



‘Class B’ Urban Farm Guidelines: Impacts & Recommendations

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I. Background

The City of Vancouver has been discussing how best to support urban agriculture for well over a decade. Urban farming has been included in recent policy documents, including the Vancouver Food Strategy and the Greenest City Action Plan, which describe urban farming as an activity important to achieving the City's economic, social and environmental objectives. The next step in supporting urban agriculture was amending business license and permit requirements to officially recognize urban farming as an allowable activity. After several years of internal work, Development & Building Services, in collaboration with Social Planning and a number of other departments, released the [Urban Farm Guidelines](#) in February 2016.

By March 2016 City Council voted to approve the [Urban Farm Guidelines](#) as a pilot that would last for two growing seasons. There were significant concerns with how challenging it would be for urban farmers to meet the requirements laid out in the guidelines, particularly meeting building code bylaws. However, to avoid delaying the official recognition of urban farming as a legal activity, unanimous support was voiced by City Councilors, food and farming organizations and urban farmers to implement the pilot. Support was contingent on the understanding that monitoring, evaluation and consultation would take place throughout the pilot period.

The [Guidelines](#) create two urban farm classifications: Class A and Class B. Described in **Table 1** below, Class B farms are those that are larger in scale, may be operating in a building or greenhouse and are in industrial, commercial or historical area zones (Chinatown, Gastown and Yaletown). Under the new guidelines Class B farms require a business license and a development permit to operate.

Table 1: Farm classifications enacted as part of the Urban Farm Guidelines

	Urban Farm Class A	Urban Farm Class B
Description	These are smaller scale, integrated into the neighbourhood, likely located in front or backyards and growing in soil	These can be small or large and include a building or greenhouse. They can sell produce from the site, and can be soil or soilless growing.
Zoning district	Residential	Industrial, Commercial and Historical area zones (Chinatown, Gastown & Yaletown)
Size limit – Per parcel	Maximum planting area 325 m ² ^{1*}	Max. planting area 7000 m ² ^{2**}
Size limit – Combined area across all parcels in one business or organization	Max. planting area 7000 m ²	Max. planting area 7000 m ²
Farm sales limits – if leasing land	None	None
Farm sales limits – if owning land	\$9,999/ organization or business	None
Business license	\$10/year	\$136/year
Development permit	Not required if under 326m ²	Required (\$279)
Building permit	Can have accessory building up to 10m ² without requiring a building	If in part or in whole within a building, a building permit is

^{1*} Can be larger if farm is on institutional land and demonstrates strong social impact – can then go to

^{2**} Can be larger if farm demonstrates strong social impact.

	permit	required
Farm gate sales	Only allowed if on institutional land	Allowed

Two groups, the [Vancouver Urban Farming Society](#) and the [Vancouver Food Policy Council](#), were named as being important contributors to the processes of evaluation and consultation. The [Vancouver Food Policy Council](#) (VFPC) was formed in 2004 as a multi-stakeholder council to provide ideas and policy recommendations for how to improve the local food system. The [Vancouver Urban Farming Society](#) (VUFS) is a non-profit society aiming to grow urban farming as a viable, thriving and vibrant sector in Vancouver and beyond. VUFS began as an informal group of urban farmers, entrepreneurs, urban farming supporters, food security advocates, and consumers dedicated to increasing the sustainability of urban farming in Vancouver and throughout BC.

VUFS heard concerns from urban farmers that the costs of permitting and upgrades required to meet building code bylaws were too substantial for their businesses to undertake. To encourage urban farmers to begin the permitting process, City Councilors approved a \$9,000 fund to allow urban farmers to hire building code consultants to help them navigate the process. However, there is concern on the part of farmers and VUFS that these limited funds to cover consultant fees are not adequate to address the substantial upgrade costs that farmers may face.

To better understand the perspectives of urban farmers and the realities of the permitting process, VUFS initiated this research focusing on Class B Urban Farms. The research is being funded in part by the \$9,000 approved by City Council. VUFS, as a voice for urban farmers, did not want to advocate that farmers enter the process until the costs of doing so were more fully understood. This research also furthers the aims of monitoring and evaluation by providing specific feedback on what areas of the Guidelines are negatively impacting the growth and viability of Vancouver's urban farming sector and providing recommendations to create a more enabling environment for urban farming.

