2050 proposals to accommodate housing in both the AH and RM zones; pre-94 lots, infill housing, cluster housing, general strip development plus the expansion of urban centres. This seems to water down the concept of agriculture as the priority and suggestions are offered in the paragraphs which follow to make sure an appropriate balance is found between development and conservation.

The second difference in the RM zone is the provision of a 500' maximum setback for new dwellings. The KCFA Board unanimously found this distance incompatible with agricultural priority and not in compliance with stated policy in the proposed MPS to reduce fragmentation of agricultural lands.

*Recommendation: Reduce the maximum setback for new dwellings in the RM zone to 200'.*

**B. Agricultural Processing as a Stand-Alone Operation.**

The KCFA Board realizes that local processing of agricultural product is an important value-added process and supports such developments.

**C. Accessory Retailing and Restaurants for Wineries.**

The KCFA Board is excited by the thriving wine and grape growing industry in the province, and in Kings County in particular, and supports the continued growth of this industry.

**D. Farm Stays and Agritainment for Working Farms.**

Agri-tourism operations currently operating (e.g. Noggins and Dempsey Corner Orchards) demonstrate how such activity can be an important revenue stream. The KCFA Board is aware that Nova Scotia has the largest percentage of small farms in Canada and that revenue from agri-tourism could help these small farms grow. It is important however that the definition of “working farms” is not too severe to exclude the very farms which need this revenue the most. Farm stays are also important for the wine industry and for regions where conventional tourist accommodation is sparse.

*Recommendation: The KCFA, in consultation with the planning department, will work out guidelines for implementing agri-tourism to ensure that “working farms” are correctly defined and no deserving farm is excluded (see the considerations on “bona fide” farms in item L). Guidelines can also be formulated to ensure that any infrastructure needed does not lead to the loss of productive agricultural land.*

**E. Phasing out pre-94 Lots.**

The KCFA Board agrees with the opinions expressed throughout the farming community that these lots are bad news for the future of farming in Kings County, however taking away these lots will be challenging. The backlash from previous attempts to do so speaks to the unpopularity of such a move. Comments received on this issue acknowledged that phasing out these lots will represent a financial loss to the holders and that some creative compensation should be explored. Such ideas were mentioned in the 2010 Agricultural Land Review Report and included property tax credits and the use of land trusts. The KCFA supports phasing out these lots but believes that having some compensatory mechanism available will make for a much smoother process. In the meantime perhaps it would be wise to limit the development allowable on these lots by establishing maximum building lot sizes and controlling the location of the house to prevent further development such as infill housing. Use of a site plan agreement is recommended for the remaining parcel of land.

(Site plan agreements are a land use planning tool enabled by the *Municipal Government Act* and have characteristics of both as-of-right zoning and development agreements. Like as-of-right zoning, site plan approvals are administered by a Development Officer who has the authority to approve or reject applications. Unlike development agreements, this process does not involve a public hearing or a Council vote, unless the Development Officer’s decision is

appealed to Council. Site plan agreements are site specific, negotiated based on set criteria and registered with the property.)

A concern expressed by several farmers was that this process depends on the opinion of one person; the Development Officer. In order to gain acceptance by the farming community, the KCFA Board believes that all “set criteria” involving farm decisions be transparent and reviewed regularly.

*Recommendation: Explore compensatory mechanisms to lessen the financial losses to pre-94 lot holders and then start a phase-out. Explore controlling development on these lots to minimize conflicts with farming. Use site plan agreements where all set criteria used in site plan agreements and development agreements involving agriculture be reviewed with the KCFA Board and the Board be notified when any decisions go to appeal.*

#### **F. Eliminating the Use of Soil Maps on a Site-Specific Basis.**

David Poole has explained to the KCFA Board how budget constraints back in the 70s when these maps were drawn necessitated cutting corners and limiting their precision. Most farmers know this from inconsistencies between the maps and what they observe on their own properties. Over-interpretation of these maps on a site-specific basis has led to abuse such as looking for poor soil lots. The KCFA Board did ask if these maps could ever be updated to avoid these problems but the cost is still considered prohibitive. The KCFA Board therefore supports eliminating their use on a site-specific basis but realizes that advice from an industry expert or agronomist may be needed in certain cases.

