



Minimum Distance Separation Report

2809 Townline Road
Township of Puslinch

PREPARED FOR:
Fieldgate Properties Ltd.

November 14, 2025



PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

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

Contents

1.0	Introduction.....	3
2.0	Planning and MDS Guidelines	5
2.1	Policy Context	5
2.2	Review of Applicable MDS Guidelines	6
3.0	Site Analysis	8
4.0	Conclusions	12

Figures

Figure 1 Location Map

Figure 2 Agricultural Land Use Map

Tables

Table 1 MDS I Summary Table

Appendix

Appendix A MDS Worksheets and Setback Figures

Appendix B Farm Data Sheet

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 m²;*
- *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

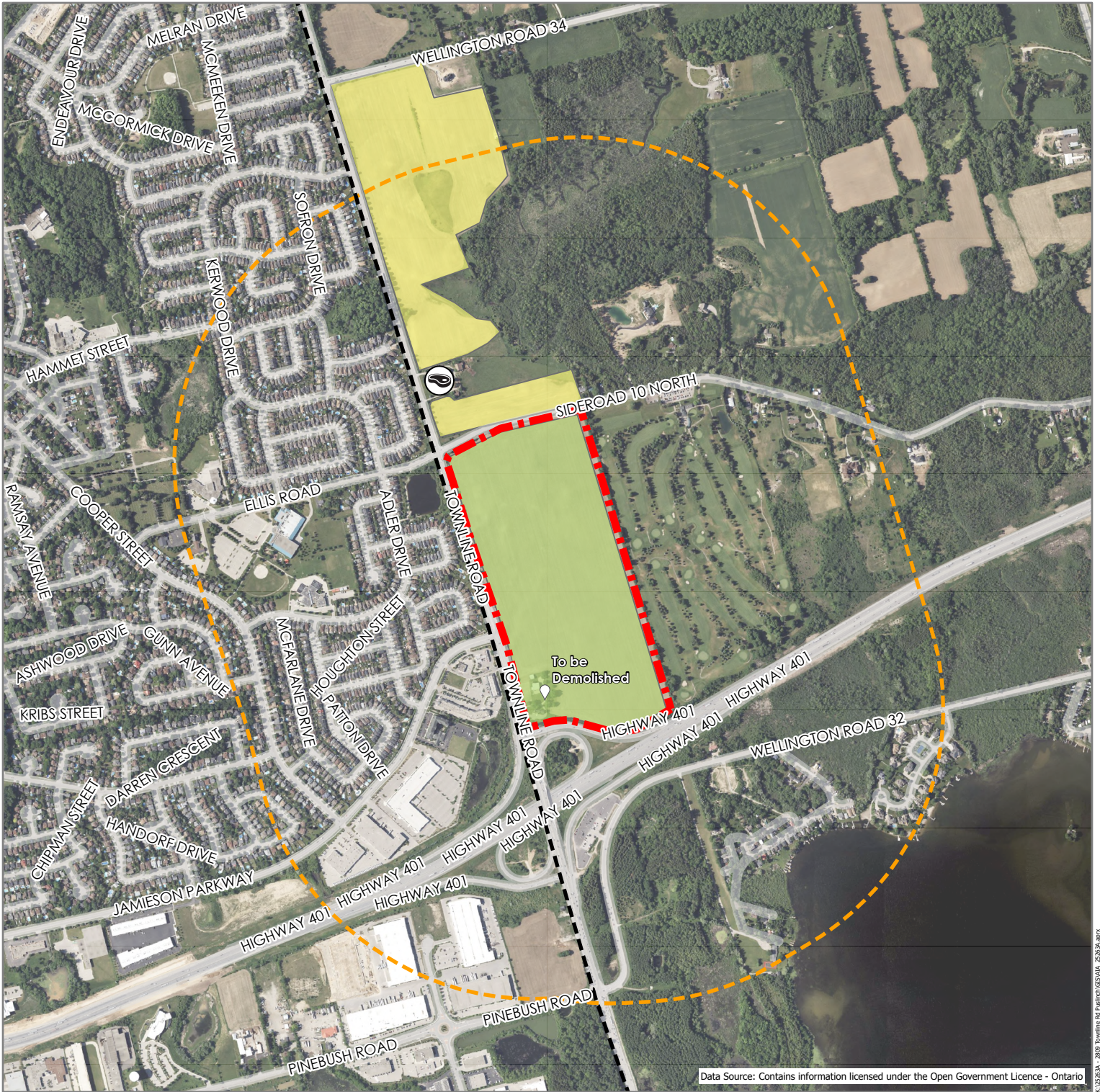
As part of municipal consideration of planning or building permit applications, all existing livestock facilities and anaerobic digesters within a 750 meter distance of a proposed Type A land use shall be investigated and MDS I setback calculations undertaken where warranted. In accordance with MDS Guidelines, rezoning in rural area to facilitate future industrial development is considered Type A land use (less sensitive) as this development has 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.



Data Source: Contains information licensed under the Open Government Licence - Ontario

Figure 2 - Agricultural Land Use

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



K:\2023\24 - 2809 Townline Rd.Plan\GIS\DATA_2523\A.aprx

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.

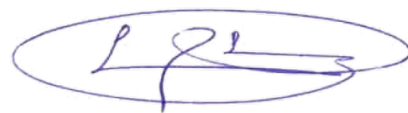
The MDS I analysis demonstrates that the proposed rezoning is compatible with surrounding agricultural uses and can meet the intent of provincial and municipal planning policies. The existing livestock operation within 750 metres have been appropriately reviewed, and their setbacks evaluated in accordance 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 digester
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 <u>NU</u>	400 <u>ft²</u>

Setback summary

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

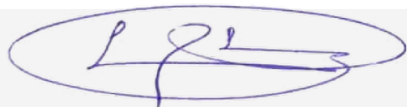
Actual distance from manure storage NA

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



Danial Salari , Rural Planner

November-14-2025

Date (mmm-dd-yyyy)

Note to the user

The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA) 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 OMAFRA will be considered to be the official version for purposes of calculating MDS. OMAFRA 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.

© King's Printer for Ontario, 2012-25

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.

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 Towline Rd. Municipality Cambridge/Pushkinch
 Lot _____ Concession _____ Division _____
 Lot Size (where livestock facility is located) _____ hectares 100 acres

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

Animal Type of Material	Description	Housing Capacity (maximum)	Manure Storage Type (select from list)
Beef Cattle	Cows, including calves to weaning (all breeds) <u>8 cows Total</u>		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**

County of Wellington
Planning and Development Department
74 Woolwich Street, Guelph
ON N1H 3T9

P 519.837.2600 x2170
F 519.923.1694