The researcher, Shauna MacKinnon, has over a decade of experience working in food sustainability from grassroots organizing to corporate partnerships. She is the author of the most comprehensive research reports to be completed on Canada's organic markets (including BC, Alberta, Ontario, Quebec and national reports). In recent years, she has worked for the Canada Organic Trade Association, in collaboration with the Certified Organic Associations of BC and FarmFolk CityFolk's Seed Security Program. She lives in Vancouver with her family, a large food producing garden and four hens.

II. Methodology

The primary objective of this report is to document the personal experience and perspectives of urban farmers categorized as Class B Urban Farms to more fully understand how the [Urban Farm Guidelines](#) affect them. The research findings are largely based on interviews with urban farmers currently operating businesses that qualify as ‘Class B’ Urban Farms. Two entrepreneurs who put forward applications for urban farm operations that were rejected prior to the 2016 [Guidelines](#) were also included as the permitting process played a role in their decision not to proceed.

Information provided by urban farmers has been aggregated to ensure interviewees can remain anonymous. Given the small number of active Class B Urban Farms and that most of them operate without the required permits and licenses, protecting anonymity is important to not undermine interviewee’s ability to continue to operate their farms. One farm that is named in the document is Solefood Street Farms and its Director, Michael Ableman. Solefood and Ableman are specifically named because they have successfully completed the permit and licensing process. Ableman also made a public statement to City Council when the [Guidelines](#) were passed and some of this information is provided again in these findings. Solefood and Ableman are in a unique position to be publicly identified.

In total, four phone interviews were conducted with currently operating urban and micro farms and one respondent shared experiences from an urban farm application that had been rejected prior to 2016. One active urban farm failed to respond to interview requests. Despite the small number of interviews, the perspectives shared were largely consistent between farmers, with similar comments being shared by all respondents even when individual circumstances varied by operation type.

In addition to farmers’ experiences, background research was conducted on the City of Vancouver permitting process and building code bylaws, the proceedings at the City Council meeting where the [Guidelines](#) were approved were reviewed, and comparative research on other cities’ policies was conducted. Conversations and email correspondence also took place between the researcher and City of Vancouver staff in the Social Planning and Development & Building Services departments.

Thank you to everyone who took the time to share your experiences, concerns and suggestions for improvements.

III. Urban farmer experiences

A. Consultation

Many of Vancouver's urban farmers participated in policy and planning discussions leading up to the introduction of the pilot regulations. Some formally joined the Food Policy Council's working group on the topic, others attended meetings or submitted comments. In general, there was enthusiasm for new Urban Farm Guidelines that recognized urban farms as a part of Vancouver's economy and created a pathway for urban farms to move from a regulatory grey area to legitimize businesses that could better access loans and insurance.

This enthusiasm waned when the Policy Report from the Development & Building department was released on February 9th, 2016. The document, which was set for discussion at a meeting on February 23rd, summarized the benefits of urban farming, but the regulatory recommendations fell short of the support for urban farm businesses that was expected. The Urban Farm Guidelines recommended in the Policy Report were adopted by City Council two weeks later, on March 8, 2016.

From the accounts of urban farmers involved in the process, the discussion within the Food Policy Council working group progressed from dismay about the content of the recommendations to concern that this was their only opportunity to codify the existence of urban farming activities. A full discussion of topics, such as how existing building code bylaws would be applied to urban farm structures (such as high tunnels or retro-fitted shipping containers) and what the associated costs would be, did not take place. These concerns were brought up by one farmer during the final meeting before City Council approval, but time was not made for further discussion.

Urban farmers who participated in the working group expressed that they did not fully understand the extent of the impacts permitting requirements could have given their lack of experience with the development process. There was frustration that this critical topic was not brought up earlier or given space during the consultation phase. While some consultation did take place between the Vancouver Food Policy Council subgroup, the Vancouver Urban Farming Society and City staff, questions have been raised about why more collaboration was not sought to address the significant challenges of applying residential and industrial building codes to agricultural buildings and practices.

Reactions to the Urban Farm Guidelines show the disappointment that the document did not better reflect the needs of affected urban farmers:

"...there is no category in this document that represents us."

"....technologies we would use have not been accounted for so there is no way forward."

“... the engineering and permits required would bankrupt our business.”