#### **G. Greater Flexibility with Infill Housing.**

The prospect of more infill housing in the AH zone was very troubling to the KCFA Board. Most farmers expressed the view that gaps of 400 to 500’ between houses were definitely worth farming especially with cash crops – such gaps could easily amount to 3 - 5 acres. In addition these gaps often provide access to the field behind. However if infills are encouraged along a particular road then the land price shoots up to a point where it is uneconomical for the farmer to buy these parcels. Of course whether the land is cleared or not is relevant too. With all these factors at play the KCFA Board feels that all potential infill housing lots in the AH zone need to be identified/quantified and then the suitability of allowing development can be determined on a case by case basis.

*Recommendation: Allow infill housing in the AH zone on a case by case basis using the site plan agreement tool where all the set criteria used are reviewed by the KCFA Board.*

#### **H. Allowing a Secondary Farm Dwelling on the Same Lot.**

This is a welcome development. Farmers carry the responsibility of growing food and fibre for society and being responsible stewards of the land but they are also just folks who cherish being close to family; be it parents, children or grandchildren. A secondary dwelling makes this possible as well as providing a home when they retire after dedicating their lives to their land.

This secondary farm dwelling must be built in close proximity to the primary dwelling so as not to diminish crop lands and remain with the farm and cannot be sub-divided later.

An amendment presently before Council (**Project P14-10. Subdivision of Farm Dwellings**) is relevant to the topic in this section but is being processed outside the envelope of the Kings 2050. The intent is to explore whether it is possible to separate off the primary farm dwelling (the “farmhouse”) from associated farmland using the site plan agreement tool (see item ‘E’ as to how this tool works). The decision of the site plan agreement is registered on the deeds of the separated farmhouse and the remaining parcel of land. No other farm dwellings or non – farm dwellings will be allowed on the parcel of land. At the moment it is only older farmhouses which pre-date current bylaws which can be separated from farmland. The KCFA understands that this ‘grandfather’ clause will still stand and this amendment will only apply to newer farmhouses – it will not be possible to separate off tenements and bunkhouses. As mentioned above, this topic is highly pertinent to the Kings 2050 proposals and should be considered within this initiative. This topic was also examined exhaustively by the Agricultural Land Review in 2010 (Recommendation 4.4.1.a) and the KCFA Board is following that committee’s recommendation which stated:

*All farms would retain the ability to construct further dwellings for farm labour and retiring family members; however, the ownership of such dwellings will run with the land and not be permitted to be deeded separately, and should be confined to a limited acreage encompassing the farm dwelling and other farm buildings.*

#### **I. Considering Cluster Housing in the RM Zone.**

This proposal caused a split in opinion within the KCFA Board. It was recognized that clusters of up to 8 units consumed less land than 8 individual units in a strip development. The inclusion of >75% green space in these clusters was the sticking point. There was a concern that this could take too much land but then again it is suggested that some of this green space could be farmers’ fields. The bylaws propose that these developments be controlled by development agreement and the KCFA Board agrees with this and can add input on the set criteria as each agreement is considered. The KCFA Board feels that such cluster housing will lead to less conflict with farmers than strip development providing that residents respect the priority of agriculture. Concern was expressed that 8 residences clustered together can quickly develop the critical mass to lay nuisance complaints. This is a case where legal devices like restrictive covenants or “right to farm” bylaws should be explored.

*Recommendation: Permit cluster houses, and limit strip development, in the RM zone only through development agreements where the set criteria are assessed to ensure the priority of agriculture. Limit possible nuisance complaints with legal mechanisms such as restrictive covenants.*

## J. Expansion of Urban Centres.

The KCFA Board acknowledges that Kings County, and Nova Scotia in general, is under-populated and needs to attract people to move here. While encouraging people to settle in the already established urban centres makes sense if such expansions result in the loss of prime agricultural land then reasons must be supplied to justify the losses – this is a legal requirement under the Statements of Provincial Interests (see item M). The consensus of the board is that available lots should be used first and expansions allowed only when strong proof is there that additional space is required. Fortunately this proof can be readily found in the research already performed by the Kings County Planning department. Table 1 gives an overview of the department’s calculations for the proposed expanded boundaries taken from the Urban Boundary maps in the MPS draft document.

