Agricultural Impact Assessment

2809 Townline Road
Township of Puslinch

PREPARED FOR:
Fieldgate Properties Ltd.

February 05, 2026

Your Vision

Designed | Planned | Realized

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MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

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1.0 Introduction

1.1 Overview

MacNaughton Hermsen Britton Clarkson Planning Limited (hereinafter "MHBC") has been retained by Fieldgate Properties Limited hereinafter (the 'Client') to complete an Agricultural Impact Assessment (AIA) for a proposed Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for the property at 2809 Townline Road in the Township of Puslinch. These applications aim to permit the development of industrial and limited commercial buildings on the subject lands. The AIA was requested by the County of Wellington in order to deem the planning applications 'complete' under the Planning Act.

The subject lands comprise approximately 33 hectares (81.5 acres), featuring 780 metres of frontage on Townline Road and 400 metres of frontage on Ellis Road, forming a generally rectangular parcel. The lands are situated at the northeast corner of the Highway 401 and Townline Road interchange, directly adjacent to the settlement area of the City of Cambridge (**Figure 1**).

Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications were submitted to the County of Wellington on November 19, 2025. The applications seek to permit the development of an industrial centre consisting of six industrial buildings and a large-format retail store with a gas bar (Site Plan A), or alternatively, eight industrial buildings with no retail component (Site Plan B) – see **Appendix D**.

This report has been prepared to support the Official Plan Amendment to determine consistency with the Provincial Planning Statement 2024 (PPS) policies and follows the Ontario Agricultural Impact Assessment Guidance Document released in January 2026 by the Ministry of Agriculture, Food and Agribusiness (OMAFA).

1.2 Data Collection and Review

In preparing this Report, the following background materials were reviewed:

- Provincial Planning Statement (2024);
- County of Wellington Official Plan;
- Township of Puslinch Zoning By-law No.023-18; and,
- Agricultural Impact Assessment (AIA) Guidance Document (2026) by OMAFA.

In addition to the plans and reports that were specifically prepared in support of the application, the following materials were also reviewed:

- Site Plans;
- 2021, 2016, and 2011 Census of Agriculture and OMAFA's Ontario business, agri-food, and farm data profile for the County of Wellington and Township of Puslinch;

- Soil data resource information including the provincial digital soil resource database, Canada Land Inventory Agricultural Capability mapping, Soil Suitability information and mapping (for specialty crops), and information from on-site investigations;
- Crop heat units data from Agronomy Guide for Field Crops – Publication 811 (June 2009);
- Aerial photography (historic and recent) with effective user scale of 1:10,000 or smaller;
- Agriculture and Agri-Foods Canada (AAFC) Annual Crop Inventory (2023);
- Agricultural Systems Portal (OMAFA);
- AgMaps Application (OMAFA);
- Make a Map: Natural Heritage Areas Application (Ministry of Natural Resources); and
- Minimum Distance Separation (MDS) Document Publication 853 (OMAFA).

A land use survey was also conducted on November 4th, 2025, with additional information gathered from Google Satellite Imagery and AAFC's 2023 Annual Crop Inventory to gain a better understanding of the agricultural operations and activities in both the primary and secondary study areas. A summary of the land use survey is provided in Section 2.2 of this Report and illustrated on **Figure 2**. The potential for impacts will vary and mitigation is dependent on the type and sensitivity of the agricultural activities identified in the primary and secondary study areas.

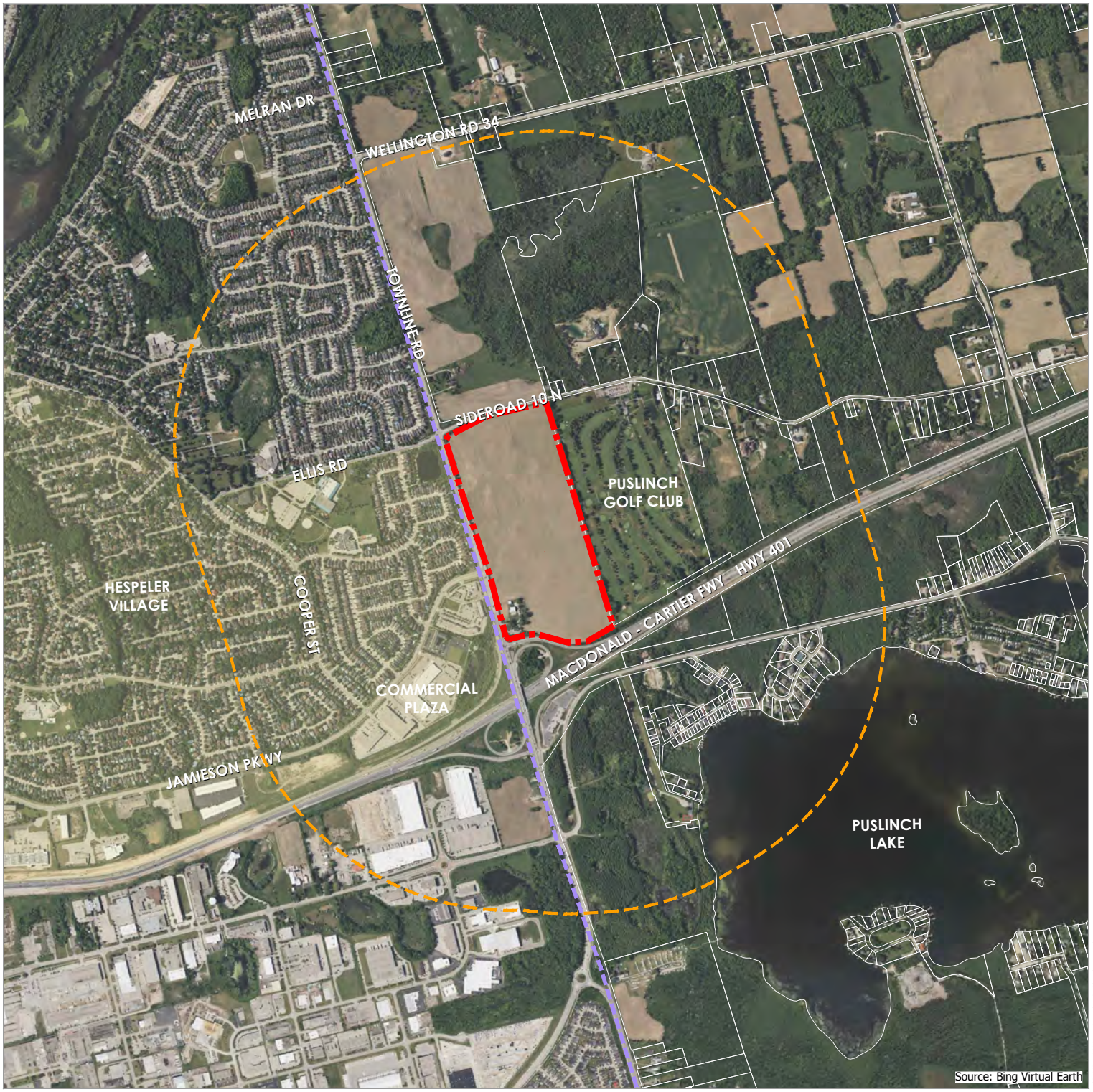


Figure 1 - Location Map

- Primary Study Area
- Secondary Study Area (1000m buffer)
- Region of Waterloo Boundary
- Hespeler Village

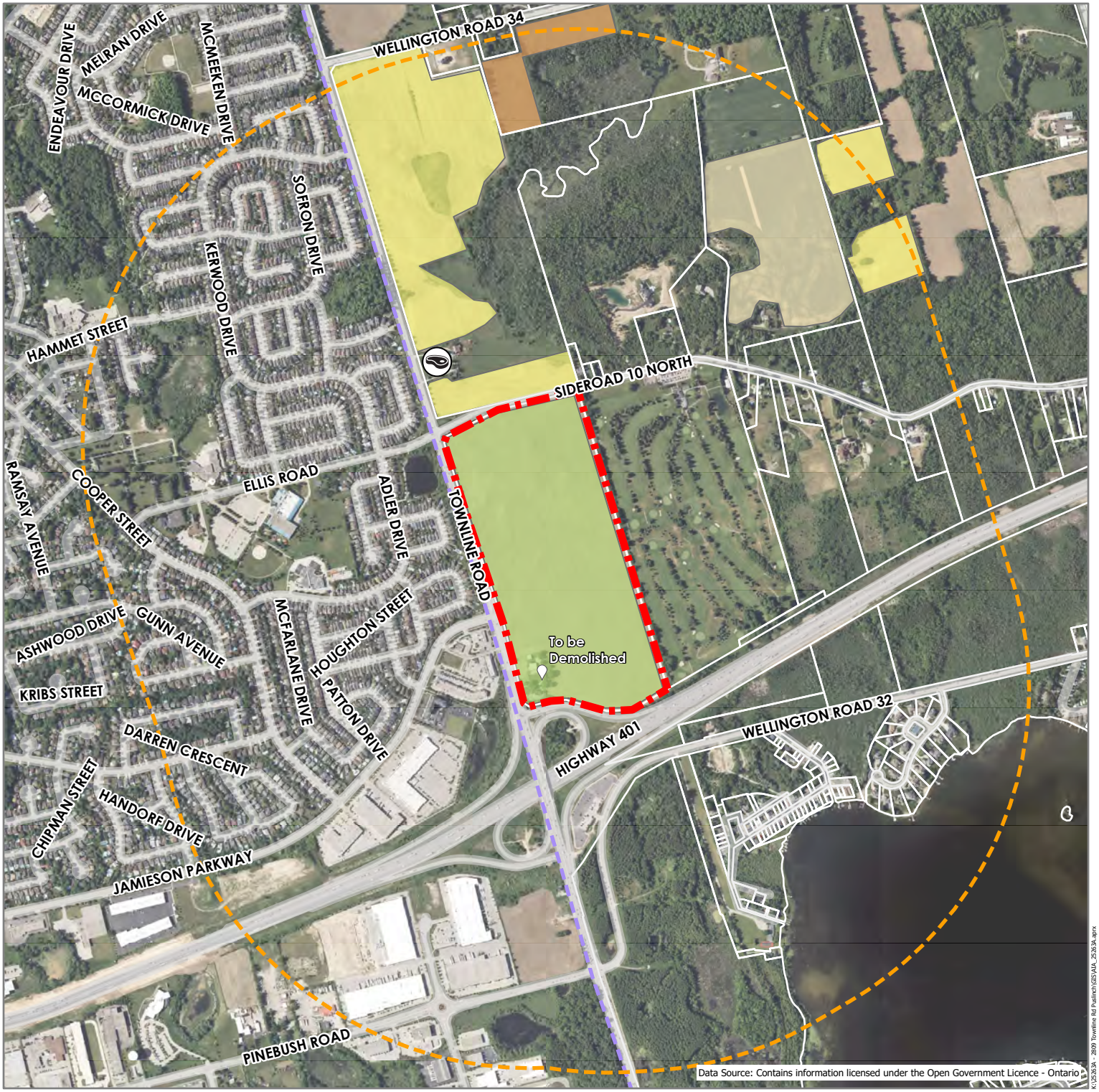


Figure 2 - Agricultural Land Use

- Primary Study Area
- Beef cattle ranching and farming, including feedlots
- Region of Waterloo Boundary
- Secondary Study Area (1000m buffer)
- Corn farming
- Fallow
- Hay farming
- Winter Wheat farming

1.3 Planning Policy Framework

Several key documents were reviewed as part of this AIA to provide a comprehensive assessment of the policy framework from an agricultural perspective regarding the proposed OPA and ZBA. The following is a review of the land use policy framework related to the subject lands.

1.3.1 Provincial Planning Statement, 2024

The Provincial Planning Statement (PPS) 2024 took effect on October 20th, 2024. The new PPS replaces the 2020 Growth Plan and 2020 Provincial Policy Statement.

The PPS 2024 establishes the policy foundation for regulating the development and use of land in the province and provides policy direction on matters of provincial interest related to land use planning and development. It provides a vision for land use planning in Ontario that encourages an efficient use of land, resources and public investment in infrastructure. The PPS strongly encourages development that will provide long-term prosperity, environmental health and social wellbeing. This section provides an analysis of the PPS with respect to the request to bring the lands within a Rural Industrial Area designation.

The PPS defines 'Rural Areas' as:

> "*means a system of lands within municipalities that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and resource areas.*"

Policy 2.5 of the PPS provides policy direction to 'Rural Areas'. Although the policies do direct future growth and development to rural settlements, planning authorities are to *"give consideration to locally appropriate rural characteristics, the scale of development and the provision of appropriate service levels." (Policy 2.5.3).* Furthermore, in accordance with the PPS, growth and development may be directed to "rural lands" in accordance with policy 2.6 of the PPS.

Rural lands are defined as:

> *"means lands which are located outside settlement areas and which are outside prime agricultural areas."*

The PPS defines "Prime agricultural areas" as:

> "*areas where prime agricultural lands predominate. This includes areas of prime agricultural lands in associated Canada Land Inventory Class 4 through 7 Lands, and additional areas where there is a local concentration of farms which exhibit characteristics of ongoing agriculture. Prime agricultural areas may be identified by the Ontario Ministry of Agriculture and Food using guidelines developed by the Province as amended from time to time. A prime agricultural area may also be identified through an alternative agricultural land evaluation system approved by the Province.*"

Further, the PPS defines Prime agricultural land as:

> *"specialty crop areas and / or Canada Land Inventory Class 1, 2 and 3 lands, as amended from time to time, in this order of priority for protection."*

The PPS also defines specialty crop areas as:

"*areas designated using guidelines developed by the province, as amended from time to time. In these areas, specialty crops are the predominantly grown, such as tender fruits (peaches, cherries, and plums), grapes, other fruit crops, vegetable crops, greenhouse crops, and crops from agriculturally developed organic soil, usually resulting from:*

a) *Soils that have suitability to produce specialty crops, or lands that are subject to special climatic conditions, or a combination of both;*

b) *Farmers skilled in the production of specialty crops; and*

c) *A long-term investment of capital in areas such as crops, drainage, infrastructure and related facilities and services to produce, store, or process specialty crops."*

The subject lands and surrounding areas have not been identified or designated as a specialty crop area by the Province, County, and Township nor do the lands exhibit characteristics of a specialty crop production as defined by the PPS. Accordingly, the subject lands are not within a specialty crop area.

