



# Staff Report to Agricultural Advisory Committee

Planning and Development

FILE: 6635-20-2024-04

**REPORT DATE:** June 04, 2024                      **MEETING DATE:** June 27, 2024  
**TO:** Agricultural Advisory Committee  
**FROM:** Allison Dominelli, Planner  
**SUBJECT:** Non-Adhering Residential Use Application for 19731 Richardson Rd

---

## RECOMMENDATION(S):

THAT the Agricultural Advisory Committee:

- A. Recommends that Council forwards to the Agricultural Land Commission the Non-Adhering Residential Use application for additional farm worker housing at 19731 Richardson Rd, with a recommendation of support; AND
  
- B. Recommends that Council supports an amendment to the Zoning Bylaw to permit greater than 40 workers at 19731 Richardson Rd, if the Non-Adhering Residential Use application is approved by the Agricultural Land Commission for additional farm worker housing; OR
  
- C. Other.

---

## **PURPOSE**

To present an application for a non-adhering residential use for 19731 Richardson Rd (PID: 005-030-366), for additional temporary farm worker housing.

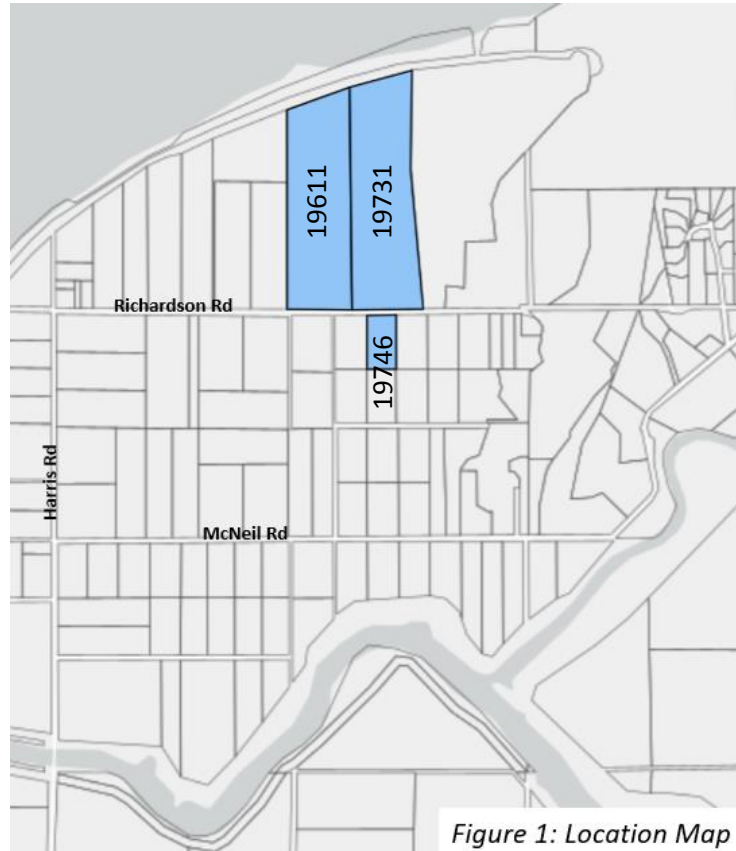
Information Report                       Decision Report                       Direction Report

## DISCUSSION

### **Background:**

The Hollandia Greenhouse farm operation consists of three legal parcels:

- 19731 Richardson Rd
  - Property size: 18.29 ha/45.17 acres
  - Farm uses: floriculture greenhouses, hay
  - Residential uses: single family dwelling; temporary farm worker housing for 40 workers
- 19611 Richardson Rd
  - Property size: 15.91 ha/39.3 acres
  - Farm uses: hay
  - Residential uses: single family dwelling
- 19746 Richardson Rd
  - Property size: 2.02 ha/5 acres
  - Farm uses: hay
  - Residential uses: single family dwelling



*Figure 1: Location Map*

The Hollandia Greenhouse farm operation is a hydroponic flower producer of dozens of varieties of gerberas, with farm gate revenues of about \$11 million dollars annually. It consists of approximately 7.9 ha (19.5 acres) of greenhouse growing space, plus 1.2 ha (3 acres) of assembly (flower arranging) and wholesaling space. The greenhouses are all located on the property at 19731 Richardson Rd.

In 2019, temporary farm worker housing for 35 workers was constructed on the property. It consisted of five trailers connected by a roof and decking, considered one structure and built on a temporary foundation. At that time, ALC approval was not required. Subsequent legislation was passed that requires ALC approval for all dwelling units beyond one principal residence. In 2020, an application was submitted to add a sixth trailer unit to house five more workers and was approved by the ALC.