Reviewing the proceedings of the March 8th City Council meeting it was clear that the pilot Guidelines were passed with the understanding that monitoring, evaluation and continued consultation would take place throughout the policy period. Near the end of the meeting City staff gave verbal confirmation that they would work in consultation with urban farmers, the Vancouver Food Policy Council and Vancouver Urban Farmers Society. Areas where all parties agreed required more work included how building code bylaws apply to farm structures and ensuring monitoring and evaluation is a collaborative that takes place during the pilot period of two growing seasons. City staff outlined some of the areas they wished to evaluate:

- The number and sizes of farm businesses in the City,
- Evaluating the zones and classes permit and license applications are coming from,
- Looking at issues related to structures and challenges meeting building code bylaws,
- Evaluating the qualitative impacts (number of employees, wages, sales and food production) of urban farms,
- The time it takes to put forward an application and receive permit approvals, and
- Evaluating the time and internal resources required by City staff.

While the Guidelines themselves fail to describe the document as a pilot or offer information on the process going forward, the Council meeting proceedings make intentions clear. Since that time the Vancouver Urban Farming Society joined the Vancouver Food Policy Group’s working group on the issue. A few consultation meetings were set up in spring 2016, but momentum was interrupted by the inability of farmers to participate over the summer (their busiest time of year). The next meeting will likely be held in February 2017.

The Social Planning department confirmed that during the first growing season of the pilot no urban farms have come forward to initiate the permit or licensing process. No farmers have accessed the \$9,000 fund for building code consultants. The two urban farms that obtained business licenses and development permits prior to the release of the Guidelines remain the only licensed operations. Social planning is currently supporting an update to the Vancouver Urban Farming Census (first published in 2012), which will help meet their evaluation goals.

B. Inconsistency between policy intent & guideline impacts

“The Greenest City Action Plan and the Vancouver Food Strategy identify urban farms as key food assets that contribute to sustainable food systems in Vancouver. Urban farming contributes to Council priorities related to green jobs, health and wellness, food access, environmental sustainability, and compact communities.

These include:

- *Greenest City 2020 Action Plan: Tracks urban farms as a key metric to achieving the City’s local food goal of increasing local food assets by 50% by*

the year 2020.

- *Vancouver Food Strategy: Sets out five goals, including the identification of urban farming as a priority action area that can enhance Vancouver's green economy.*
- *Healthy City Strategy: Identifies a healthy, just and sustainable food system as one of the 13 building blocks of a healthy city for all.*
- *Vancouver Economic Action Strategy: Urban farms contribute to the local economy and create green food jobs by providing opportunities for food businesses and supplying food to consumers.*
- *Transportation 2040 Plan: Supports local food production and distribution to reduce the need for large scale and long distance transport.*
- *Food Waste Targets: Supports meeting food waste diversion targets by minimizing food wastage due to long food supply chains."*

Excerpt from the Urban Farming Guidelines Report (2016, p. 3).

The excerpt above demonstrates through consistent policy decisions that the City of Vancouver views urban agriculture as a beneficial practice that can help the City work towards its economic, social and environmental objectives. In November 2015, City Council adopted the Greenest City Action Plan, Part 2 2015-2020, that identifies **Action 7.1:** to adopt and implement an urban farming policy to further enable commercial food production in the city and increase the number of urban farming businesses from 18 to 35.

Given this explicit policy support for growing the Vancouver urban farming sector, respondents felt greatly let down by the content of the Urban Farm Guidelines. Multiple farmers characterized the Guidelines as, "straight out of the legal department." There was broad criticism of the emphasis on avoiding tax loopholes and restrictions on urban farm operations' activities (such as farm size, work hours or production types) without a counterbalance of guidelines that supported the viability of urban farms.

A significant portion of the Urban Farm Guidelines lay out restrictions to prevent urban farms from claiming "Farm Class Regulation" (described in [Section 23 of the Assessment Act and B.C. Reg. 411/95, the Classification of Land as a Farm Regulation](#)). The Farm Class Regulation was put in place in 1995 as a tax incentive to encourage agricultural activity by lowering operating costs for farmers and providing an incentive for landowners who are not farming to lease their land for agricultural purposes. Farm Class Regulation remains as one of the few pieces of regulation in place to encourage agricultural activity on high value land in Metro Vancouver municipalities and elsewhere in BC ([Metro Vancouver 2014](#)).

C. Limitations on urban farming's economic viability

All the interviewees stated that one of their top concerns about the Urban Farming Guidelines are

limitations that diminish the economic viability of Class B Urban Farms. All agriculture production operates on narrow margins and urban agriculture needs to compete with production in peri-urban and rural areas as well as imported products. There are numerous strategies to make urban farming economically competitive and to deliver on the job creation, social and environmental benefits that urban farming can offer. However, when some of these strategies are limited by bylaw restrictions the options for urban farm businesses become limited.