Based on a review of Canada Land Inventory mapping (**Figure 3**), the subject lands contain Class 2, 3, and 5 soils and, as such, may meet the PPS definition of prime agricultural lands. Although the lands may be considered prime agricultural lands as per the PPS, the lands are designated Secondary Agricultural per the County of Wellington Official Plan. This designation is not considered to be a Prime Agricultural designation, and as such these lands are considered 'Rural Lands". Accordingly, the policies of Section 4.3.2 through to 4.3.5.1, inclusive, of the PPS do not apply these applications.

This Agricultural Impact Assessment does, however, fulfil the requirement provided in Policy 4.3.5.2 of the PPS, that states:

"*Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance*".

It is further noted that Policy 4.3.1 of the PPS requires planning authorities to use an agricultural systems approach, based on provincial guidance, to maintain and enhance a geographical continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.

An agricultural system is defined in the PPS as follows and essentially is comprised of the land resource (i.e. the soils) and the infrastructure that supports agri-food network:

"means a system comprised of a group of inter-connected elements that collectively create a viable, thriving agri-food sector. It has two components:

An agricultural land base comprised of prime agricultural areas, including specialty crop areas. It may also include rural lands that help to create a continuous productive land base for agriculture; and

An agri-food network which includes agricultural operations, infrastructure, services, and assets important to the viability of the agri-food sector."

Agri-food network is further defined as:

"Within the agricultural system, a network that includes elements important to the viability of the agri-food sector such as regional infrastructure and transportation networks; agricultural operations

including on-farm buildings and primary processing; infrastructure; agricultural services, farm markets, and distributors; and vibrant, agriculture-supportive communities."

1.3.2 County of Wellington Official Plan

The County of Wellington Official Plan was adopted by County Council on September 24, 1998, and approved by the Ministry of Municipal Affairs on April 13, 1999. Schedule B7 Land Use (Puslinch) of the County of Wellington Official Plan (see **Figure 4**) designates the subject lands as Secondary Agricultural and thereby forms part of the Rural System. In these areas, agriculture will continue to be the dominant use, but other uses are permitted, as discussed in Section 6.5 of the Plan, including:

a) all uses allowed in the Prime Agricultural Area;

b) small scale commercial, industrial and institutional uses; and

c) public services facilities.

According to the section 6.3 of the County Official Plan, the Rural System includes land designated *Secondary Agricultural Areas.* While farming is the primary activity in these areas, other uses, including residential and employment uses, are permitted so long as they do not adversely impact existing agricultural operations and keep with the rural character of the area.

Policy 6.5.5.d) states that development of small scale commercial, industrial, and institutional uses maybe permitted given "*the use will not hinder or preclude the potential for agriculture or mineral aggregate operations;"* .

As the proposed uses are not wholly supported by the *Secondary Agricultural* land designation in part due to their scale, a redesignation to *Rural Employment* is being pursued. These areas are lands set aside for industrial and limited commercial uses that would benefit from a rural location due to the need for a relatively large site, access to major transportation routes, or proximity to rural resources. These areas are to be used for dry industrial and limited commercial uses that do not use significant amounts of water nor produce significant amounts of effluent (Policy 6.8.1).

Section 4.6.5 of the County of Wellington Official Plan indicates that where development is proposed in a Prime or Secondary Agriculture area, a Council may require an assessment of the impacts the development may have on agricultural activities in the area. An assessment may include any or all of the following:

a) the opportunity to use lands of lower agricultural potential;

b) compliance with the minimum distance separation formulae for livestock operations;

c) the degree to which agricultural expansion may be constrained;

d) potential interference with normal agricultural activities and practices;

e) potential interference with the movement of agricultural machinery on roads;

f) such other concerns as a Council may consider relevant.

The following assessment has been completed in accordance with updated AIA Guideline Document and the County's requirements to comprehensively address all relevant considerations, including impacts on agricultural.

1.3.3 Township of Puslinch Zoning By-law

The subject lands are zoned Agricultural (A) in the Township of Puslinch Comprehensive Zoning By-law No. 023-18 (**Figure 5**). The proposed development is not permitted in this zone. The proposed zone is *Industrial (IND)* with a site-specific special provision to permit the proposed retail store and gas bar uses on the southern end of the site (IND(spXX)).

1.4 AIA Logistics

This AIA has been prepared at the request of the County of Wellington, which requires an AIA to evaluate the potential impacts of the proposed industrial development on the surrounding agricultural system components.

The report has been completed by qualified professionals, including Registered Professional Planner (RPP) certified by the Ontario Professional Planners Institute (OPPI), and an Articling Agrologist with the Ontario Institute of Agrologists (OIA). Full curriculum vitae for both contributing authors are provided in Appendix B.

A windshield survey for this study was conducted on November 4, 2025, following the County's request to undertake a Minimum Distance Separation (MDS) analysis for the subject application. During this site visit, all visible farm operations within a 1-kilometre radius of the subject lands were identified from the public road network, and associated crop types were recorded.

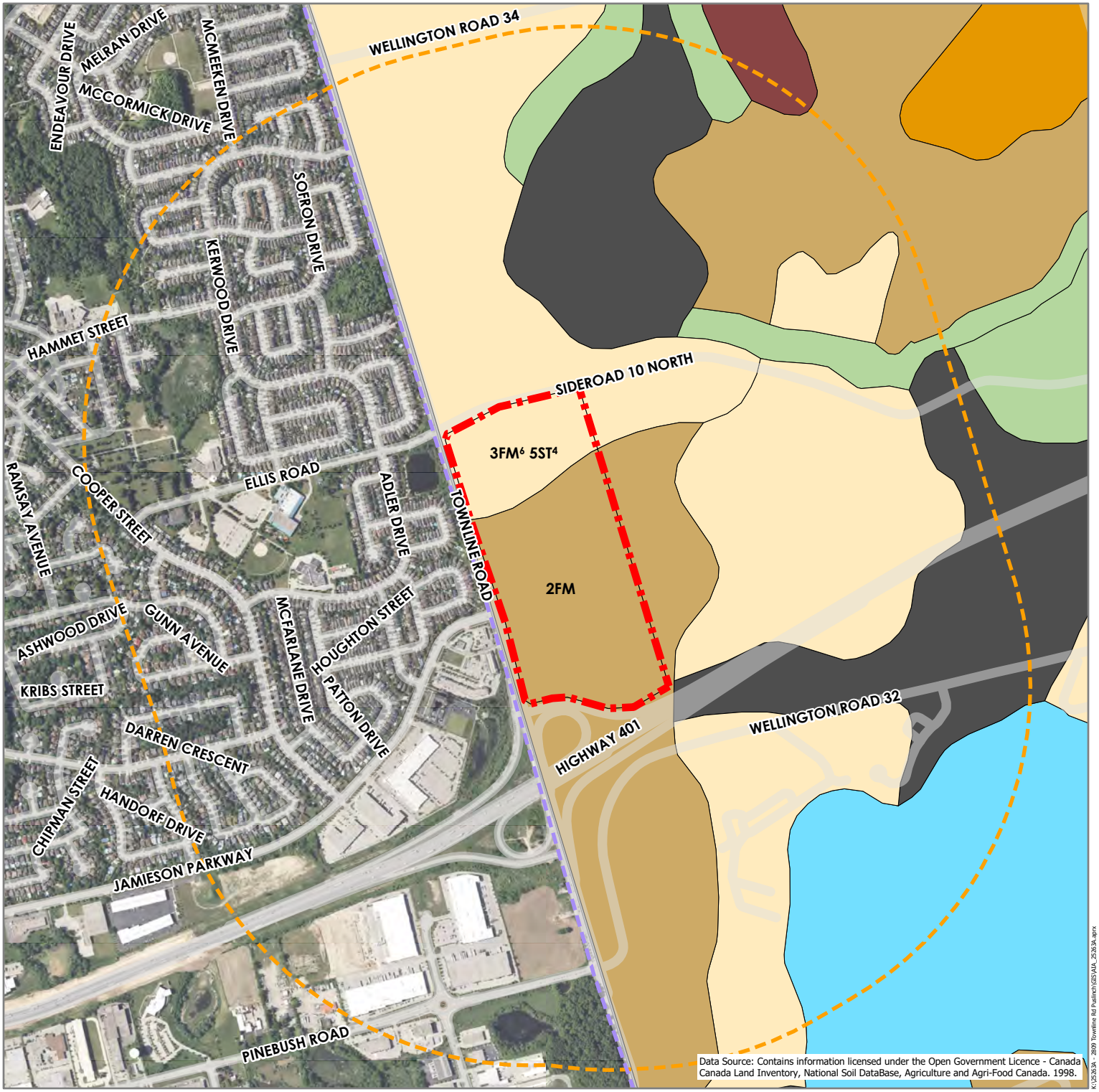


Figure 3 - Canada Land Inventory Map

Primary Study Area

Region of Waterloo Boundary

Secondary Study Area (1000m buffer)

CLI Soils
Land Capability For Agriculture

Prime
- Class 1 (No Significant Limitations)
- Class 2 (Moderate Limitations)
- Class 3 (Moderately Severe Limitations)

Lower Capability
- Class 4 (Severe Limitations)
- Class 5 (Very Severe Limitations)
- Class 6 (Natural Grazing Only)
- Class 7 (No Capability)
- Class 0 (Organic)
- Water
- Other

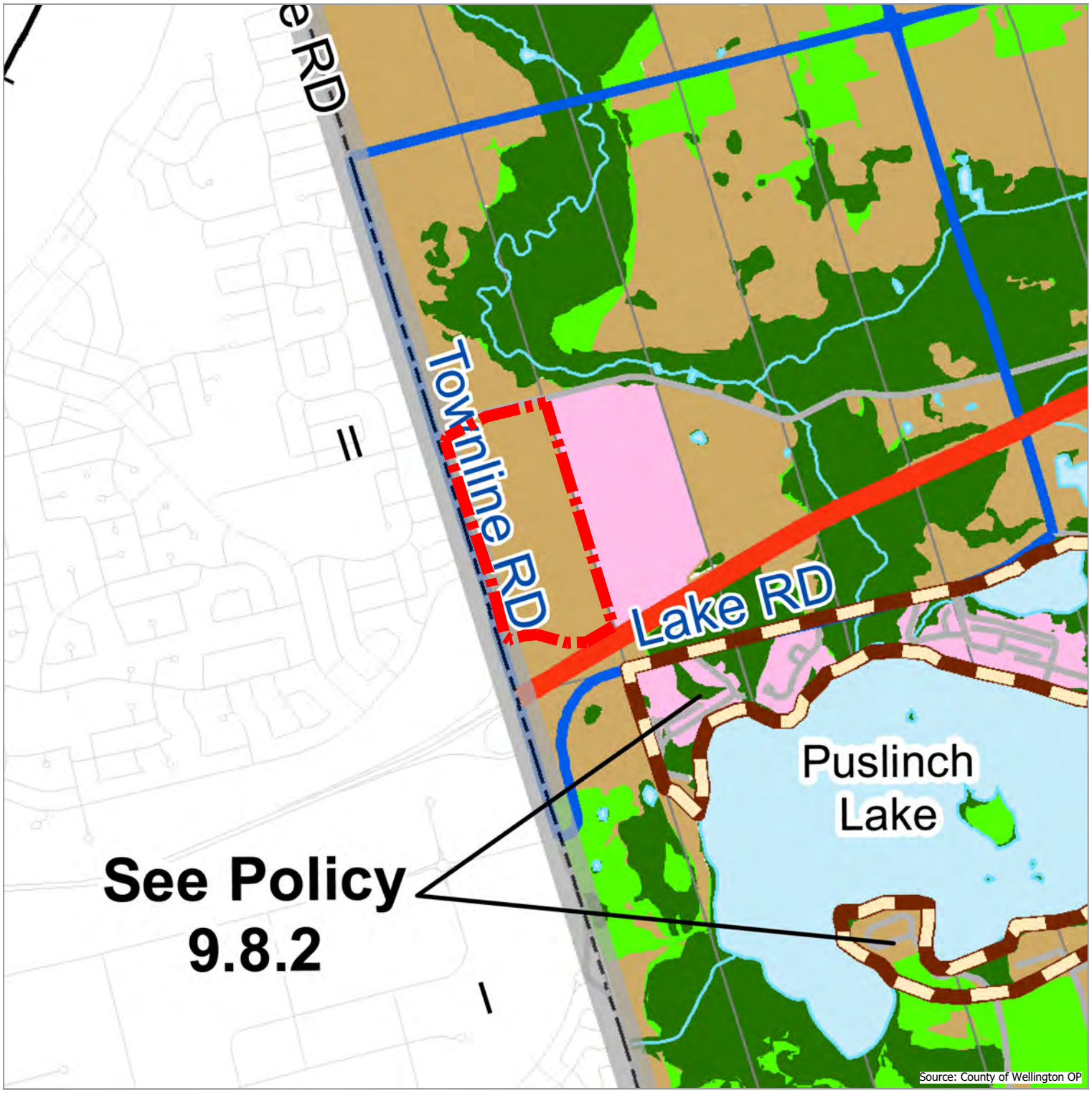


Figure 4 - Schedule B7: Land Use- Puslinch

Subject Lands
Core Greenlands
Greenlands
Secondary Agricultural
Recreational
PA Policy Area
County Roads
Provincial Highway
Waterbody
Watercourse