**Table 1: Potential Housing Supply in the Five *Expanded* Urban Centre Regions.**

REGION	POTENTIAL HOUSING SUPPLY	
	Potential Available Land <sup>1</sup>	Projected Capacity <sup>2</sup>
Kingston-Greenwood & Aylesford	1182 acres	59 - 296 years
Berwick-Coldbrook	1423 acres	65 - 335 years
Kentville-Wolfville <i>With Urban Holding(UH) of 808 acres</i>	1393 acres 2201 acres	26 - 121 years 41 - 191 years
Canning	171 acres	43 - unlimited years
Hants Border & Avonport	432 acres	96 - 864 years

- 1 Calculated as all vacant residential zoned land and residential zoned land that contains only one civic, but is over 5 acres in size.
- 2 The left-hand figure is the potential outcome under High Growth Trend @ current average density which would use the most amount of land the fastest. The right-hand figure is the outcome under Low Growth Trend @ potential increased density which would use land at the slowest rate.

The KCFA Board found the lack of calculations for the present, unexpanded boundaries wanting. Such calculations would help put these projections in context. The Urban Centre maps set the goal to allow for sufficient housing capacity for the next 30+ years under low or high growth trends. Many projections suggest that housing capacities are adequate for 100+ years – this may be over-kill. However this is still recognized as necessary and responsible planning because no one can predict how aggressive the housing market may become in the future. That said, the KCFA Board does not find it responsible to permanently remove agricultural land from production in 2015 to cover a need that might happen in 10, 20 or 50 years’ time. That land can still grow a huge amount of food in the interim years.

***Recommendation:*** *To better interpret the projections for the expanded urban centre boundaries, projections for the present boundaries are needed. Urban Boundaries should be expanded on a gradual basis as the need for housing within present boundaries becomes limiting. The potential housing capacity projections should be reviewed on a regular basis to demonstrate this need. This is particularly crucial if the expansion will remove prime agricultural land.*

Table 1 demonstrates that in only one region, Kentville-Wolfville, would the Urban Holding(UH) zone be required – the data shows only 26 years capacity without UH. According to the maps, UH zones are only proposed in two regions: Kentville-Wolfville and Berwick-Coldbrook. This suggests that land identified for Urban Holding in the Berwick – Coldbrook region (approximately 1577 acres) would be unnecessary . This is good news for agriculture because once land is earmarked for development the price immediately escalates and becomes uneconomical to farm – it essentially represents a permanent loss to farming.

*Recommendation: Remove the Urban Holding zone in Berwick – Coldbrook region and assign land to Urban Holding in Kentville – Wolfville gradually as it becomes needed.*

**K. 20 acre Lots.**

The KCFA Board was unequivocal on this topic: 20 acre lots have been a disaster and should be scrapped.

*Recommendation: Remove 20 acre lots from the LUB.*

**L. A bona fide farm.**

It is this definition in the LUB which entitles *bona fide* farmers to sell off 20 acre lots. The present definition reads:

*A bona fide farm means a farm in operation for at least 2 years immediately prior to the application for a permit for a farm dwelling consisting of a minimum of twenty (20) acres upon which either agricultural production or livestock operations has taken place during such two year period. A minimum of fifteen (15) acres of the twenty (20) acres must be classified for assessment purposes under the Assessment Act as agricultural resource property, except for livestock operations where it may be less.*

None of the present KCFA Board was involved with developing this definition and so cannot comment on some of the particulars. As its use is primarily to sell off 20 acre lots its usefulness could be questioned, however there might be a need to define “working farms” for agri-tourism. As an affiliate of the Nova Scotia Federation of Agriculture the KCFA is obligated to follow the definition used by the NSFA which is simply, “A Registered Farm”. No-one is usually excluded from registering a farm so this gives no information on how genuine the operation is. The KCFA Board believes that the best way to determine a *bona fide* farm is to have an experienced farmer inspect the farm.