Many interviewees stated that the risks to the economic viability of their businesses were real: meeting the full requirements set out in the pilot guidelines would cause their businesses to fail. Others invested the time and money to attain the required permits, upgrades, assessments and licenses, but needed to finance this investment at great expense.

Multiple business licenses for separate sites

2.1 – Regulations for all urban farms

(i) Urban farm operators must obtain an urban farming business license prior to use of the site. All urban farm sites require a separate and individual business license;

Due to the limited availability and size of urban land, more than one site is often necessary to reach an economically viable scale. Requiring a separate business license for each farm site adds an extra expense and requires extra time from the urban farm operator.

Limits on high value products

2.1 – Regulations for all urban farms

(v) Urban farms are to cultivate only fruits or vegetables.

One of the strategies to improve the economic viability of food production is to focus on high value products. There are successful urban farm models operating elsewhere in North America that integrate fish and vegetable production using aquaponic systems. Aquaponic systems are particularly well suited for urban farming: fish and plants can be raised in a closed loop system on a small footprint, the fish waste provides nutrients needed to grow plants without the need to bring fertilizers or compost from offsite, and fish (as a protein) are a higher value product than fruits or vegetables so they bring a stronger economic return. Other food products being grown for commercial sale in North American cities include honey, egg, mushrooms and flowers.

The Urban Farm Guidelines as written do not allow for flexibility or innovation in product types. As one interviewee put it, “they pigeon hole a grower into standard horticultural practices, which are not economically feasible.” Allowing for greater diversity in production allows for higher return opportunities and can also be a part of sustainable production. Flowers, for example, may be grown alongside food crops as part of a pest control or soil building strategy. Under the pilot Guidelines operators could not sell flowers they have grown.

Limits on growing area

2.1 – Class B regulations

(i) The planting area for a single parcel or the combined planting area for all parcels operated jointly, may not exceed 7000 m², unless relaxed by the Director of Planning due to unnecessary hardship associated with the location, shape or size of the parcel or parcels;

Scaling up is one of the most common strategies for any business to increase its economic viability. Outdoor farms, which use production practices that are less intense than indoor growing systems, are competing in the market with peri-urban and rural farms that operate on multiple acreages. Limiting the size of Class B Urban Farms, or requiring an additional layer of approvals, reduces their ability to farm at a scale where enough production efficiencies can be realized to be profitable. This acts as a disincentive for urban farms to grow, increase sales and increase employment opportunities.

At the City Council meeting when the Urban Farm Guidelines were approved Councilors expressed their support for making exceptions for social ventures that help the City meet economic, social and environmental objectives. This desire to provide exemptions for social ventures is not reflected in the wording of the pilot Guidelines.

Limits on hours of operation

2.2 – Business license

(ii) For Class B, if located within 30 m of a residence, no activities may take place outside the hours of 8am to 9pm;

To get the freshest possible product to market it is common for farmers to harvest in the morning prior to delivery or farmers' market hours. This requires starting the work day much earlier than 8am. Other tasks, such as watering, weeding and seeding, may also take place in the early morning to avoid the direct heat of the day and to take advantage of long daylight hours during the peak growing season. Limiting the hours of operation of urban farms puts them at a disadvantage compared to periurban or rural farms who do not face these restrictions. Limits on the use of noisy equipment during certain hours would address the needs of residential neighbours while allowing Class B Urban Farms to have more flexibility for scheduling agricultural tasks and avoiding the need for additional labour to fit necessary work within the Urban Farm Guideline's prescribed hours.

Cost of infrastructure upgrades

2.4 – Greenhouses & other structures

(ii) Greenhouses or other structures that are part of an Urban Farm Class B are required to meet standards in Vancouver Building By-law.

The cost of upgrading agricultural infrastructure to meet building code bylaws designed for permanent residential or commercial buildings is the largest barrier keeping urban farms from entering the permitting process. The costs are perceived to be much greater than what the \$9,000

fund to support urban farmers' permitting process can adequately address. This perception has largely been shaped by the experience of Solefood Street Farms, the first urban farm to go through the permitting process and meet Building by-law.