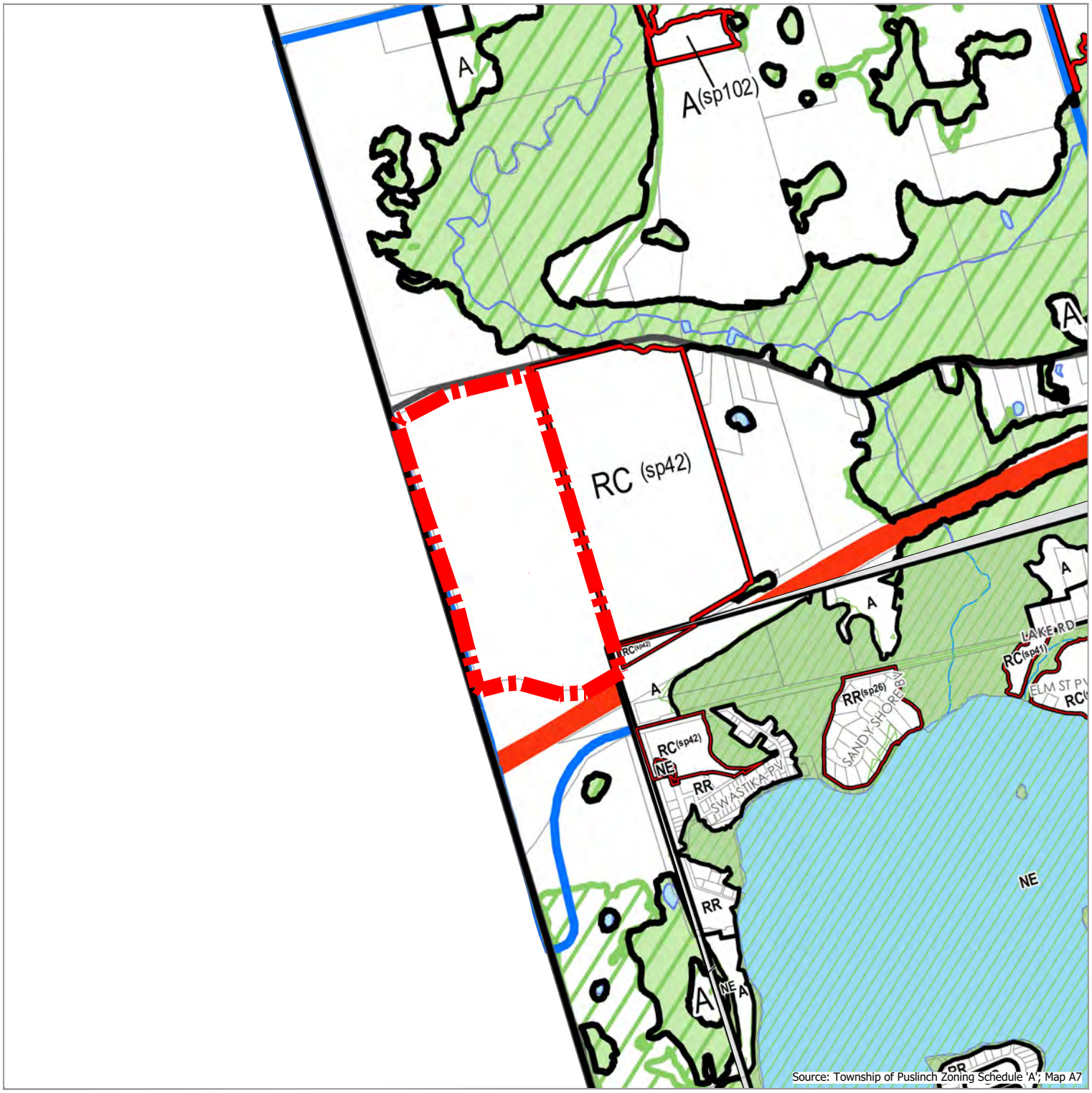


Figure 5 - Existing Zoning

- Subject Lands
- Site Specific Exemption
- Zoning Limits
- Environmental Protection Overlay
- Natural Environment
- A Agricultural
- NE Natural Environment
- RC Resort Commercial
- RR Resort Residential

2.0 Study Areas

2.1 Primary Study Area

Based on the OMAFA 'Agricultural Impact Assessment (AIA) Guidance Document' (herein referred to as 'OMAFA AIA Guidelines'), the primary study area when conducting an Agricultural Impact Assessment, is the area considered for the proposed development or infrastructure. Primary study area will include the project site or parcel(s) that will be directly impacted by the proposed non-agricultural use.

As shown in **Figure 2,** land uses within the primary study area consist of an agricultural field (Fallow in 2025), a farm, which includes a barn, a two-storey detached dwelling, and a one-storey development showroom with a small surface parking lot. These fields do not appear to have any established specialty cropping practices or perennial crops (e.g. orchards) that stray from the characteristics of the surrounding agricultural area. There are no visible signs of extensive agricultural improvements to the lands proposed to be licenced (e.g. new fencing, tile drainage, barns or greenhouse).

2.1.1 Canada Land Inventory (CLI) Soil Capability for Agriculture

The CLI system is the recognized system in Ontario for classifying areas with mineral soils according to their inherent capability for growing common field crops (corn, wheat, soybeans, oats, barely, perennial forest crops). CLI emphasizes the inherent capability of an area for field crops and is an interpretive classification system.

The 7 different capability classes indicate the general capability of the soil for growing common field crops (ex. 3FM). A description of these classes is provided below (those in bold are most relevant to this report):

- 1 – Soils in this class have no significant limitations in use for crops.
- **2 – Soils in this class have moderate limitations that restrict the range of crops or require moderate conservation practices.**
- **3 – Soils in this class have moderately severe limitations that restrict the range of crops or require special conservation practices.**
- 4 – Soils in this class have severe limitations that restrict the range of crops or require special conservation practices.
- **5 – Soils in this class have very severe limitations that restrict their capability in producing perennial forage crops, and improvement practices are feasible.**
- 6 – Soils in this class are capable only of producing perennial forage crops, and improvement practices are not feasible.
- 7 – Soils in this class have no capacity for arable culture or permanent pasture.
- O – Organic Soils (not placed in capability classes).

The 13 different capability subclasses indicate the primary type of limitation or hazard for growing common field crops (ex. 3FM). A description of these subclasses is provided below (those in bold are most relevant to this report):

- C – Adverse climate
- D – Undesirable soils structure and/or low permeability
- E – Erosion
- **F – Low fertility**
- I – Inundation by streams or lakes
- **M – Moisture limitations**
- N – Salinity
- P – Stoniness
- R – Consolidated bedrock
- **S – Combination of subclasses**
- **T – Topography**
- W – Excess Water
- X – This Subclass is comprised of soils having a limitation resulting from the cumulative effect of two or more adverse characteristics

When 2 soil types occur in an area shown on the map, a complex capability rating is shown which includes separate ratings for each soil (ex. $1^{8}4T^{2}$). The numeric superscripts denote the proportion of the area out of a total of 10.

Provincial mapping identifies the subject lands as containing Canada Land Inventory (CLI) Class 2FM soils and $3FM^{6}5ST^{4}$ soils. Class $3FM^{6}5ST^{4}$ soils indicate that 60% of the area consists of Class 3FM soils, which have **moderately severe limitations** restricting the range of crops or requiring special conservation practices due to **low fertility(F)** and **moisture limitation(M)**, while 40% of the area consists of Class 5ST soils, which have **very severe limitations** due to **combination of subclasses (S)** and **topography (T)**.

Class 2FM soils have **moderate limitations** that restrict the range of crops or require special conservation practices due to **low fertility (F)** and **Moisture limitation (M)**.

The subject lands comprise of "Fox Sandy Loam" and "Hillsburgh Fine Sandy Loam" of soil classifications. Fox Sandy Loam is a well-drained soil formed from calcareous sandy glacial outwash, typically found on gently undulating terrain. It features a thin, dark greyish-brown surface layer over yellowish-brown subsurface horizons, with highly variable depth to the B horizon due to changes in the sandy parent material. Although naturally low in water-holding capacity, Fox Sandy Loam supports pasture, hay, mixed grains, and silage corn, with productivity improved through fertilization.

Hillsburgh Fine Sandy Loam have developed from fine sands which are intermixed with and overlie the coarse, stony till of the Dumfries soils. These soils are very susceptible to wind erosion; small stones often appear at the surface in areas where soil loss has been severe. Both external and internal drainages are rapid.

2.2 Secondary Study Area

According to the OMAFA AIA Guidelines, the secondary study area for non-agriculture uses should include those lands which may be impacted with proposed development. At a minimum, the secondary study area should include lands adjacent to the primary study area but also extend beyond those lands to fully assess the potential impact from the proposed non-agricultural use. It is important that the secondary study area encompass enough area to allow for the assessment of different types of impacts (e.g., agricultural, *agri-food network*, hydrogeological, noise, transportation).

For the purposes of this assessment, a 1000 metres radius Secondary Study Area was selected to capture the potential impact area. As illustrated in **Figure 2** and described below, land uses within this area is minimally related to active farming systems.

2.2.1 Land Use Overview

The subject lands are located along the westernmost edge of the Township of Puslinch, adjacent to Townline Road, which serves as the municipal boundary and forms the western boundary of the subject lands. Townline Road is a Regional Road and a major arterial road designed to carry large volumes of traffic. Lands immediately west of the subject lands fall within the City of Cambridge in the Regional Municipality of Waterloo and consists primarily of urban settlement uses (e.g. mix of residential/non-residential uses). To the immediate east of the subject lands and forming the eastern property limit of the subject lands is the Puslinch Golf Club. Rural residential uses are predominantly located further east.

South of the subject lands is Highway 401 and an associated interchange. Beyond the Highway is Puslinch Lake and surrounding rural residential development. The subject lands are bounded to the north by Sideroad 10, which is an east/west collector road, North and opposite the lands to the north is an active farm operation (corn production in 2025) that includes a livestock barn and associated livestock. Details of this operation were obtained directly from the farmer and are provided in Appendix A.

Northeast of the subject lands is wetland and wooded areas. Beyond this area are several small farming plots that are not visible from the roadway; information regarding these lands was obtained through satellite and aerial imagery.

One livestock operation is located within the secondary study area (**Figure 2**). This operation, described in greater detail in Appendix A, consists of one beef cattle operation and one equestrian facility. Minimum Distance Separation (MDS) calculations related to one of these operations is provided in **Appendix E** of this report.

No specialized cropping practices or agricultural equipment were observed or documented within the Secondary Study Area. Additionally, no supportive agricultural uses or facilities (such as grain storage operations) that contribute to the broader agricultural system were identified within the study area.

Overall, the secondary study area reflects the character of the surrounding landscape, which is composed of fragmented agricultural parcels interspersed with rural residential uses, urban and rural settlement areas, and natural heritage features.

2.2.2 Census of Agriculture & Ontario Business, Agri-Food, and Farm Data Profile for Wellington County

The 2021 and 2016 Census of Agriculture and OMAFA's Ontario business, agri-food, and farm data profile for Wellington County were reviewed to provide an overview of agricultural production patterns and parcel size in the County.

North American Industry Classification System ("NAICS") data for 2011, 2016, and 2021 were utilized to determine trends in farm types within the County. In 2021, regarding crop production, Wellington County crop farming was dominated by oilseed and grain farming (26.9% of all farms), predominantly soybean farming (37.1% of oilseed and grain farms) and other grain farming (31.0%) as well as corn farming (18.6%)[1]. Oilseed and grain farming has increased in the County since 2011 (an increase of 28.3% in number of oilseed and grain farms from 2011 to 2021)[2]. As of 2021, the next most common category of crop farming in Wellington County is 'other crop farming' (8.1% of all farms), which primarily includes hay farming (62.3% of other crop farming). Other crop farming has decreased since 2011 (decrease of 13.8%)[1]. The only visible farm within secondary study is planted in corn, which generally reflects the broader agricultural patterns across Wellington County.

In terms of livestock, cattle ranching and farming comprised 33.5% of all farms (of which 57.1% of farms were beef cattle and 42.6% dairy cattle) in Wellington County. Cattle farming has exhibited a 10.4% increase in number of farms since 2011. Other animal farming comprises 12% of all farms within the County, primarily horse and other equine production (53.2%) and animal combination farming (32.8%). One livestock barn was observed within the entire Study Area (see **Figure 2**).

2.2.3 Census of Agriculture & Ontario Business, Agri-Food, and Farm Data Profile for Township of Puslinch

The 2021, 2016, and 2011 Census of Agriculture and OMAFRA's Ontario business, agri-food, and farm data profile for Township of Puslinch were reviewed to provide an overview of agricultural production patterns and parcel size in this census consolidated subdivision.

NAICS data for 2011, 2016, and 2021 were also utilized to determine trends in farm types within the Township. In 2021, crop farming in the Township of Puslinch was dominated by oilseed and grain farming, which accounted for 22% of all farms. Within this category, soybean farming made up 37.9%, corn farming 34.5%, and other grain farming 17.2%[1]. Oilseed and grain farming has increased in the Township since 2011 (increase of 3.6% in number of oilseed and grain farms from 2011 to 2021)[2]. As of 2021, the next most common category of crop framing in Puslinch is 'other crop farming' (15.2%), which primarily includes hay farming (65% of other crop farming). Other crop farming has decreased since 2011 (decrease by 23.1%). One corn farm is the only visible farmland production, which is generally reflective of agricultural patterns throughout Township of Puslinch.

In terms of livestock, other animal production comprised 26.5% of total farms (of which 65.7% of farms were horse and other equine production and 20% of animal combination farming) in Puslinch. Other animal production has exhibited a 35.2% decrease in number of farms since 2011. Cattle ranching and farming comprises 15.2% of total farms within the Township, of which primarily beef cattle (90%) and

[1] Table 32-10-0231-01 Farms classified by farm type, Census of Agriculture, 2021

[2] Table 32-10-0403-01 (formerly CANSIM 004-0200) Farms classified by farm type, Census of Agriculture, 2011 and 2016, inactive

dairy cattle (10%). As noted, one livestock operation was observed within the Secondary Study Area. The type of livestock facility observed is consistent with the agricultural trends identified in the Township's census data.

Based on the site visit, agricultural activities within the Primary and Secondary Study Area appear to be consistent with broader agricultural trends observed in Wellington County and Township of Puslinch. The surrounding crops include typical cash crops such as corn and cover cropping.