*Recommendation: Remove the present definition of bona fide farm from the MPS/LUB and replace with the simple definition of a “registered farm “ subject to inspection by experienced farmers such as the KCFA or representatives from the appropriate commodity group.*

### **M. Statements of Provincial Interest (SPI).**

The Municipal Government Act includes several SPIs one of which is concerned with agricultural lands in Nova Scotia. There are two mandatory requirements under this SPI: 1) *planning documents must identify lands which meet the agricultural land definition* and 2) *planning documents must address the protection of agricultural land*. After this the language in the SPI is much gentler, thus:

- *Municipal Planning strategies must be reasonably consistent with the statements.*
- *They provide guidance rather than rigid statements.*
- *They must be applied with common sense, thoughtfulness, innovation and creativity.*

The KCFA Board received several eloquent submissions from farmers whose land is slated to fall within the expanded Urban Centre boundaries in North Kentville, Greenwich and Canning. In the former location an exhaustive dossier was submitted by the farmers involved which was also forwarded to Council. (One of the farmers comprising this group also complained that there was no communication from the Municipality about all the proposed re-zoning. The KCFA hopes that this was an exception and that as a rule all landowners are informed of re-zoning). These parcels of land all comprise active, prime agricultural land which has been farmed for decades, if not generations. It is the view of the KCFA Board that the reasons why these agricultural lands cannot be protected have not been addressed. This puts the Municipality in contravention of the SPI. Given the unpredictability of the housing capacities mentioned in item J and recent legal rulings where Kings County was found not to be in compliance with the SPI (e.g. the Port Williams Secondary Planning Strategy, 2010), the KCFA Board does not support including these farmlands in the new Urban Centre boundaries.

*Recommendation:* *Zone the traditional farmlands on the peripheries of North Kentville, Greenwich and Canning as AH.*

### **N. Farms in the Resource Priority (RP) Zone.**

The RP zone runs from the brow of the South Mountain down to Lake Torment with the stated goal of designating lands where recreation and natural resource development are given priority. The mix includes farming although the number of farms and acres of land farmed have not been quantified. Nonetheless the KCFA Board regards these farms as an important reserve of agricultural land which demands the same protection as farmland in the Agricultural Priority zone. The Agricultural Land Review Committee (2010) recognized the importance of lands like this RP zone in its Recommendation 4.1.4:

*The Provincial Government is the owner of a significant amount of land of good agricultural quality. That land should be clearly identified and managed in a method such that it is preserved for potential agricultural use. The Province should bind any future contracting parties on its own Crown forest lands to allow agricultural development post tree harvest at the Crown's discretion.*

This opens up the intriguing possibility of the County of Kings taking the lead on this idea and creating an "Agricultural Reserve" zone (see item P). At the very least, these farmlands should

be subject to the same bylaws as those enacted in the RM zone especially with respect to subdivision of the land

#### **O. Other Zones where Agriculture is mentioned.**

Agriculture is mentioned in other zones, namely: Agricultural Industrial zone, Agricultural Service zone and Farm Commercial zone. Agriculture can be practiced in the Campground zone and in certain Neighbourhood Priority zones. The KCFA Board supports all these activities.

#### **P. Future Ideas.**

There is a determination throughout the farming community that the loss of agricultural land in Kings County must stop. The KCFA Board hopes that the proposed Agricultural Priority District with an acreage of 264,810 acres will help in this regard and the Board will offer its expertise to ensure that agriculture is always the priority in this district. That acreage must remain at 264,810 acres but the conundrum of development versus conservation is ever-present. The Board would like to mention one development and one idea that are relevant: namely land trusts and agricultural reserves.

The Annapolis Valley Farmland Trust has developed major momentum recently and has many options that will assist in preserving agricultural land. The KCFA Board believes that they should be consulted as part of the Kings 2050 plans.

Agricultural Reserves were an idea that the KCFA Board discussed in response to some feedback received. Some farmers suggested that if ever agricultural land was removed then equivalent land should be offered as a replacement. Re-zoning land is always a thorny problem but this might be alleviated if the land was originally zoned as "Agricultural Reserve". The farms in the RP zone came up as a possible candidate.

#### **Conclusion and Acknowledgments:**

The KCFA Board is indebted to all the information produced on this vitally important subject in the past. Organizations such as No Farms No Food, N.S. Federation of Agriculture, N.S. Department of Agriculture, N.S. Land Review Committee (the William's Report) and the numerous commodity groups have all made it easy for the Board to get up to speed. Because the Board is elected to represent its membership every effort was taken to present a balanced position paper built on the paramount principle of protecting agricultural land but also acknowledging the need for a myriad of farming inputs from a healthy economy and ensuring that farming is an attractive career path where farmers are treated fairly and with dignity.