Solefood is a social venture operating an outdoor farm on multiple vacant urban lots. The infrastructure required to run the social venture successfully includes raised beds and containers to farm safely on contaminated or paved land, sheds to secure tools and supplies from theft, and tunnel houses to extend the production season. They began the permitting process eight years ago at the request of one of their funders. Solefood Director, Michael Ableman, shared the challenges they faced meeting by-laws at the March 8th City Council meeting, stating:

“Solefood spent well over \$100,000 in the last four to five years on structural engineers, environmental consultants, contractors, permit fees, etc. solely to fulfill building permit requirements that were never written to address the types of structures or uses farms represent.”

Upgrades requested by city inspectors included 3-foot-long steel pilings set in concrete costing \$30,000 to ensure Solefood's sheds (which are former shipping containers) would remain anchored to the ground in case of an earthquake. When inspectors looked at their tunnel houses—structures functioning as a greenhouse but only consisting of a steel frame covered with 6-millimetre thick plastic—they requested to see where the fire exits were. The tunnel “walls” are thin plastic, they can easily be broken through anywhere along the structure.

The type of expensive upgrades that Solefood had to undertake exemplify the disconnect between building code bylaws and the realities of urban farm infrastructure. This example has become an urban farm legend, every other interviewee cited the substantial expenses Solefood had to pay as a reason why their businesses could not viably meet building code bylaws.

A micro farm operating in a retro-fitted shipping container in conjunction with a restaurant that went through the permitting process expressed similar concerns about the expense of upgrades. They received funding support from Vancity Credit Union and political support from within the City, which enabled them to complete the process. Upgrades required to meet building code bylaws included seismic upgrades (10 foot steel anchors set in concrete costing an estimated \$2,500) and a new roof design. Building inspectors requested that they install a sprinkler system for fire safety, but they were able to avoid this expense with support from an advocate within the City management. Even without the sprinkler system the total cost of permits and upgrades came to \$7,000 more than the initial estimate of \$22,000 to purchase the unit and make it operational. In addition to the costs incurred, the proprietor spent many hours applying for and meeting about the permits and upgrade requests.

In this case the company is very committed to sustainability and the concept of operating an urban farm for educational purposes, this is what kept them committed to the process despite the frustration and costs. However, from their experience they believe it is not feasible for other businesses to follow the same model. Without external funding support, an internal advocate and

substantial resolve, the return on investment for the micro-farm is too low. Reinforcing their point, there have been no new micro-farms in shipping containers integrated into restaurant operations in the City of Vancouver. The company that sold them the micro farm has also shifted their business model to exclude food production in part because of the expense and challenges presented by the permit and building code bylaw processes.

It is worth noting that other North American cities, such as the [City of Boston](#), have developed building code bylaws specifically for urban food production in retrofitted shipping containers. Innovative uses for shipping containers has been on the rise as they can only be used for roughly five years in the shipping industry before being retired. This creates a surplus of containers that can be acquired cheaply and retrofitted for other purposes. Urban farmers are using shipping containers as a low cost and sustainable alternative to other building types. Requiring expensive upgrades to the containers undermines this model and makes it unfeasible to use them for food production in the City of Vancouver.

One of Ableman's statements to City Council summed up the perspectives of many interviewees, "If a simple tunnel house (steel frame covered with 6 mil plastic) or a shipping container to secure tools, etc. will continue to be placed under the same building codes as a bricks and mortar building that sells auto parts or computers, it will become prohibitive for any farm to operate in the city."

Other similar statements from interviewees included:

"If a Class B Urban Farm is on industrially zoned land they need to meet the safety requirements demanded of industrial production. That is not feasible, or necessary, to grow food."

"The risk [of seeking permits] is very high low and pay-off is extremely low."

Even though many urban farmers had not sought out development permits in fear of costly upgrades, they were conscientious about meeting code for electrical, plumbing and fire exits. Safety was important, the concern was with the need to hire engineers, architects or consultants and then complete upgrades that did not add value to their core business and seemed inappropriate or excessive. Seismic upgrades and sprinkler systems were referenced specifically by a number of interviewees as the type of upgrades that were not financially feasible for their business.

D. Impacts on leases & relationships with landlords

All the interviewees, and all the active Class B Urban Farms we are aware of, operate on land they do not own. Farmers have rental, lease or handshake agreements that allow them to operate. The Urban Farm Guidelines have an impact on the tenant-landlord relationship for both indoor and outdoor farms.

Indoor farms had concerns about starting the development permit process and potentially setting

off a series of complications for their landlords. Some were also concerned that not being to code, which could come to light if they started the process but could not afford all required upgrades, could create distrust with their landlord and jeopardize their lease agreement. While many interviewees had hoped the Urban Farm Guidelines would bring more stability to their business, a sense of vulnerability remained because they feared their businesses could not afford to be fully legitimate.