2.2.4 Microclimate for Specialty Crop Production

Climate data was obtained from the OMAFA document titled "Agronomy Guide for Field Crops – Publication 811 (June 2009)". The subject lands are located within the 2700-2900 average accumulated Crop Heat Units (CH-MI) area in Ontario (**Figure 6**). The Crop Heat Units (CHU) index was originally developed for field corn and has been in use in Ontario for 30 years. The CHU ratings are based on the total accumulated crop heat units for the frost-free growing season in each area of the province. CHU averages range between 2500 near North Bay to over 3000 near Windsor. The higher the CHU value, the longer the growing season and greater are the opportunities for growing value crops. According to OMAFA document, the subject lands are located within the 2700-2900 average accumulated Crop Heat Units (CH-MI) and as such, the lands are not subject to special climatic conditions. Given the typical climatic conditions, there are limited opportunities for growing speciality crops, and therefore, the subject lands have not been identified as a specialty crop area in the County of Wellington Official Plan and do not meet the criteria as identified by the Province.

Specialty crops are fruit, vegetables, and other crops grown commercially in Ontario that cannot be grouped with common field crops (such as corn). CLI does not provide a soils capability rating for specialty crop production. As discussed in Section 2.2.1 of this report, no specialty crop areas are designated by the Province, Wellington County and Township of Puslinch and there is not any evidence of specialty crop production within the primary and secondary study area.

2.2.5 Improvements for Agriculture

Agricultural uses within the subject lands (primary study area) and secondary study area consist of typical cash crop production such as corn and fallow lands. Our review of the AgMaps indicates that no tile drainage exists on the Primary and Secondary Study Area. No other specialized cropping practices or equipment were observed or are documented within the secondary Study Area.

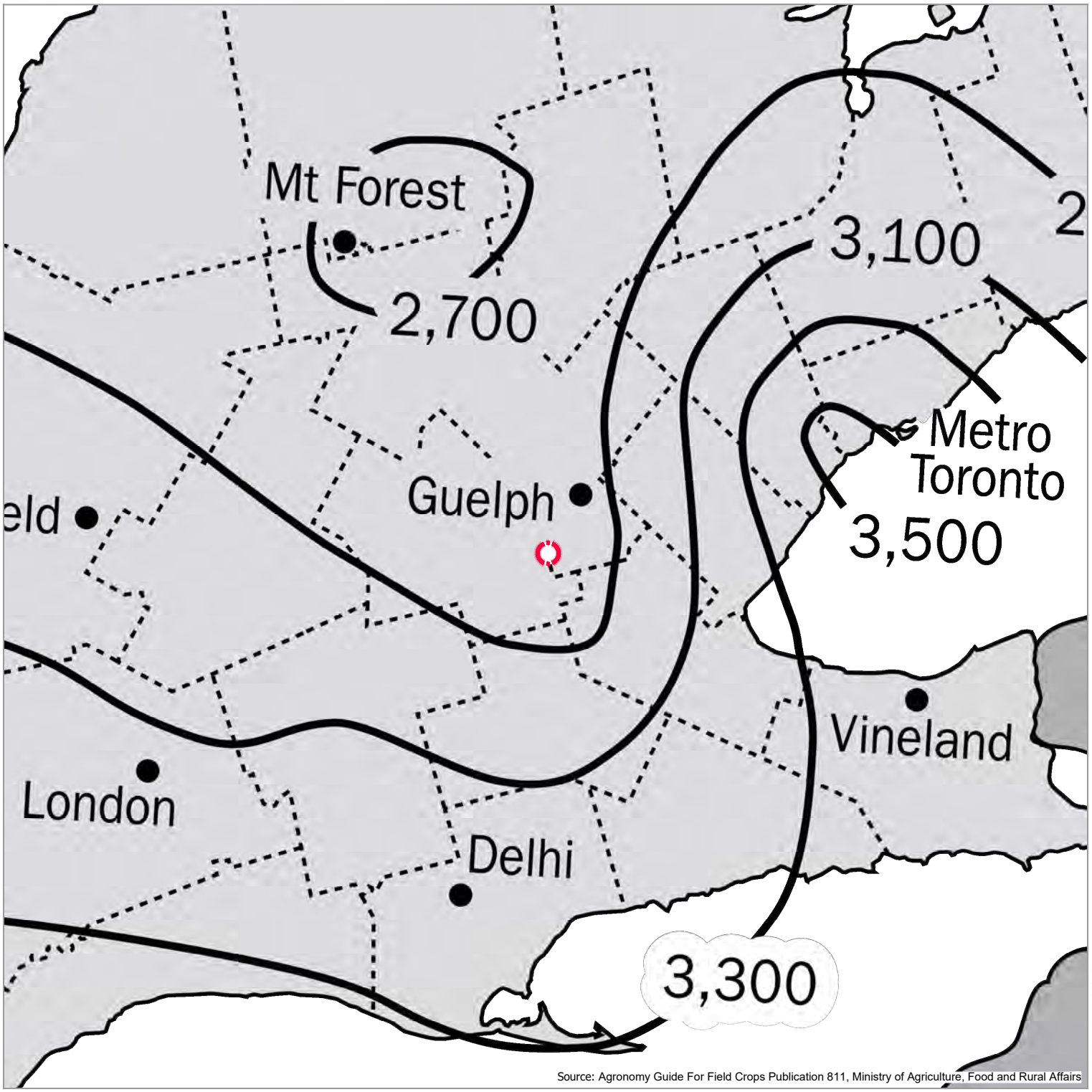


Figure 6 - Crop Heat Units

Subject Lands

3.0 Assessment of Impacts

A multidisciplinary assessment involving land use planning, agricultural analysis, and supporting technical disciplines has been undertaken to evaluate the potential adverse impacts of the proposed industrial development on the agricultural system. Relevant findings from other technical studies, including water resources, natural heritage assessment, and traffic assessments, have been reviewed and cross-referenced where applicable.

Potential impacts to the agricultural system were initially identified assuming no avoidance, minimization, or mitigation measures. The assessment of net impacts following the application of such measures is addressed in Section 4 of this report. The following sections outline the identified potential impacts of the proposed industrial development and the considerations used to evaluate the magnitude and significance of those impacts on the agricultural system within the study areas.

3.1 Reduction/Loss of Agricultural Land and Infrastructure

The proposed industrial development does not involve the removal of prime agricultural lands located within the County's designated prime agricultural lands. The subject lands are designated Secondary Agriculture and identified as a part of the Rural System and are not considered part of the County's core agricultural land base.

An existing barn located on the site will be demolished as part of the development; however, the structure is not currently used for livestock housing or agricultural production. The associated farmland has been fallow or planted in cover crops in 2025 and does not support intensive agricultural operations. No irrigation systems, subsurface drainage infrastructure, or greenhouse facilities are present on the subject lands.

While agricultural use and structures of the subject lands will be permanently discontinued following development, the proposal does not result in the permanent loss of designated prime agricultural areas or critical agricultural infrastructure. Although there will be a loss of agricultural land as a result of this development, the loss is negligible considering the presence of non-agricultural uses that surrounding the subject lands on three sides, which already significantly constrains the agricultural viability of the lands.

3.2 Fragmentation of Agricultural Lands

The secondary study area is characterized by a diverse mix of land uses, the majority of which are non-agricultural. These include the City of Cambridge urban settlement area, rural residential lots, recreational uses such as the Puslinch Golf Club, and natural heritage features. Together, these existing land uses contribute to a fragmented agricultural landscape independent of the proposed development.

The proposed industrial development will not create new isolated or severed agricultural parcels. Given the already fragmented landscape and the limited number of active agricultural operations within the secondary study area, the proposed development is not expected to materially alter existing patterns of agricultural land fragmentation.

Although the primary study area will be permanently removed from agricultural production, the surrounding context indicates that the proposed development will have a negligible effect on long-term agricultural land fragmentation in the area.

3.3 Compatibility Impacts

The proposed industrial development is not anticipated to create compatibility conflicts with nearby agricultural operations. A review of Minimum Distance Separation (MDS I) requirements identified no constraints related to odour impacts from the livestock operation located to the north (**Appendix E**).

The subject lands are adjacent to the City of Cambridge settlement area to the west, the Puslinch Golf Club to the east, and rural residential uses to the south and northeast. As a result, the surrounding area already exhibits a high degree of non-agriculture land uses, indicating an established interface between agricultural and non-agricultural activities.

With the implementation of mitigation measures outlined in Section 4, including edge planning techniques and awareness and education strategies, compatibility impacts between the proposed development and nearby agricultural operations are not anticipated.

3.4 Economic and Community Impacts

The subject lands do not contain agricultural support infrastructure or services such as farmers' markets, grain elevators, agri-tourism facilities, or processing operations that are integral to the surrounding agricultural community. The lands do not produce specialized commodities upon which the local agricultural system or agri-tourism sector relies. Existing agricultural activity consists primarily of common cash cropping and cover cropping practices typical of the broader County.

Phased development is recommended to allow the lands to remain in agricultural use until they are required for construction, supporting a gradual transition of land use over time. Overall, the proposed industrial development is not expected to result in negative economic or community impacts to the agricultural sector.

3.5 Traffic Impacts

Townline Road, classified as a County Road under the County of Wellington Official Plan, functions as a defined human-made boundary between the City of Cambridge and the Township of Puslinch. The segment of Townline Road fronting the subject lands coincides with the municipal boundary.

The Traffic Impact Study prepared by GHD Limited identifies three site access points. The northernmost access is identified as Site Access 1. Site Access 2 is located at the intersection of Jamieson Parkway and Townline Road. All access points are connected to Townline Road.

The existing farm to the north has three access points. The primary access is through the residential driveway that connects to the Townline Road. A secondary access is from Wellington Road 34, which provides better access to the northern portion of the farm. The third access point is from Sideroad 10 N (Ellis Road), although this entrance does not appear to be in use.

The Traffic Impact Study did not consider the effects of the proposed development on agricultural-related traffic. However, given the designation of Townline Road as a Major Road in the County Official Plan and the surrounding existing land uses and the limited extent of agricultural activity within the secondary study area, traffic associated with the proposed development is expected to have negligible impacts on neighbouring agricultural operations.

3.6 Natural Environment Impacts

GeoProcess Research Associates (GeoProcess) was retained to complete a Natural Heritage Assessment (NHA) for the subject lands. The assessment evaluated the potential effects of the proposed development on the Puslinch–Irish Creek Wetland Complex.

The NHA concluded that there is a low likelihood that the proposed development would result in physical modification of the wetland or adversely affect its hydrologic or hydrogeologic functions. Accordingly, no significant negative impacts on the wetland complex are anticipated. It also concluded that as no short-term construction dewatering from the groundwater source is expected, no significant impacts to the potential groundwater users including agricultural uses are anticipated if the well exists and are in service.

4.0 Measures to Address Potential Impacts

Following the identification of potential adverse impacts associated with the proposed non-agricultural use, this AIA identifies measures to address impacts to the agricultural system within the study areas.

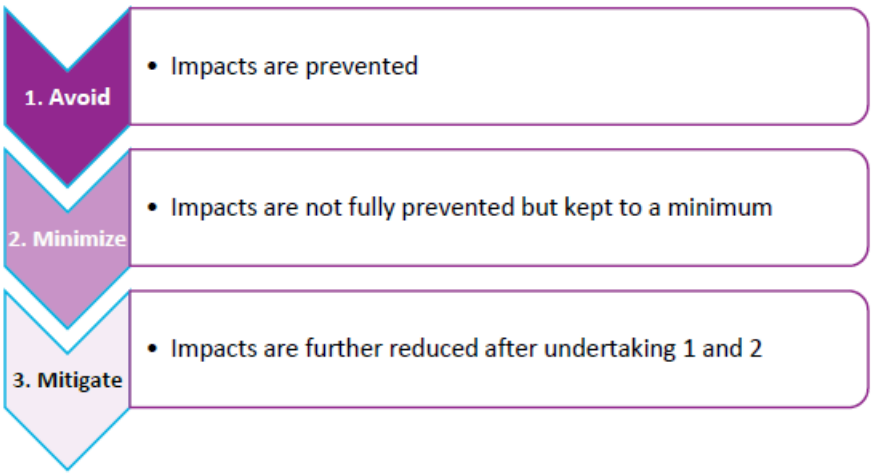
4.1 Hierarchy of Measures

The following chart illustrates the hierarchy of measures used to address potential impacts to the agricultural system. This hierarchy is consistent with provincial policy direction, and prioritizes the avoidance of impacts, followed by minimization and mitigation.

Avoidance of impacts is the highest priority and refers to preventing impacts altogether. The proposed development is located within Secondary Agriculture and Rural Lands rather than within a prime agricultural area, where concentrations of agri-food networks and MDS conflicts are more prevalent.

Where impacts cannot be fully avoided, efforts are made to minimize impacts by limiting their extent or severity. The selection of lower-priority agricultural lands for the proposed development reflects this approach.

Mitigation measures are implemented where residual impacts remain following avoidance and minimization efforts. These measures further reduce the severity or extent of impacts on the agricultural system.



4.2 Measures to Avoid Impacts

Measures taken to avoid impacts to the agricultural system are documented as part of this AIA. The siting of the proposed development within Secondary Agriculture and Rural Lands demonstrates that alternative locations outside of prime agricultural areas were selected. This approach avoids direct impacts on the County's prime agricultural land base. Additional avoidance measures are summarized in Table 2.

4.3 Measures to Minimize Impacts

This section outlines measures intended to minimize impacts where avoidance is not possible. While some impacts to the agricultural system may remain, design and site selection strategies have been employed to reduce adverse effects to the extent feasible. The proposed development has been planned to prioritize lands of lower agricultural capability and to limit disruption to surrounding agricultural uses.

4.4 Measures to Mitigate Impacts

Measures to mitigate residual impacts are further described in Section 4.5. Mitigation measures are intended to reduce the severity of impacts associated with the proposed industrial development and may include edge planning treatments between the development and adjacent agricultural lands, as well as road or access improvements that enhance land use compatibility.

4.5 Net Impacts

Once measures to avoid, minimize, and mitigate impacts have been identified, the remaining net impacts to the agricultural system are documented. Net impacts represent those effects that persist following the implementation of all proposed measures. A summary of net impacts is provided below.