Kings County Council, its Planning Advisory Committee and Planning Department have to be commended for having the foresight to embark on the Kings 2050 planning initiative and for focusing so carefully on agriculture. Farming is central to this County. Dollar figures are often quoted to demonstrate the importance of farming but perhaps the job figures have more impact for Kings County residents accustomed as we are to hearing of the 3 major employers;

CFB Greenwood (~2400 jobs), Michelin (~1200 jobs) and the Kings Regional Rehabilitation Centre (~600 jobs). In 2004 the Acadia Centre for Small Business and Entrepreneurship conducted a study on “Agriculture’s Impact on the Kings County Economy” in which they estimated ~7200 jobs directly or indirectly from agriculture. This figure may now be dated but the agriculture employment multiplier of 2.9 will likely still remain the same. This indicates that for jobs directly linked to agriculture another 2.9 jobs are created indirectly. More recent figures from the 2011 Statistics Canada census showed direct agriculture jobs in Kings County at 3820. Apply the multiplier effect and it is **Agriculture with 11,078 direct and indirect jobs which is the real number one employer in Kings County.** The employer who just happens to grow our food; this is why these 2050 plans are so important. It is imperative that we get it right!

### **Further Information:**

Most of the material used in preparing this paper was taken from the following websites:

- The MPS draft document is at [http://www.kings2050.ca/components/com\\_wordpress/wp/wp-content/uploads/2014/09/Part-3-Designations-Draft-for-Public-Consultation-July-2014.pdf](http://www.kings2050.ca/components/com_wordpress/wp/wp-content/uploads/2014/09/Part-3-Designations-Draft-for-Public-Consultation-July-2014.pdf)
- The LUB Summary of Draft Changes is at [http://www.kings2050.ca/components/com\\_wordpress/wp/wp-content/uploads/2015/01/Land-Use-Bylaw-Summary-of-Draft-Changes-FINAL-Jan-2015.pdf](http://www.kings2050.ca/components/com_wordpress/wp/wp-content/uploads/2015/01/Land-Use-Bylaw-Summary-of-Draft-Changes-FINAL-Jan-2015.pdf)
- The Review of ‘Draft for Consultation’ Agriculture Priority Areas presented to the PAC on Feb 18,2015 is at [http://www.kings2050.ca/components/com\\_wordpress/wp/wp-content/uploads/2015/02/2050-Phase-3-Workshop-Agriculture-Feb-24-2015.pdf](http://www.kings2050.ca/components/com_wordpress/wp/wp-content/uploads/2015/02/2050-Phase-3-Workshop-Agriculture-Feb-24-2015.pdf)
- The guidelines for the SPI for agricultural land is at <http://novascotia.ca/dma/pdf/mun-local-government-resource-handbook-5-1.pdf>

**Appendix 1: Cover letter to the membership.**

32 Main Street  
Kentville NS B0P 1E0

April 22,2015

**Re: Position Paper on the proposed Kings2050 plans**

Dear KCFA member:

The Board of Directors of the KCFA has been approached by Deputy Warden Brian Hirtle to write a Position Paper on the proposed changes to the Municipal Planning Strategy and the Land Use By-laws in the Kings2050 plans. The enclosed document expresses the opinions of the 9 member Board and we now need to know how the general membership feels about these positions.

**We invite your feedback on this Position Paper**

**Please send comments to Gail Walsh - address above or via e-mail [gwalsh@perennia.ca] or phone 902-678-7722 or fax 902-6787266.**

There is great interest in learning how the majority of registered farmers feel about this issue but we realize that at this time of year, especially after such a hard winter, farmers have plenty of other chores to keep them busy. Accordingly:

**If we do not hear from you before April 30<sup>th</sup> we will assume that you are comfortable with the opinions in the position paper and you consent for us to communicate same to Kings County Council.**

Regards

Niels Langelaan (President)  
Hank Bosveld (Vice-President)  
Gail Sawler (Treasurer)  
Colin Bell (Director)  
Paul d'Entremont (Director)  
John Gerrits (Director)  
Kim Geser (Director)  
Mike Lightfoot (Director)  
Travis Pearson (Director)