The comment was also made that an indoor urban farm located on agricultural land would not face the same concerns. Jurisdictions such as Burnaby, Richmond and Southlands would be better areas to relocate urban farm businesses because bylaws already exist that meet the needs of agricultural businesses. Lease agreements and other aspects of the business would then be more straightforward, affordable and secure.

The impact of the Urban Farm Guidelines on tenancy relationships is most negatively felt by outdoor Class B urban farms. Outdoor urban farms typically operate on vacant land held by private landowners. One of the biggest incentives for private landowners to allow agriculture to take place on their land is property tax reductions. While the Urban Farm Guidelines do not explicitly say property tax reductions will be eliminated for Class B urban farms, they set out numerous restrictions that suggest the City would like to eliminate these tax breaks.

Currently there is only one Class B Urban Farm that is following the outdoor farm model, the social venture Solefood Street Farms. Along with producing food in the city limits Solefood is delivering substantial social benefits: they train and employ close to 30 people most of whom are managing some form of long term addiction and mental illness, they produce an average of 50,000 lbs. of food annually, of which close to 10,000 lbs. is donated to Downtown Eastside agencies. They have paid out close to one and a half million dollars in wages and salaries to staff. A 2013 study by Queens University assessed that for every dollar paid to staff, there is a \$2.20 savings to the health care, legal, and social assistance systems and to the environment. The language in the Urban Farm Guidelines suggesting tax incentives could disappear “puts a cloud over landowners that would be sympathetic” to supporting social ventures such as Solefood. This puts Solefood in a challenging position, they are not only dependent on new leases to grow their production, they also need new leases as current sites are developed by landowners. Solefood has been held up again and again by the City as an example of green innovation and socially responsible business, so it came as a surprise that the foundation of the model they have built their success on would be undermined in the pilot guidelines.

E. Long term impact on urban agriculture in Vancouver

To assess the effectiveness of the Urban Farm Guidelines how they impact today’s urban farms needs to be considered alongside how they impact the long-term growth and development of Vancouver’s urban farming sector. Concerns raised by interviewees included:

- The Guidelines create a document that institutionalizes policy and process that is not supportive of urban agriculture. Under the current leadership there is still support at the higher policy level, but when governments change and priorities

- shift, this makes urban farming very vulnerable.
- Urban farms are primarily small businesses operating on low margins. They do not have the money to put toward permitting processes, paying for architects and undertaking expensive upgrades. If I was starting a business now I would not start an urban farm in Vancouver because the economics do not make sense under these Guidelines.
 - One of the hopes for the Guidelines was that they would provide a way for urban farms to become legitimate businesses in Vancouver. With the expenses related to permitting and licensing some urban farm businesses have not been able to go through the process. Because of this they cannot sell their business. It eliminates the long-term value of building a business and makes succession planning difficult.

F. Support for improvements & collaboration

Despite the concerns outlined above, Vancouver urban farmers (and potential urban farmers) are interested in participating in any process to improve the Guidelines. There is keen interest in collaborating with City departments on the development of bylaws and building codes that are appropriate for urban food production.

“Those of us on the ground doing this work are in a unique position to provide input into the process and we appreciate any opportunity to do that.”

It came up in every interview that there is a lack of agricultural knowledge within the City when it comes to production practices, technology and innovation, and what it takes to run a successful farm business. There is a desire to make the objectives outlined in the Greenest City Action plan a reality in Vancouver, but achieving those objectives requires people willing (and able) to do the hard work on the ground.

We, “need to be able to have real conversations with those who are making policy decisions on our behalf, we need to work together to integrate the vision of the Greenest City Action plan with the reality of what it takes to really do this work. Regulation, fees, and enforcement need to be balanced with collaboration, support, and conversation.”

III. Permits and licenses: Potential costs

One of the key outcomes of the Urban Farm Guidelines was the creation of a business licence category for urban farming, which would allow the urban farm to grow and sell produce. To align with Council priorities the business license fee has been kept at a minimal cost. An Urban Farm - Class A license is \$10 and an Urban Farm - Class B license is \$136. If a farming business is operating and using multiple sites, the farming business will need to obtain a licence for each of the sites in operation.