Table 2: Summary of Net Impacts

Objective	Mitigation Measure	Description
Minimize the loss of agricultural land	Select areas with less agricultural land and lower priority agricultural lands	The subject lands are not located within the County's prime agricultural area and constitute lower-priority agricultural lands.
	Phased Development	If possible, the construction of the development should be phased to minimize the total disturbed and maximize the amount of land to remain in agriculture for as long as possible.
Minimize the fragmentation of agricultural land	Maintain farm parcels	The surrounding agricultural system is already highly fragmented by nature of urban settlement area, Highway 401 and County Roads, Recreational Areas, rural residential and surrounding natural features. The proposed development will not serve to significantly worsen fragmentation.
Minimize impacts on farmland and agricultural operations	Minimum Distance Separation	MDS I setbacks has been conducted and report is Available in Appendix C. The proposed development complies with MDS I.
	Select compatible land uses; put lower impact development adjacent to farmland and operations	The proposed development would be buffered from adjacent agricultural land uses through the provision of setbacks, edge planning (e.g. landscape plantings), and existing vegetation along Sideroad 10.
	Design to support agriculture (e.g. help farms to continue to operate; help prevent and reduce trespassing and vandalism)	Potential conflicts between the proposed industrial development and the agricultural operation located north of the subject lands will be minimized through the implementation of appropriate physical and visual buffering measures. All proposed site access points connect directly to Townline Road, thereby limiting interaction with adjacent agricultural operations. With the exception of the northern boundary, which abuts an active farm, the subject lands are surrounded by established non-agricultural uses. This land use pattern is long-standing and reflects an existing condition rather than the introduction of a new land use interface.
Mitigating impacts during construction or operations (e.g. mitigate dust, noise)	Adjust operational procedures to accommodate agriculture in the area	This area of the County and Township is characterized by higher levels of non-agricultural activities; surrounding agricultural uses are accustomed to the operational procedures associated with residential and non-residential development. Measurements like dust suppression will be applied during construction as required.

	Vegetative buffers and edge planning	Proposed vegetative buffers will create setback between the proposed development and surrounding land uses, in particular the existing agricultural operation to the north. Any topsoil and subsoil stripped during construction can be used for final landscaping, edge buffering and green infrastructure.
	Maintain, restore, or construct farm infrastructure	The subject lands contain a barn, a two-storey detached dwelling, and a one-storey development showroom with a small surface parking which all proposed to be demolished. The lose of existing agricultural infrastructure is negligible.
Mitigate ongoing impacts from new development	Implement measures that can be in place post development to support compatibility with agriculture	Traffic Impact Study conducted by GHD Limited and concluded that the proposed industrial development can be accommodated by the existing road network given the recommended improvements in Jamieson Parkway/Site Access 2 and Townline Road and Townline Road and Site Access 1. As noted, buffer planting along the northern property boundary should be considered through the site plan stage. Non-invasive, native and drought-tolerant plant species should be utilized to prevent the prevalence of such plant species on the surrounding agricultural lands. The lighting plan required through site plan approval should minimize glare and light trespass on abutting lands. A salt management plan should be implemented through site plan approval to help minimize the use of salt on all proposed paved areas and help minimize the impact and spread of salt on adjacent lands.
Education to achieve greater compatibility between agricultural and non-agricultural uses	Education and awareness	Fieldgate Properties will proactively engage in public education regarding the development process and foster collaborative relationships with neighbouring agricultural operations. The proponent will also continue to educate its staff and contractors to promote awareness of agricultural practices and mitigate any compatibility concerns during construction or post construction.

5.0 Recommendations

Based on our analysis, the following recommendations are made to reduce the impacts of the proposed industrial development on the surrounding agricultural uses and operations in the secondary study area:

1. During construction, agricultural education should be provided to all construction personnel to encourage respectful behaviour towards the agricultural community and treatment of agricultural land. For example, encourage consideration of farm equipment on roadways and request that vehicles and equipment be kept off adjacent cropland.
2. The use of edge planning techniques should be incorporated to ensure that surrounding farm operations are protected.
3. Best management practices for the use of salt should be incorporated to help mitigate potential adverse impacts on surrounding lands, and the use of non-invasive plant species should be implemented in all landscaping.
4. All the recommendations of this Report and other technical reports as applicable should be implemented to minimize and prevent impacts to adjacent and surrounding agricultural uses and operations.
5. Any topsoil and subsoil stripped during construction can be used for final landscaping, edge buffering and green infrastructure.

6.0 Summary

The proposed development is not anticipated to have a negative impact on the long-term viability of agriculture within the County and Township. This opinion recognizes the following:

- The industrial development is proposed on approximately 33 hectares (81.5 acres) of land which is not designated as a prime agricultural area.
- The surrounding agricultural area is already fragmented by nature of proximity to the existing City of Cambridge settlement area, non-agricultural uses, and rural residential uses. The level of fragmentation within the surrounding area decreases the agricultural priority of the lands for agriculture.
- The subject lands are not within a specialty crop area.
- The proposed industrial development complies with the minimum distance separation formulae.
- The subject lands exhibit characteristics of lower priority agricultural lands given existing fragmentation in the area, proximity to existing settlement area, non-agricultural uses and limited agricultural improvements on the land.
- Impacts on surrounding agricultural operations can be mitigated based on the recommended mitigation measures included in this report and implemented through future planning applications.
- Impacts from noise and dust during construction, if any, will be mitigated through implementation of prescribed technical requirements/ recommendations.

Respectfully submitted,

MHBC

Pierre Chauvin, BSc (Agr.), MA, MCIP, RPP
Partner

Danial Salari, MSc (Agr), MSc (Pl), A.Ag.
Planner

A

Appendix A: Secondary Study Area Review

SECONDARY STUDY AREA – LIVESTOCK FACILITY/MANURE STORAGE SUMMARY TABLE				
Site	**Address**	**Facility Type**	**MDS Required**	**Notes**
1	3367 Townline Road	Beef cattle barn	Yes – 101 meters setback required – Complies *Information was collected from the farmer*	This farm is approximately 40.46 hectares (100 acres) in size and is located immediately north of the subject lands, making it the closest and only livestock operation to the proposed rezoning area. The property includes one barn and connected sheds, a paddock, residential units, and two storage barns. Based on a roadside site visit and aerial imagery, it is evident that the farmland is used for corn production. Beef cattle were visible during the site visit, and a pasture is connected to the livestock barn. A portion of the farm to the east contains natural features. This farm is situated at the westernmost edge of the Township of Puslinch, adjacent to the settlement area boundary of the City of Cambridge. West of the farm lies Townline Road, and beyond that is Kerwood Drive, a residential street with detached townhouses. 
Note: Livestock barn/manure storage identification and capability of buildings/structures for housing livestock or storing manure were determined in part based off the considerations outlined in Section 8 of the Province's MDS Document.				

B

Appendix B: Authors' Curriculum Vitae

Education

University of Waterloo
Master of Arts, Regional Planning and Resource Development
1997

University of Guelph
Bachelor of Science in Agriculture
1993

Professional Associations

Registered Professional Planner (RPP)

Member, Canadian Institute of Planners (CIP)

Full member, Ontario Professional Planners Institute (OPPI)

Member of Parks & Recreation Ontario

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MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

Pierre Chauvin

BSc(Agr), MA, MCIP, RPP

Pierre Chauvin joined the firm as a Planner in 1998. Mr. Chauvin provides urban and rural planning analysis and research services for public and private sector projects across Ontario.

His professional activities include project management, community planning, and land development. Pierre's experience ranges from residential and commercial development, environmental and recreational planning and resource management.

Pierre also has specific expertise in rural and agricultural planning. He has prepared agricultural impact assessments as part of settlement area expansions and development proposals. He also has experience with MDS and the Nutrient Management Act, and has provided expert agricultural and planning evidence at the Ontario Land Tribunal and other similar boards/tribunals.

Pierre holds a Masters degree in Regional Planning and Resource Development and a Bachelor of Science in Agriculture degree with a major in Natural Resources Management. Pierre is also a full member of the Canadian Institute of Planners and Ontario Professional Planners Institute.

Professional History

Partner, MacNaughton Hermsen Britton Clarkson Planning Limited (2013 – Present)

Associate, MacNaughton Hermsen Britton Clarkson Planning Limited (2004– 2013)

Planner / Senior Planner, MacNaughton Hermsen Britton Clarkson Planning Limited (1998 – 2004)

Assistant Planning Officer, Upper Grand District School Board (1997 – 1998)

Research Assistant (Nutrient Management), Land Resource Science Department, University of Guelph (1993 – 1995)

Professional Associations

Member of the Waterloo Region Homebuilder's Association and City of Kitchener Liaison Group

Member of the Waterloo Region Homebuilder's Association and Waterloo Region Liaison Group

Member of the Waterloo Region Homebuilder's Association Laison Group with the Townships of Woolwich and Wilmot

Past Chair of the Homebuilders' Association Liaison Committee with the Grand River Conservation Authority

Past Chair and member of the Industry Luncheon Committee, Guelph & District Homebuilders' Association

Past Member of Board of Directors, Guelph & District Homebuilders' Association

Past Member, Committee of Adjustment for the Township of Centre Wellington

Past Member, Heritage Centre Wellington Committee (LACAC)

Past Vice-Chair, Village of Elora Planning Advisory Committee

Selected Project Experience

Agricultural/Rural Planning

- Project lead to undertake a LEAR Study for the Township of Amaranth, County of Dufferin
- Project planner to undertake a review of the Minimum Distance Separation formulae for the Region of Peel and Town of Caledon as part of their LEAR Study.
- Review and provided opinion to the Township of Guelph-Eramosa regarding the revised Minimum Distance Separation Formulae.
- Project planner for the preparation of an agricultural assessment of potential growth areas as part of the City of Brantford Growth Strategy/Official Plan Review.
- Preparation of agricultural impact statements/assessments including MDS I & II assessments on behalf of various private sector clients in support of development and aggregate applications.
- Preparation of an agricultural assessment on behalf of the Township of Guelph/Eramosa to explore the feasibility and potential of a dual Agricultural/Rural designation approach in the Official Plan.

Parks & Recreation

- Project lead and consultant to the City of Port Colborne to complete a Parks and Recreation Master Plan.
- Project lead and consultant to the Town of Collingwood to complete a Parks and Recreation Master Plan.
- Project lead and consultant to the Town of Grimsby to complete a Parks and Recreation Master Plan.
- Project lead and consultant to the City of Kitchener to undertake a Business Case for the Doon Pioneer Park Community Centre Expansion.
- Project lead and consultant to the Town of Cobourg for the Cobourg Community Centre and YMCA Northumberland Joint Facility Needs Assessment.
- Project lead and consultant to the Town of Cobourg for the preparation a Recreation Strategy and Implementation Plan.
- Project Lead and Consultant to the Town of Caledon in the preparation of a Parks and Recreation Visioning Plan.
- Consultant to the Township of West Lincoln in the preparation of a Parks and Recreation Master Plan.

- Project planner, Township of Guelph-Eramosa Parks, Recreation and Culture Master Plan.

Source Water Protection

- Prepared Official Plan Amendment and policies as well as implementing Zoning By-law to implement the Source Water Protection Plan policies for the Counties of Norfolk, Elgin and Middlesex.
- Prepared Official Plan Amendment and policies to implement the Source Water Protection Plan policies for the County of Wellington.
- Consultant to Grand River Conservation Authority, County of Wellington and County of Perth in the development of Source Water Protection water quality policies for the Lake Erie Region Source Protection Plan.
- Prepared Official Plan Amendment and policies to implement the Groundwater Protection Strategy for the County of Wellington.

Official Plan/Zoning By-laws

- Project lead and consultant for the preparation of an Official Plan Update for the Township of Amaranth (on-going)
- Project lead and consultant for the preparation of an Official Plan Update for the Municipality of Kincardine.
- Project lead and consultant to the Municipality of Kincardine for the preparation of a Comprehensive Zoning By-law Review (on-going).
- Project lead and consultant to the Township of Huron-Kinloss for the preparation of a Comprehensive Zoning By-law Review.
- Project lead and consultant for the preparation of an Official Plan Update for the Township of Huron-Kinloss.
- Project lead and consultant to the County of Norfolk to prepare an Issues and Report for the Hastings Drive Zoning By-law Study.
- Project planner for preparation of a Consolidated Zoning By-law for the City of Kawartha Lakes (involved consolidating 17 By-laws).

Special Studies & Other

- Consulting planner for the City of Stratford to review and process select development applications.
- Consulting planner for the County of Perth to review and process planning applications.
- Consulting planner for the County of Bruce to review Consent and Minor Variance applications for the Lakeshore and Peninsula Hubs.
- Project planner for the Municipality of North Perth to complete a Secondary Plan and Master Servicing Plan for North-East Listowel (on-going).
- Project Lead and planner for the Upper Grand District School Board for the approval of new secondary school in the City of Guelph.
- Consultant to the Upper Grand District School Board regarding the justification and approval of a new secondary school in the Township of Centre Wellington, including a settlement area expansion.
- Consultant to the Huron-Perth Catholic District School Board regarding the justification and approval of a new elementary school in the Town of North Perth, including an agricultural impact assessment for a proposed expansion of the settlement boundary to accommodate the school.
- Justification of an urban expansion in the former Town of Listowel (Municipality of North Perth) and preparation of a Plan of Subdivision for a 50 acre property. The justification included an assessment of agricultural impacts and servicing considerations.