Hollandia plans to expand its greenhouse area by 1.2 ha in 2025, which will result in an expressed need for additional farm workers. The applicant would like to add two more trailer units to the temporary farm worker housing structure to accommodate another 16 workers, for a maximum of 56 workers. No fill is required for this application.

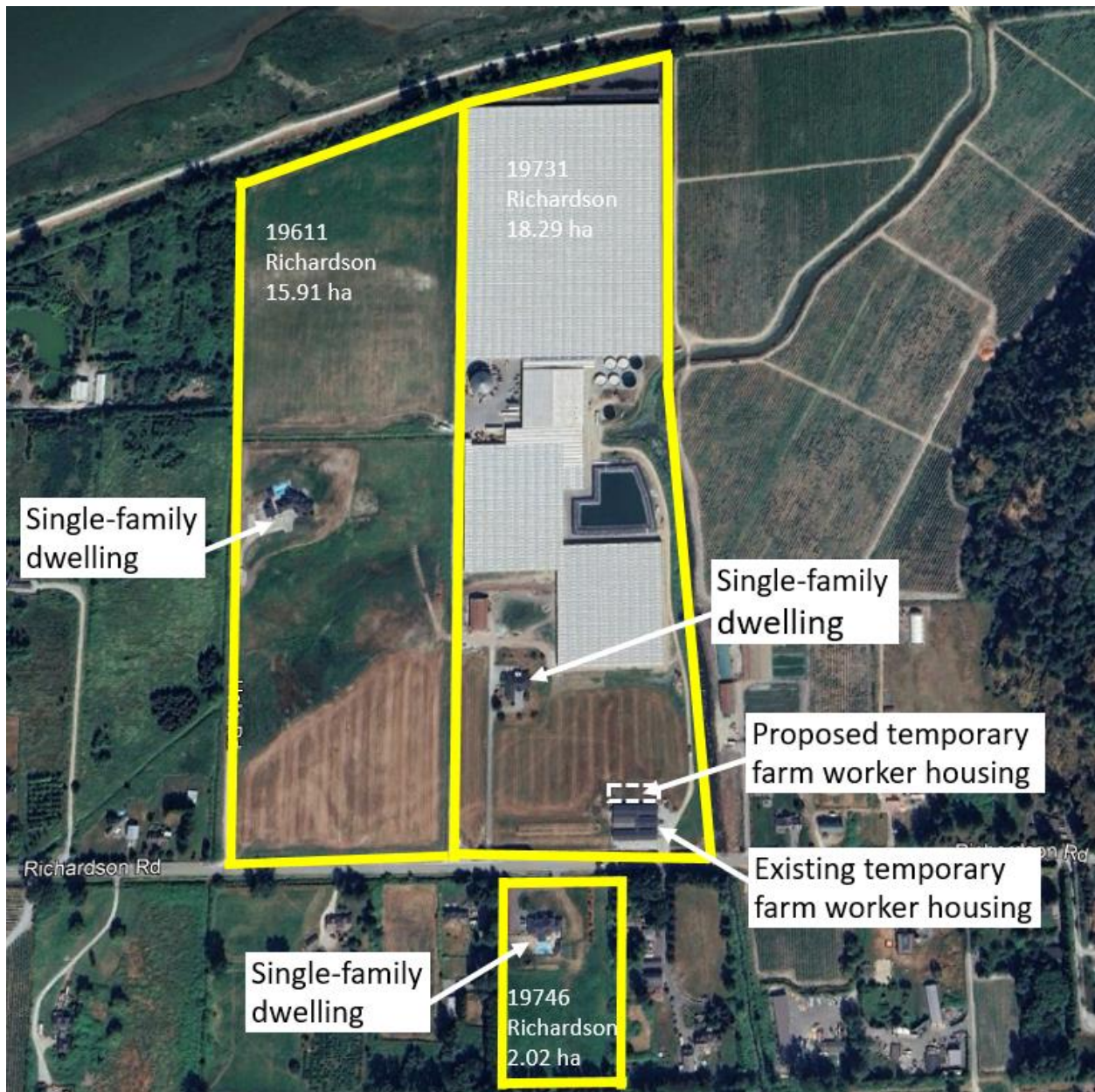


Figure 2: Farm operation and residential uses

**Relevant Policy, Bylaw or Legislation:**

Under the *Agricultural Land Commission Act*, any dwelling unit in addition to one principal residence requires approval from the Agricultural Land Commission (ALC).

The City's Official Community Plan supports seasonal farm labour housing, where approved by the Agricultural Land Commission and subject to the need for such housing supported by a professional agrologist's assessment.

The City's Agricultural Viability Strategy supports temporary farm worker housing to address labour shortages.

The property's A-1 (General Agricultural) zoning permits agriculture and related uses. Farm worker housing is permitted under certain conditions. A housing agreement is required to be registered on title confirming the occupancy of the housing for farm workers only. If the housing ceases to be used by temporary farm workers, then the agreement states it must be removed from the site.