The business license fee is low and follows a straightforward process, however, before the license can be granted urban farms need to have all required permits approved. This is where things become more complicated and less transparent. An [Urban Farm Checklist](#) has been developed to guide urban farmers through the application process, but it lacks some of the important detail urban farmers are looking for—which permits are required for their type of operation, what are the costs of the permits and what upgrades will be required. **Table 2** below begins to layout the potential permits and costs urban farms may encounter. The information is based on the experience of urban farmers who have gone through the permitting process and information from Development & Building Services.

Table 2: Potential permits and costs for Class B Urban Farms by operation type

Structure type	Potential permits & requirements	Sample costs
Indoor farm in warehouse	<ul style="list-style-type: none"> - Preparation of site plan/drawings - Change of use permit (includes neighbour notification & 2 week comment period) - Electrical permit - Plumbing permit - Sprinkler system permit - Sprinkler system installation - Business license 	<ul style="list-style-type: none"> - can do yourself - \$600 - \$4,800* - \$63 - \$12,000* - \$169 & up* - \$599 - & up* - \$2 - \$7/ ft^{2**} - \$136
Indoor farm in shipping container	<ul style="list-style-type: none"> - Preparation of site plan/drawings - Development permit - Structural engineer report - Seismic upgrades - Changes to roof structure - Electrical permit - Plumbing permit - Sprinkler system permit - Sprinkler system installation - Business license 	<ul style="list-style-type: none"> - can do yourself - \$279 - ~\$800 - ~\$2,500/container*** - ~\$2,500 - \$63 - \$12,000* - \$169 & up* - \$599 - & up* - \$2 - \$7/ ft^{2**} - \$136
Outdoor farm – raised beds or containers	<ul style="list-style-type: none"> - File research on environmental contamination - Potential site contamination/remediation assessment - Business license for each site 	<ul style="list-style-type: none"> - \$224 - \$30,000-\$40,000 - \$136/site

Outdoor farm – hoop house, high tunnel or greenhouse	-Development permit -Upgrades to meet all building code by-laws (fire safety, seismic, accessibility)	- \$279 - depends on requirements
Outdoor farm - shed	-Development permit -Upgrades to meet all building code by-laws (fire safety, seismic, accessibility)	- \$279 - \$2,500+/structure can be up to \$30,000*** for large operation w multiple sites/sheds
Rooftop farm	- Change of use permit - Development permit - Electrical permit - Plumbing permit - Structural engineer report - Possible seismic upgrades - Business license	- \$600 - \$4,800 [*] - \$279 - \$63 - \$12,000 [*] - \$169 & up [*] - ~\$800 - ~\$5,000+ - \$136/site
Structure/plan considered an “alternative solution” to building code bylaws	- Plans developed by an architect or engineer - Review of plans & documents by City staff - Review by the alternative solutions review panel	- ~\$500 & up - \$400 - 800 - \$2,280

*permit fee depends on square footage, scale of work or cost of work

**estimate provided by Vancouver company. Sprinkler requirement may impact other businesses on site or property owner.

***based on experience of permitted urban farms in Vancouver

During the pilot period development permits are time limited to one year. Once the above permits are submitted and approved a new application would need to be submitted the following year. All business licenses need to be renewed each year.

IV. RECOMMENDATIONS

Despite concerns, the [Urban Farm Guidelines](#) pilot offer an opportunity to be a stepping stone to something better. There is a desire by urban farmers and City staff to collaborate and continue to improve the process. Conversations with urban farmers, the Vancouver Urban Farming Society and City staff highlighted several starting points for improvements that could better support the spirit of the Greenest City Initiative and grow urban farming in Vancouver.

Begin with an understanding that food production is a low margin industry. Acknowledge the type of urban farms that make up the fabric of Vancouver’s urban farming sector and their broader contributions.

Any recommendations for how best to move forward need to be grounded in the economic realities of agriculture: farmers, rural or urban, operate on thin margins. Economic viability is paramount for an urban farming sector to develop. An enabling regulatory environment, which is already supported by enabling policy in the Greenest City Initiative, means regulation that does not undermine the economic viability of urban farmers. The examples of highly capitalized food production systems are rare anywhere in North America. The urban farming sector in Vancouver is primarily made up of small businesses and social ventures that have an economic value as well as bringing social, educational and environmental benefits to the City. Viewed through this lens, a more supportive regulatory framework can be warranted.

Through the research process many ideas and suggestions were shared on how to make a more enabling environment for urban farming. These have been organized into four areas of focus.