- Consultant to the City of Woodstock regarding the justification and approval of the East Woodstock Secondary Plan & Design Study. Prepared Official Plan Amendment and policies to implement the Secondary Plan.
- Consultant to the Town of North Perth on the Southeast Listowel Community Plan.
- Project planner providing planning services to the Township of Guelph-Eramosa. Review of applications, and preparation and presentation of planning reports to Council.
- Review and/or preparation of numerous planning approvals relating to draft plan of subdivisions, draft plan of condominiums, site plans, Official Plan amendments, Zoning By-law amendments, consents and minor variances throughout the Region of Waterloo, the Counties of Wellington, Perth, Bruce, Oxford, Huron and surrounding areas.
- Advisor to various aggregate producers regarding the review of new Official Plan policies in the Region of Durham and County of Oxford.
- Project Planner to the Aggregate Producers' Association of Ontario on the review of the Oak Ridges Moraine Conservation Plan.
- Coordinating the design and preparation of site plans under the Aggregate Resources Act. Research and preparation of Planning Reports and Aggregate Resources Act Reports for license and permit applications, including work for companies such as Lafarge Canada, Dufferin Aggregates, Federal White Cement and Beachville Lime Limited.

Awards / Publications / Presentations

2025	OPPI PlanON Award – Education Category – Empowering the Future: Activa Partners with Groh Public School for a Unique Community Project, September 18, 2025
2017	Designing Public Spaces to Support Vibrant Communities – Presentation on Park Land Dedication and Implications of Bill 73, September 15, 2017
2012	OPPI – Southwest District – Presentation on Source Water Protection Planning and Implementation, October 25, 2012
2012	Ontario Sand and Gravel Association – Presentation on Implications of Source Water Protection on Aggregate Operations, November 8, 2012.
2004	B. Hermsen and P. Chauvin, 2004. Elementary Schools and Residential Absorption Rates in New Neighbourhoods. Spring 2004 Ontario Expropriation Association Newsletter.
2003	Nutrient Management Act - Presentation to the Municipal Law Seminar Series, in co-operation with Kearns McKinnon LLP, February 26, 2003.
1997	Planning and Development of Recreational Trails on Private Lands: A Case Study of the Grand Valley Trails Association. Unpublished M.A. Thesis, School of Urban and Resource Development Planning, Faculty of Environmental Studies, University of Waterloo, Ontario

Danial Salari

MSc(Agr), MSc(Pl), A.Ag.

Danial Salari joined MHBC in January 2025. He provides a range of planning support and consulting services to both public and private sector clients mainly in related to rurl planning initiatives. This support includes conducting policy reviews and analyses and preparing due diligence reports and assessments.

Danial regularly assists with obtaining various development approvals including Plan of Subdivisions, Site Plans, Official Plan Amendments, Zoning By-law Amendments, Consents and Minor Variances. He also regularly provides support to senior staff in a range of projects including supporting the development of Consent applications, Aggregate Resource extraction, and Battery Energy Strategy System (BESS) applications.

Danial received his Master of Science in Rural Planning from the University of Guelph in 2024. He also received a Master of Science in Ecologic Agriculture in 2018 and a Bachelor of Science in Agricultural Engineering in 2010.

Professional History

Planner, MacNaughton Hermsen Britton Clarkson Planning Limited (2025 – present)

Student Planner, Region of Peel (2024)

Farm Inspector, Ecocert Canada (2023)

Project Planner & Data Analyst, Rural Ontario Institute (2023)

Production Committee Chair & Board Member, Khorasan Organic Association (2014-2019)

Sustainability Consultant, Sadaf rah Abrisham (2011-2014)

Education

University of Guelph
Master of Science in Rural Planning and Development
2024

University of Shahid Beheshti
Master of Science in Ecologic Agriculture
2018

Ferdowsi University of Mashhad
Bachelor of Science in Agronomy
2010

Professional Associations

Articling Agrologist (A.Ag.)

Member, Ontario Professional Planners Institute (OPPI)

Member, Ontario Institute of Agrologists (OIA)

Member, Agriculture and natural Resources Engineering Organization of Iran

Trained in the UNEP for Sustainable Development

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Professional Experience

Agriculture / Rural

- Agricultural Impact Assessments for aggregate licence applications, settlement area boundary expansions, and non-agricultural uses in prime agricultural areas
- Minimum Distance Separation (MDS) review and analysis
- Research, preparation and co-ordination of reports and approvals for agricultural uses, agriculture-related uses, and On-Farm Diversified Uses (OFDUs)

Aggregate / Industrial

- Property investigations and planning assessments for due diligence reviews for mineral aggregate and concrete and asphalt plant projects
- Preparation of Planning and Land Use Considerations reports for aggregate projects

Policy Research and Analysis

- Provincial and local Municipal Policy Review and Analysis
    - Provincial Planning Statement, 2024
    - Agricultural Impact Assessment (AIA) Guidance Document
- Undertake extensive research of land use policy and housing market data to support Regional Housing Affordability analysis.
- Review planning applications in support of Regional Housing comments
- Preparation of due diligence reports to identify applicable policies and regulations for proposed developments in municipalities across Ontario.

Residential / Mixed-use / Retail

- Preparation of planning assessments and due diligence reviews to identify development potential of properties for a range of clients
- Research, preparation and co-ordination of reports / applications under the *Planning Act* (Zoning By-law Amendment, Official Plan Amendment)

Project Coordination

- Consent and land severance applications
- Coordination of technical requirements with various internal and external subcontractors.

Public Engagement

- Facilitation of the Indigenous Seed Selection Knowledge sharing workshop with Biinjitiwaabik Zaaging Anishinaabek (Rockey Bay First nation) and Netmizaaggamig Nishnaabeg (Pic Mobert First Nation)

Special Initiatives and Accomplishments

- Received the Highly Qualified Personnel (HQP) Scholarship from OMAFA

C

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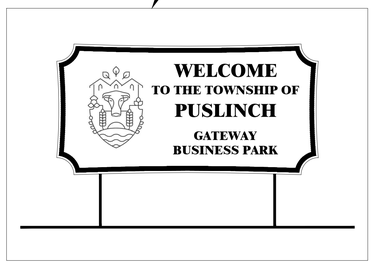
D

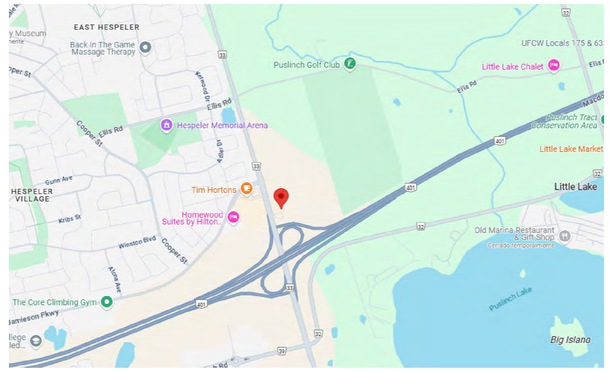
Appendix D: Proposed Site Plans



ZONING MATRIX		
LEGAL NAME: PART LOT 1, CONCESSION 2, PUSLINCH, PARTS 1, 2 & 3 61R2992 AND AS IN ROS257095 SOUTH OF MS47320; EXCEPT PART 2 61R642, PART 1 61R6501, PARTS 1 & 2 61R2843, PARTS 1, 2, 3, 5, 6, 7 & 8 61R9198, PART 1 61R9263, PART 1 61R9689 AND PART 1 EXPROPRIATION PLAN WC505537; T/W RO693735; TOWNSHIP OF PUSLINCH		
ITEM	PROPOSAL	EXISTING
ZONING CATEGORY	INDUSTRIAL (IND)	AGRICULTURAL (A)
GROSS SITE AREA (m²)	337,346 m2 (33.7ha)	
TOTAL GROSS FLOOR AREA (m²)	94358.00	N/A
	PROPOSED	REQUIRED
MINIMUM REQUIRED LOT AREA (HA)	33.7	0.4
MINIMUM REQUIRED LOT FRONTAGE (m)	752	30
MINIMUM REQUIRED FRONT YARD (m)	46	6
MINIMUM REQUIRED INTERIOR SIDEYARD (m)	36	5
INTERIOR SIDE YARD ADJACENT TO RESIDENTIAL ZONE (m)	N/A	15
MINIMUM REQUIRED EXTERIOR SIDEYARD (m)	141	15
MINIMUM REQUIRED REAR YARD SETBACK (m)	21	7.5
REAR YARD ADJACENT TO RESIDENTIAL ZONE (m)	N/A	15
MAXIMUM PERMITTED LOT COVERAGE (%)	28%	75%
MINIMUM REQUIRED LANDSCAPED OPEN SPACE	17%	15%
MAXIMUM PERMITTED BUILDING HEIGHT (m)	25	25
BUFFER IF ADJACENT TO RESIDENTIAL ZONE BOUNDARY (m)	N/A	1.5
MTO SETBACK (m)	14	14
BUILDING FLOOR AREA		
BUILDING 1	**m2**	
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
BUILDING 2		
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
BUILDING 3		
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
BUILDING 4		
INDUSTRIAL	9,384.00	
(10%) OFFICE	1,043.00	
TOTAL	10,427.00	
BUILDING 5		
INDUSTRIAL	9,384.00	
(10%) OFFICE	1,043.00	
TOTAL	10,427.00	
BUILDING 6		
INDUSTRIAL	8,833.00	
(10%) OFFICE	981.00	
TOTAL	9,814.00	
RETAIL STORE	15,090.00	
TOTAL AREA	94,358.00	

PARKING REQUIREMENT
Building 1-6: Parking stall ratio: 1/100 m² for the first 10,000 m² of floor area and 1/200 m² for any floor area after the first 10,000 m² Business/Professional Office: 1/40 m² Bicycle space (0.6X1.8m) ratio: 2/1000 m2 for industrial uses and 2 or 1/1000 m2 for retail uses, whichever is greater
Retail Store: 1/20 m²
Gas Pump: 1/Pump
Barrier-free stalls: 1 stall if the total number of parking stalls is between 3 and 25 stalls. 1 stall + 3% if the total number of parking stalls is between 26 and 100 stalls. 4 stalls + 2% if the total number of parking stalls is between 101 and 200 stalls. 8 stalls + 2% if the total number of parking stalls is equal to or greater than 201 stalls
Loading Spaces: 0 spaces for buildings less than 250 m² 1 spaces for buildings between 250 m² and 2,500 m² 2 spaces for buildings greater than 2,500 m² and less than 5,000 m² 3 + 1 additional space for each 10,000 m² in excess of 5,000 m² for buildings greater than 5,000 m²

PARKING STALL DIMENSIONS	STANDARD: 3.0 m x 6.0 m BARRIER-FREE : 3.6 m x 6.0 m LOADING SPACE: 3.5 x 10m	
	PROPOSED	REQUIRED
BUILDING 1	147	147
BUILDING 2	149	147
BUILDING 3	149	147
BUILDING 4	140	120
BUILDING 5	140	120
BUILDING 6	138	113
RETAIL STORE	1478	755
GAS PUMP	13	12
TOTAL NO. OF PARKING SPACES	2354	1561
REQ. BARRIER-FREE PARKING SPACES (BUILDING 1)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 2)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 3)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 4)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 5)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 6)	7	7
REQ. BARRIER-FREE PARKING SPACES (RETAIL STORE)	38	38
REQ. LOADING SPACES (BUILDING 1)	46	4
REQ. LOADING SPACES (BUILDING 2)	46	4
REQ. LOADING SPACES (BUILDING 3)	46	4
REQ. LOADING SPACES (BUILDING 4)	11	4
REQ. LOADING SPACES (BUILDING 5)	11	4
REQ. LOADING SPACES (BUILDING 6)	11	4
REQ. LOADING SPACES (RETAIL STORE)	4	4
REQ. BICYCLE SPACES (BUILDING 1)	32	32
REQ. BICYCLE SPACES (BUILDING 2)	32	32
REQ. BICYCLE SPACES (BUILDING 3)	32	32
REQ. BICYCLE SPACES (BUILDING 4)	22	21
REQ. BICYCLE SPACES (BUILDING 5)	22	21
REQ. BICYCLE SPACES (BUILDING 6)	20	20
REQ. BICYCLE SPACES (RETAIL STORE)	18	15



1:2000
0 20m 50m 100m 200m

NORTH

TOWNSHIP OF PUSLINCH est. 1850

scheme: 06 (Plan A)

Conceptual Site Plan A

Townline
2809 Townline Road, Puslinch, Ontario

WARE MALCOMB

TOR25-0087-00
01.28.2026

SHEET
1

ZONING MATRIX		
LEGAL NAME: PART LOT 1, CONCESSION 2, PUSLINCH, PARTS 1, 2 & 3 61R2992 AND AS IN ROS257095 SOUTH OF MS47320; EXCEPT PART 2 61R642, PART 1 61R6501, PARTS 1 & 2 61R2843, PARTS 1, 2, 3, 5, 6, 7 & 8 61R9198, PART 1 61R9263, PART 1 61R9689 AND PART 1 EXPROPRIATION PLAN WC505537; T/W RO693735; TOWNSHIP OF PUSLINCH		
ITEM	**PROPOSAL**	**EXISTING**
ZONING CATEGORY	INDUSTRIAL (IND)	AGRICULTURAL (A)
GROSS SITE AREA (m²)	337,346 m2 (33.7ha)	
TOTAL GROSS FLOOR AREA (m²)	118288.00	N/A
	PROPOSED	**REQUIRED**
MINIMUM REQUIRED LOT AREA (HA)	33.7	0.4
MINIMUM REQUIREDLOT FRONTAGE (m)	752	30
MINIMUM REQUIRED FRONT YARD (m)	41	6
MINIMUM REQUIRED INTERIOR SIDE YARD SETBACK (m)	36	5
INTERIOR SIDE YARD ADAJCENT TO RESIDENTIAL ZONE (m)	N/A	15
MINIMUM REQUIRED EXTERIOR SIDEYARD (m)	55	15
MINIMUM REQUIRED REAR YARD (m)	47	7.5
REAR YARD ADAJCENT TO RESIDENTIAL ZONE (m)	N/A	15
MAXIMUM PERMITTED LOT COVERAGE (%)	35%	75%
MINIMUM REQUIRED LANDSCAPED OPEN SPACE	17%	15%
MAXIMUM PERMITTED BUILDING HEIGHT (m)	25	25
BUFFER IF ADJACENT TO RESIDENTIAL ZONE (m)	N/A	1.5
MTO SETBACK (m)	14	14
BUILDING FLOOR AREA		
BUILDING 1	**m2**	
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
BUILDING 2		
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
BUILDING 3		
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
BUILDING 4		
INDUSTRIAL	9,384.00	
(10%) OFFICE	1,043.00	
TOTAL	10,427.00	
BUILDING 5		
INDUSTRIAL	9,384.00	
(10%) OFFICE	1,043.00	
TOTAL	10,427.00	
BUILDING 6		
INDUSTRIAL	8,833.00	
(10%) OFFICE	981.00	
TOTAL	9,814.00	
BUILDING 7		
INDUSTRIAL	18,534.50	
(5%) OFFICE	975.50	
TOTAL	19,510.00	
BUILDING 8		
INDUSTRIAL	18,534.50	
(5%) OFFICE	975.50	
TOTAL	19,510.00	
TOTAL AREA	118,288.00	