**Analysis:**

The ALC has guidelines for Non-Adhering Residential Use (NARU) applications, found in their Policy L-26<sup>1</sup>. For temporary farm worker housing (TFWH) such as this application, that Policy states:

“The Commission prefers that temporary housing for farm workers, including foreign workers, should be in an existing building, or a residential structure constructed or manufactured to be moved from one place to another, and installed on a temporary foundation with no basement.”

The ALC also has a streamlined application process for temporary farm worker housing where the following criteria is met:

ALC Criteria	Application Details
The parcel where the TFWH is to be located is classified as 'farm' under the <i>BC Assessment Act</i>	All three parcels classified as 'farm'
The minimum size of the farm operation on which the TFWH can be located is 4 ha	36.22 ha
The maximum number of workers requested in each application for a farm operation is limited to no more than: <ul style="list-style-type: none"> <li>• 130 workers for greenhouse, mushroom, tree fruit, and berry/vegetable production</li> <li>• 40 workers for all other commodities</li> </ul>	56 workers proposed for greenhouse
The workers are housed in a temporary residential structure designed to be moved from one place to another	Mobile trailers
Siting and placement of the TFWH minimizes the residential impacts on agricultural land taking into consideration topography, agricultural capability, access, and encourages the clustering of residential structures	TFWH clustered, near road No agricultural land taken out of production
The registration of a restrictive covenant stating that the TFWH will only be used by temporary farm workers and that the owner will remove the TFWH and restore the land to agricultural use if the TFWH is vacant for two consecutive years	On title

**A.** \_\_\_\_\_

<sup>1</sup> [https://www.alc.gov.bc.ca/assets/alc/assets/legislation-and-regulation/policies/alc\\_policy\\_l-26\\_-\\_non-adhering\\_residential\\_use\\_applications.pdf](https://www.alc.gov.bc.ca/assets/alc/assets/legislation-and-regulation/policies/alc_policy_l-26_-_non-adhering_residential_use_applications.pdf)

The receipt of an Irrevocable Letter of Credit (ILOC) sufficient to remove the TFWH provided to the ALC upon approval of the NARU	With ALC
---	----------

The City’s Zoning Bylaw contains a number of regulations for farm worker housing, where it has been approved by the ALC. This proposal complies with those regulations, with the exception of one. Accommodations for temporary farm workers are permitted as follows:

- Maximum of 40 persons per farm operation smaller than 40.5 ha;
- Maximum of 150 persons per farm operation between 40.5 ha and 405 ha; or
- Maximum of 250 persons per farm operation greater 405 ha.

In this case, the farm operation is 36.22 ha and therefore the limit of 40 temporary farm workers applies. However, the applicant is proposing to accommodate 56 workers. If this application is ultimately approved by the ALC, then a future land use application to the City will be required, likely a zoning amendment.

The applicant supplied a report from a professional agrologist (Attachment A), outlining the scope of the farm operation and a detailed agricultural rationale of the necessity to provide farm worker housing on the site.

**Environmental Considerations:**

The proposed housing is located greater than 30 m from the Fenton Slough top-of-bank; therefore, a development permit for riparian area protection is not required.

**Conclusion and Next Steps**

The agrologist report outlines the long-standing and labour-intensive nature of this agricultural business, and notes the building is situated to maintain as much agricultural productivity as possible. Based on this input and the proposal’s alignment with several City policies supporting agriculture and farm worker housing, the suggested motion is for the AAC to recommend Council supports this application.

A NARU application only proceeds to the ALC for review if it receives approval from the local government to be forwarded in the form of an authorizing resolution. Council has the option of:

- Not forwarding the application to the ALC;
- Forwarding the application to the ALC with a recommendation of support;
- Forwarding the application to the ALC with no comment; or
- Forwarding the application to the ALC with a recommendation of no support.

If an application is forwarded to the ALC, the ALC will consider the local government's input but

ultimately, any decision is made by the ALC. Conversely, if Council does not resolve to forward an application to the ALC, then the application does not proceed any further. There is no appeal process to the ALC that an applicant can make in that case.

Finally, should this application be approved by the ALC, it is also recommended that a site-specific amendment to the Zoning Bylaw be supported, to permit greater than 40 workers on the farm operation that is less than 40 ha in size. This would be consistent with the ALC policy for permitting up to 130 workers for greenhouse operations.

---

**KATZIE FIRST NATION CONSIDERATIONS**

Referral     Yes     No

---

**SIGN-OFFS**

**Written by:**

Allison Dominelli,  
Planner

**Reviewed by:**

Colin O’Byrne,  
Manager of Planning

---

**ATTACHMENT(S):**

- A. Agrologist Report