1. Work with Building & Development Services and building code bylaw staff to develop bylaws appropriate to farm infrastructure, including greenhouses, hoopouses and retro-fitted shipping containers.

Urban farmers expressed frustration with a lack of agricultural knowledge within the City, one of the areas this is expressed in is the application of existing building code bylaws to farm structures. The design, function and necessary efficiencies of farm structures differs from other urban buildings. Urban farmers unanimously stated they are willing to work with Building and Development Services and other City departments to develop building code bylaws and practices that address safety and liability issues while also accommodating the operational and business needs of urban farms. City of Vancouver staff also noted, during the March 8th Council meeting, that building code bylaws are an important part of urban farm guidelines that had not yet been addressed.

In keeping with the commitment to continue to collaborate with the urban farming community during the pilot period, the process of developing building code by-laws for urban farm structures should be taking place now. The experience of the few farms that have gone through permitting and upgrades is enough to provide a starting point to discuss changes needed. Some of the solutions may be achieved using the City’s allowance for “Alternative Solutions”. This category requires architectural or engineering support, which could be facilitated through an

urban farm building code bylaw working group. The timeline below outlines recommended steps and outcomes for developing building code bylaws for urban farm structures.

2. Collaboratively develop tax or other incentives to encourage urban farming and codify these in the post-pilot phase of the Urban Farming Guidelines.

Urban farmers felt that the emphasis on preventing loss of tax revenues in the Guidelines far outweighed any incentives for urban food production. Further consultation and policy analysis should be focused on the taxation issue; the balance can be tipped towards supporting urban farming without losing all financial safeguards.

The City of Vancouver has a history of using creative planning and policy tools to secure social benefits for the city—[Community Amenity Contributions](#) (CACs), in-kind or cash contributions provided by property developers when City Council grants development rights through rezoning, are one example. CACs are used to build and expand public amenities such as park space, libraries, childcare facilities, community centres and transportation services; facilities that serve the public good and further the City's social and environmental objectives, but cannot be achieved without incentives or public funding.

The urban farm and social venture Solefood provides a test case for the economic, social and environmental benefits that an urban farm can provide. Attempting to develop guidelines that allow ventures like Solefood to secure land to farm through tax incentives for landowners would allow these benefits to continue to flourish. Blocking tax incentives will undermine and eventually end this type of socially beneficial model. Building on Solefood's experience and current approaches used to secure public amenities, a consultative process that includes Solefood Street Farms, Fresh Roots Society, VUFS and relevant City departments (Social Planning, Finance and Legal), should be initiated to develop mutually agreeable solutions. Again, this process should begin before the Urban Farm Guideline pilot period comes to an end. This would allow new, more enabling guidelines to come into effect in 2018.

3. The City can lead the way by investing in urban farm infrastructure and including urban agriculture in model developments.

Given the expense of upgrades to meet building code bylaws and development restrictions faced by both Class and Class B urban farmers, a recommendation that surfaced in numerous interviews was for the City to take a more proactive role in making a space for agriculture infrastructure. This could take the form of the City funding and building a greenhouse on City land that would then be leased to urban farmers or including space for shipping container farms in City-backed development projects. Investing in and making space for agriculture infrastructure would create a community asset that would assist urban farm start-ups during their early phases and perhaps beyond.

Other municipalities have applied a similar approach by leasing City land to new farmers (on incubator plots) or established farmers (with long term leases). These approaches recognize that farming provides a public benefit and the enterprise of farming is not always economically

feasible in urban or peri-urban areas. The City of Vancouver has recognized the benefits of urban farming in the Greenest City Action Plan, but further investments are needed to achieve the goals of urban farm growth.

4. Continue to look to other cities as examples.

Urban farming and associated policies and processes continue to develop in cities around the world. There are many cities that have urban farming guidelines, zoning and permitting requirements in place that Vancouver can look to as a model. These policies can be used as a starting point for gaps in Vancouver's building codes (such as [Boston's guidelines for retrofitted shipping containers](#)), as a test case for how more permissive policies play out (such as [Victoria's policy allowing the sale of flowers, eggs and honey](#)) and to use as a benchmark for how well the City is supporting urban farming. Existing urban farming guidelines that offer useful comparisons include:

- City of Boston Urban Agriculture Re-Zoning [Article 89](#) and [Article 89 Made Easy](#)
- City of Victoria [Schedule L - Small Scale Commercial Urban Food Production Regulations](#)
- City of Seattle [Municipal Code for Urban Farms and Community Gardens](#)