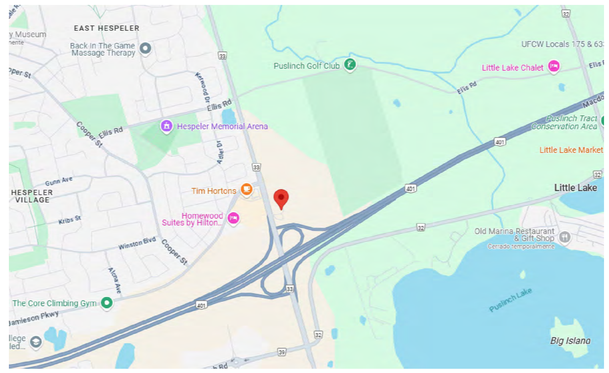
PARKING REQUIREMENT

Building 1-6:
Parking stall ratio: 1/100 m² for the first 10,000 m² of floor area and 1/200 m² for any floor area after the first 10,000 m²
Business/Professional Office: 1/40 m²
Bicycle space (0.6X1.8m) ratio: 2/1000 m2 for industrial uses

Barrier-free stalls:
1 stall if the total number of parking stalls is between 3 and 25 stalls.
1 stall + 3% if the total number of parking stalls is between 26 and 100 stalls.
4 stalls + 2% if the total number of parking stalls is between 101 and 200 stalls.
8 stalls + 2% if the total number of parking stalls is equal to or greater than 201 stalls

Loading Spaces:
0 spaces for buildings less than 250 m²
1 spaces for buildings between 250 m² and 2,500 m²
2 spaces for buildings greater than 2,500 m² and less than 5,000 m²
3 + 1 additional space for each 10,000 m² in excess of 5,000 m² for buildings greater than 5,000 m²

PARKING STALL DIMENSIONS	STANDARD: 3.0 m x 6.0 m BARRIER-FREE : 3.6 m x 6.0 m LOADING SPACE: 3.5 x 10m	
	PROPOSED	**REQUIRED**
BUILDING 1	147	147
BUILDING 2	149	147
BUILDING 3	149	147
BUILDING 4	140	120
BUILDING 5	140	120
BUILDING 6	138	113
BUILDING 7	188	167
BUILDING 8	189	167
TOTAL NO. OF PARKING SPACES	1240	1128
REQ. BARRIER-FREE PARKING SPACES (BUILDING 1)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 2)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 3)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 4)	6	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 5)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 6)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 7)	9	8
REQ. BARRIER-FREE PARKING SPACES (BUILDING 8)	8	8
REQ. LOADING SPACES (BUILDING 1)	46	4
REQ. LOADING SPACES (BUILDING 2)	46	4
REQ. LOADING SPACES (BUILDING 3)	46	4
REQ. LOADING SPACES (BUILDING 4)	11	4
REQ. LOADING SPACES (BUILDING 5)	11	4
REQ. LOADING SPACES (BUILDING 6)	11	4
REQ. LOADING SPACES (BUILDING 7)	33	4
REQ. LOADING SPACES (BUILDING 8)	33	4
REQ. BICYCLE SPACES (BUILDING 1)	32	32
REQ. BICYCLE SPACES (BUILDING 2)	32	32
REQ. BICYCLE SPACES (BUILDING 3)	32	32
REQ. BICYCLE SPACES (BUILDING 4)	22	21
REQ. BICYCLE SPACES (BUILDING 5)	22	21
REQ. BICYCLE SPACES (BUILDING 6)	20	20
REQ. BICYCLE SPACES (BUILDING 7)	40	39
REQ. BICYCLE SPACES (BUILDING 8	40	39



1:2000
0 20m 50m 100m 200m

NORTH

TOWNSHIP OF PUSLINCH
est. 1850

scheme: 07 (Plan B)

Conceptual Site Plan B

Townline
2809 Townline Road, Puslinch, Ontario

WARE MALCOMB

TOR25-0087-00
01-28-2026

SHEET
1

E

Appendix E: MDS Report

Minimum Distance Separation Report

2809 Townline Road
Township of Puslinch

PREPARED FOR:
Fieldgate Properties Ltd.

November 14, 2025

Your Vision

Designed | Planned | Realized

MHBC - MacNaughton Hermsen Britton Clarkson Planning Limited
200-540 Bingemans Centre Drive Kitchener, ON N2B 3X9
T: 519 576 3650
F: 519 576 0121
www.mhbcplan.com

MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

Contents

Figures

Tables

Appendix

1.0 Introduction

MacNaughton Hermsen Britton Clarkson Planning Limited (hereinafter "MHBC") has been retained by Fieldgate Properties Limited to provide Minimum Distance Separation (MDS) Report in support of a Zoning By-law Amendment - Town of Puslinch and Official Plan Amendment application with the County of Wellington. The subject lands are located at 2809 Townline Road, Puslinch and adjacent to the east side of Townline Road, north of Highway 401, west of Puslinch Golf Club, and south of Ellis Road **(Figure 1).** The purpose of these applications is to redesignate and rezone the lands to create a new industrial lot and facilitates the future developments. There is currently a barn and two dwellings located on the subject lands, all of which are proposed to be demolished.

The subject lands are situated within the Township of Puslinch in Wellington County, specifically on Part of Lot 2, Concession 2. Together, the properties cover an area of approximately 33.7 hectares (83.3 acres), as illustrated in **Figure 1**.

According to the County of Wellington Official Plan (Schedule B7), the subject lands are currently designated as 'Secondary Agricultural'. Under the Township of Puslinch Zoning By-law 023-18, the subject lands are zoned as Agricultural (A).

Figure 1 - Location Map

Subject Lands

Study Area (750m buffer)

Settlement Boundary

2.0 Planning and MDS Guidelines

2.1 Policy Context

Provincial Planning Statement (2024)

The Provincial Planning Statement 2024 requires that developments on rural lands should comply with Minimum Distance Separation (MDS) setbacks. Section 2.6.5 of the PPS states:

> *'New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.'*

Wellington County official Plan

Section 6.5.7 of the Wellington County Official Plan specifies that the Minimum Distance Separation (MDS) formulae will be applied to new land uses, lot creation or expanding livestock facilities within Secondary Agricultural Areas.

Township of Puslinch Zoning By-law 023-18

Section 4.16.1 of Zoning By-law 023-18 outlines the requirements for MDS I setbacks for new non-farm uses. Specifically:

a) *Notwithstanding any other yard or setback provisions of this By-law to the contrary, no residential, institutional, commercial, industrial or recreational use, located on a separate lot and permitted within the Agricultural (A) Zone or any other zone in which agricultural uses are permitted, shall be erected or altered unless it complies with the Minimum Distance Separation I (MDS I) setback from a livestock facility, calculated using the Formulas published by the Province of Ontario, as may be amended from time to time.*

The proposed ZBA and OPA applications will trigger the requirement for a Minimum Distance Separation (MDS) Type I analysis. This requirement is mandated under the Provincial Planning Statement (2024), the Wellington County Official Plan, and the Township of Puslinch Zoning By-law 023-18. The intent of the MDS I formula is to minimize potential land use conflicts between new non-agricultural development and existing livestock operations by ensuring adequate separation distances. As such, prior to the approval of the proposed ZBA, a comprehensive MDS I calculation must be completed to demonstrate that the new land use can be developed in compliance with the prescribed setback requirements. This ensures the protection of agricultural operations from encroachment and supports the long-term viability of agricultural uses in the area.

2.2 Review of Applicable MDS Guidelines

The Minimum Distance Separation Implementation Document: Formulae and Guidelines

Within Rural and Prime Agricultural Areas, new non-farm uses are required to meet the Minimum Distance Separation I ("MDS I") formula as provided in "The Minimum Distance Separation Implementation Document: Formulae and Guidelines for Livestock Facility and Anaerobic Digester Odour Setbacks, Publication 853 of the Ontario Ministry of Agriculture, Food and Agribusiness" ("MDS Guidelines"). The MDS I formulae applies to all existing livestock facilities and empty livestock facilities. An empty livestock facility means a facility that is no longer used to house livestock but appears to be reasonably capable of housing livestock. The MDS I formulae was not applied to facilities that are in poor or deteriorating conditions and determined to not be suitable for housing livestock.

MDS Guidelines #33 and #34 define two types of MDS analyses—Type A and Type B—based on the intensity of human occupancy and activity.

- Type A land uses are characterized by lower human density and limited occupancy, such as industrial uses located outside a settlement area.
- Type B land uses involve higher human density and more permanent habitation, such as new or expanded settlement area boundaries, OPA or ZBA on lands outside a settlement area, excluding industrial uses.

Applicable MDS guidelines for these applications are as follows:

> Guideline #2, *The MDS I setback distances shall be met prior to the approval of: rezonings or re-designations in accordance with Implementation Guideline #10. The information used to carry out an MDS I calculation must reflect the circumstances at the time that the municipality deems the planning or building permit application to be complete.*
>
> Guideline #3, *Certain proposed uses are not reasonably expected to be impacted by existing livestock facilities or anaerobic digesters and as a result, do NOT require an MDS I setback.* Such uses may include, but are not limited to:
>
> - *livestock barns occupying an area less than 10 m^2;*
> - *certain unoccupied livestock barns in accordance with Implementation Guideline #20;*
> - *greenhouses;*
> - *kennels;*
> - *machinery sheds.*
>
> Guideline #6, This guideline speaks to required investigation distances for an MDS analysis. It outlines that '*A separate MDS I setback shall be required to be measured from all existing livestock facilities and anaerobic digesters on lots in the surrounding area that are reasonably expected by an approval authority to be impacted by the proposed application'.* It is clarified that for a Type A land use, all existing livestock facilities or anaerobic digesters within a 750-metre area of the proposed application must be investigated.

Guideline #10, An MDS I setback is required for all proposed amendments to rezone or redesignate land to permit development in prime agricultural areas and rural lands presently zoned or designated for agricultural use.

Guideline #20, The guideline states that all unoccupied livestock barns on a lot should be evaluated in accordance with the implementation of the MDS guidelines, only if the following conditions apply:

- *the building has been deemed by a municipal building official, with input from a professional engineer or a consultant knowledgeable about livestock facilities where appropriate, as no longer being structurally sound or reasonably capable of housing livestock; or*
- *the portion of the lot on which the unoccupied livestock barn is located is zoned such that the building shall not be used for housing livestock; or*
- *the floor area of the unoccupied livestock barn is <100 m2.*

Guideline #33, The guideline states that MDS I applies to Type A land uses, which are characterized by a lower density of human occupancy, habitation, or activity. It also provides examples of proposals that fall within the Type A land use category:

- *industrial uses outside a settlement area;*

Based on our review of the proposed ZBA and OPA applications, the rezoning of the subject lands from Secondary Agricultural to Industrial represents a low-density form of human occupancy and activity. In accordance with the MDS Guidelines, this type of development is considered a Type A land use.

As outlined in the MDS guidelines, Type A land uses require an MDS I analysis, which involves identifying all existing livestock facilities or anaerobic digesters within a 750-metre radius of the subject lands. This analysis ensures compliance with setback requirements and helps prevent potential land use conflicts between agricultural and non-agricultural uses.

3.0 Site Analysis

As part of municipal consideration of planning or building permit applications, all existing livestock facilities anerobic digesters within a 750 meter distance of a proposed Type A land use shall be investigated and MDS I set back calculations undertaken where warranted. In accordance with MDS Guidelines, rezoning in rural area to facilitate future industrial development is considered Type A land use (less sensitive) as this development have a lower density of human occupancy, habitation, or activity which coincides with a lower potential for nuisance complaints.

As a first step, satellite and aerial imagery were used to identify existing livestock facilities within the study area. Subsequently, a roadside site visit was conducted on November 4, 2025, to confirm the presence of livestock operations within a 750-metre area of the subject lands, in accordance with the investigation distance required for Type A land uses under the MDS Guidelines **(Figure 2)**. During the site visit, one livestock operation was identified within the specified distance, as summarized in **Table 1.** The MDS worksheets and figure generated in AgriSuite and AgMaps are included in **Appendix A**.

The factors used to determine the MDS I setback requirements for these facilities include:

- the type of livestock;
- the maximum capacity of the barn for livestock; and
- the type of manure storage.

These factors were determined through interview with farmers **(Appendix B)**, field observations undertaken during roadside visits, and aerial imagery review.

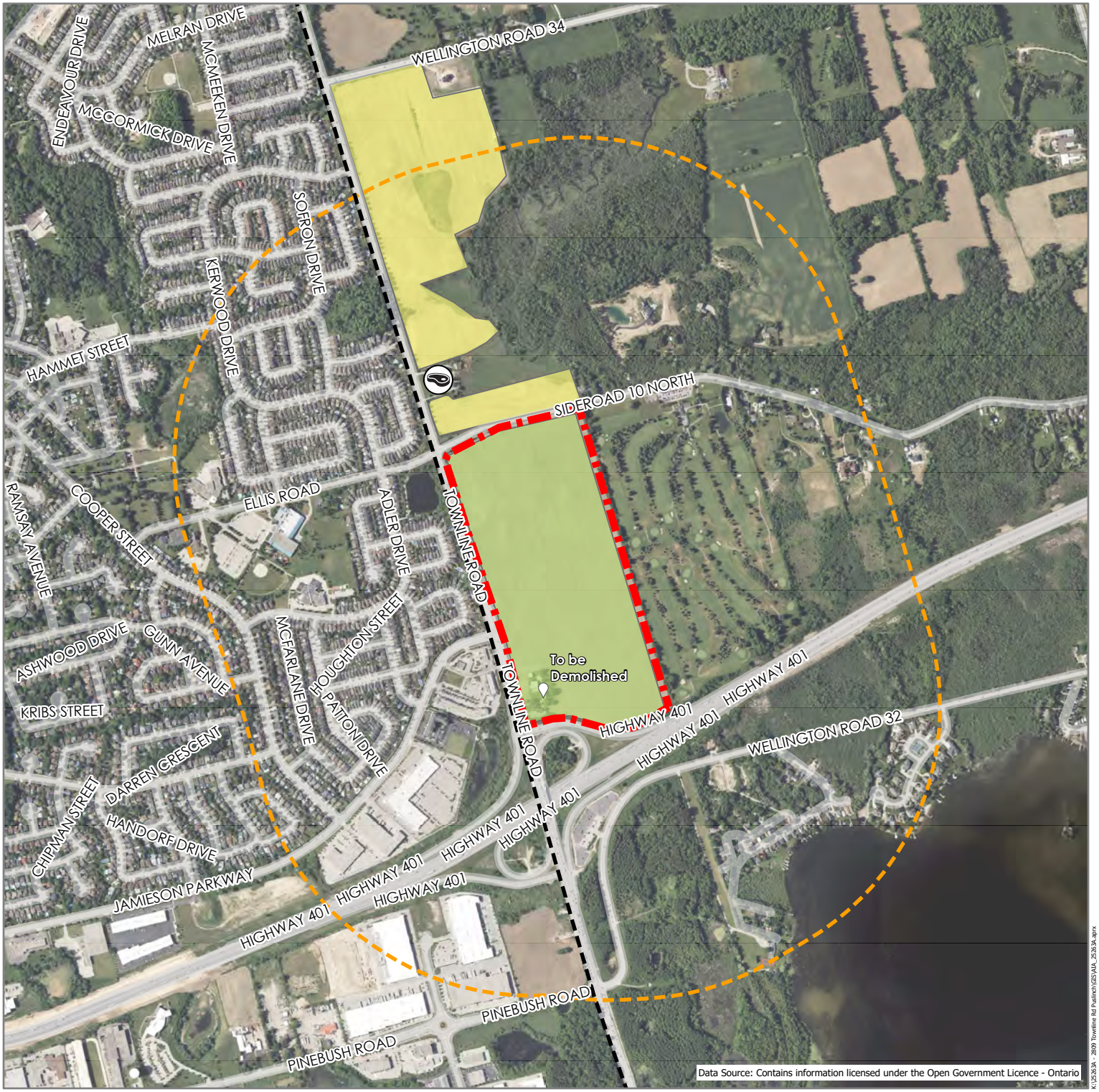


Figure 2 - Agricultural Land Use

- Subject Lands
- Beef cattle ranching and farming, including feedlots
- Corn farming
- Fallow
- Study Area (750m buffer)
- Boundary_of_Municipalities

3367 Townline Road

This farm is approximately 40.46 hectares (100 acres) in size and is located immediately north of the subject lands, making it the closest and only livestock operation to the proposed rezoning area. The property includes one barn and connected sheds, a paddock, residential units, and two storage barns. Based on a roadside site visit and aerial imagery, it is evident that the farmland is used for corn production. Beef cattle were visible during the site visit, and a pasture is connected to the livestock barn. A portion of the farm to the east contains natural features.

This farm is situated at the westernmost edge of the Township of Puslinch, adjacent to the settlement area boundary of the City of Cambridge. West of the farm lies Townline Road, and beyond that is Kerwood Drive, a residential street with detached townhouses.

Livestock Barn at 3367 Townline Road

Table 1. MDS I Summary Table

Address	Livestock Operation Type	MDS	MDS met
3367 Townline Road	Beef Cattle Barn	101 meters	Yes
*Where only one MDS measurement is listed, that measurement applies to both the barn and manure storage (or barn only where there is no manure storage).			

As mentioned above, during the site visit we identified a cattle beef ranch. To determine the number of livestock, we contacted the farm owner and received the signed "Farm Data Sheet" by email. Based on the information provided, we entered the livestock values into the OMAFA AgriSuite platform. The resulting Minimum Distance Separation (MDS) setback is 101 meters.

With the current setback, the livestock barn setback does not overlap the property boundary of the subject lands. The MDS I setback calculations for the livestock operation indicate that the proposed ZBA and OPA applications meet the setback requirements and therefore comply with the Minimum Distance Separation (MDS) formulae.

4.0 Conclusions

The subject lands, located within the Township of Puslinch, Wellington County, are situated on Part of Lot 1, Concession 2, encompassing a combined area of approximately 33.7 hectares (83.3 acres). The subject lands are designated 'Secondary Agricultural' in the County of Wellington Official Plan and zoned 'Agricultural (A)' under the Township of Puslinch Zoning By-law 023-18. The proposal involves the redesignation and rezoning of land for industrial purposes, which, under the 2024 Provincial Planning Statement and relevant municipal policies, requires a Minimum Distance Separation (MDS) Type A analysis.

To identify potential constraints, a 750-metre distance area was investigated using satellite imagery and a site visit conducted on November 4, 2025. One livestock operation was identified within this area. The property was assessed in accordance with OMAFA's MDS Guidelines 2, 3, 6, 10, 20, and 33, with specific consideration given to land area, facility type, livestock capacity, calculated MDS setbacks, and actual distances to the subject lands.

The existing livestock operation located at 3367 Townline Road, Puslinch consists of a beef cattle barn, which includes an associated paddock and pasture area. Based on signed "Farm Data Sheet" information and desktop analysis using OMAFA's online AgriSuite tools, the MDS setback for the beef cattle barn has been calculated to be 101 metres. This setback allows future development to be planned outside the influence zone, ensuring compliance with MDS requirements.

The MDS I analysis demonstrates that the proposed rezoning is compatible with surrounding agricultural uses and can meet the intent of provincial and municipal planning policies. The existing livestock operation within 750 metres have been appropriately reviewed, and their setbacks evaluated in accordance with the MDS Guidelines.

Respectfully submitted,

MHBC

Pierre Chauvin, BSc(Agr) MA, MCIP, RPP
Partner

Danial Salari, MSc(Pl), MSc(Agr), A.Ag.
Planner

A

Appendix A: MDS Worksheets & Setback Figure

2809 Townline Rd - MDS I

General information

Application date
Nov 5, 2025

Municipal file number

Proposed application
New or expanding zone or designation for an industrial use outside of a settlement area

Applicant contact information
Peter Mahovlich
Fieldgate Properties Limited
5400 Yonge Street
Suite 300
Toronto, ON
M2N 5R5

Location of subject lands
County of Wellington
Township of Puslinch
PUSLINCH
Concession 2 , Lot 2

Calculations

Farm 1

Farm contact information
Steve White
3367 Townline Rd
Puslinch, ON

Location of existing livestock facility or anaerobic digestor
County of Wellington
Township of Puslinch
PUSLINCH
Concession 1 , Lot 2
Roll number: 2301

Total lot size
100 ac

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Beef, Cows, including calves to weaning (all breeds), Yard/Barn	8	8 NU	400 ft²

Setback summary

Existing manure storage	**V3. Solid, outside, no cover, >= 30% DM**
Design capacity	**8 NU**
Potential design capacity	**16 NU**

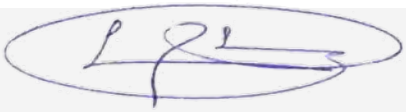
Factor A (odour potential) **0.7**
Factor B (design capacity) **186.66**
Factor D (manure type) **0.7**
Factor E (encroaching land use) **1.1**

Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)	**101 m (331 ft)**
Actual distance from livestock barn	**NA**
Storage base distance 'S' (minimum distance from manure storage)	**101 m (331 ft)**
Actual distance from manure storage	**NA**

Preparer signoff & disclaimer

Preparer contact information
Danial Salari
MHBC Planning
200 - 504 Bingemans Centre Drive
Kitchener, ON
N2B 3X9
dsalari@mhbcplan.com

Signature of preparer



November-14-2025

Danial Salari , Rural Planner

Date (mmm-dd-yyyy)

Note to the user

The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFA) has developed this software program for distribution and use with the Minimum Distance Separation (MDS) Formulae as a public service to assist farmers, consultants, and the general public. This version of the software distributed by OMAFA will be considered to be the official version for purposes of calculating MDS. OMAFA is not responsible for errors due to inaccurate or incorrect data or information; mistakes in calculation; errors arising out of modification of the software, or errors arising out of incorrect inputting of data. All data and calculations should be verified before acting on them.

MDS I Setback

Prepared By:

Danial Salari

Notes:

The MDS setback for the farm located at 3367 Townline Road does not intersect with the boundary of the subject land.

Map Created: 11/14/2025
Map Center: 43.42741 N, -80.28101 W

B

Appendix B: Farm Data Sheet

FARM DATA SHEET
Minimum Distance Separation I (MDSI)

County of Wellington

NOTE TO FARM OWNER(S)
By filling out this form you will help to ensure that new land uses will be located a suitable distance from your livestock operation. Feel free to contact the County Planning office with any questions.

Owner(s) of Livestock Facility Steve White manager of property

Contact Information

Email SteveWhite.ca1963@Gmail.com Telephone 519 502 7777

Civic Address 3367 Townline Rd. Municipality Cambridge / Puslinch

Lot _____ Concession _____ Division _____

Lot Size (where livestock facility is located) _____ hectares 100 acres

Signature of Livestock Facility Owner S White Date Nov. 13 / 25

BARN(S) SIZE Please provide the size of the barns located on the property. This information is used to verify maximum livestock capacity. 2,816 ft²/m² _____ ft²/m²

Manure Storage Types Solid manure: 18% dry matter, or more Liquid manure: <18% dry matter

V1	Solid, inside, bedded pack	L1	Solid, outside, no cover, 18%- <30% dry matter, with uncovered liquid runoff storage
V2	Solid, outside, covered	L2	Liquid, outside, with a permanent floating cover
V3	Solid, outside, no cover, ≥30% dry matter	M1	Liquid, outside, no cover, straight-walled storage
V4	Solid, outside, no cover, 18% - <30% dry matter, with covered liquid runoff storage	M2	Liquid, outside, roof, but with open sides
V5	Liquid, inside, underneath slatted floor	H1	Liquid, outside, no cover, sloped-sided storage
V6	Liquid, outside, with a permanent, tight-fitting cover		

Animal Type of Material	Description	Housing Capacity (maximum)	Manure Storage Type (select from list)
Beef Cattle	Cows, including calves to weaning (all breeds) 8 cows Tottle		V3
	Feeders (7 – 16 months)		
	Backgrounders (7 – 12.5 months)		
	Shortkeepers (12.5 – 17.5 months)		
Dairy Cattle	Milking-age cows (dry or milking)		
	Large-framed; 545 – 658 kg (e.g. Holsteins)		
	Medium-framed; 455 – 545 kg (e.g. Guernseys)		
	Small-framed; 364 – 455 kg (e.g. Jerseys)		
	Heifers (5 months to freshening)		
	Large-framed; 182 – 545 kg (e.g. Holsteins)		
	Medium-framed; 148 – 455 kg (e.g. Guernseys)		
	Small-framed; 125 – 364 kg (e.g. Jerseys)		
	Calves (0 – 5 months)		
	Large-framed; 45 – 182 kg (e.g. Holsteins)		
	Medium-framed; 39 – 148 kg (e.g. Guernseys)		
	Small-framed; 30 – 125 kg (e.g. Jerseys)		
Horses	Large-framed, mature; >681 kg (e.g. draft or draft cross breeds including unweaned offspring)		
	Medium-framed, mature; 227 – 680 kg (e.g. saddle, riding and racing breeds including unweaned offspring)		
	Small-framed, mature; <227 kg (e.g. ponies and miniatures including unweaned offspring)		

FARM DATA SHEET (continued)
Minimum Distance Separation I (MDSI)

County of Wellington

Animal Type of Material	Description	Housing Capacity (maximum)	Manure Storage Type (select from list)
Swine	Sows with litter, dry sows or boars		
	Breeder gilts (entire barn designed specifically for this purpose)		
	Weaners (7 – 27 kg)		
	Feeders (27 – 136 kg)		
Sheep	Ewes & rams (for meat lambs; includes unweaned offspring & replacements)		
	Ewes & rams (dairy operation; includes unweaned offspring & replacements)		
	Lambs (dairy or feeder lambs)		
Goats	Does & bucks (for meat kids; includes unweaned offspring and replacements)		
	Does & bucks (for dairy; includes unweaned offspring & replacements)		
	Kids (dairy or feeder kids)		
Chickens	Layer hens (for eating eggs; after transfer from pullet barn)		
	Layer pullets (day-olds until transferred into layer barn)		
	Broiler breeder growers (males/females transferred out to layer barn)		
	Broiler breeder layers (males/females transferred in from grower barn)		
	Broilers on any length of cycle		
Turkeys	Turkey poults (day-old until transferred to grow out turkey barn)		
	Turkey breeder layers (males/females transferred in from grower barn)		
	Breeder toms		
	Broilers (day-olds to 6.2 kg)		
	Hens (day-olds up to 6.2 to 10.8 kg; 7.5 kg is typical)		
	Toms (day-olds to over 10.8 to 20 kg; 14.5 kg is typical)		
	Turkeys at any other weights, or if unknown (by floor area)		
Veal	Milk-fed		
	Grain-fed		
Other	Please refer to Factor Table 1 of The Minimum Distance Separation (MDS) Document for complete list of animal types		
Imported manure	Use the volume of the manure storages		
Unoccupied livestock barns	A livestock barn that does not currently house any livestock, but that housed livestock in the past and continues to be structurally sound and reasonably capable of housing livestock.*		

*NOTE: This should only be used where obtaining information from the farm operator(s) and/or owner(s) was not possible (see Implementation Guideline 20 for more information).

QUESTIONS?
PLEASE CONTACT

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