



MEMO

To:	Peter Mahovlich
From:	Pierre Chauvin and Danial Salari
Date:	August 25, 2026
File:	25263A
Subject:	Response to Comment received regarding the Agricultural Impact Assessment

This memo has been prepared to respond to comments received on August 6, 2026 with respect to the Agricultural Impact Assessment. One remaining comment is addressed below:

Alternative Location Analysis

The subject lands exhibit characteristics of a higher-priority agricultural area, with the lands predominantly consisting of Canada Land Inventory (CLI) Class 3 soils. Further, Section 4.3.2 of the Wellington County Official Plan establishes that agriculture remains the predominant use within Secondary Agricultural Areas. Section 4.6.5.1 of the County of Wellington Official Plan requires development proposed in secondary agricultural areas to provide an assessment that discusses the opportunity to use lands of lower agricultural potential. The applicant should provide additional discussion of whether lands with lower agricultural potential within the surrounding area or within a settlement boundary have been explored to accommodate the proposed development as per Policy 4.6.5.1 a) of the County Official Plan.

Policy 4.6.5.1(a) of the Wellington County Official Plan states:

"4.6.5.1 Rural Development in Prime or Secondary Agricultural Areas Where development is proposed in prime or secondary agricultural areas, 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;"

The County Official Plan permits a broader range of uses in Secondary Agricultural Areas than in Prime Agricultural Areas, while still promoting and protecting normal farm practices. This policy structure recognizes that Secondary Agricultural Areas continue to have agricultural value but may also accommodate certain non-agricultural uses where appropriate.



The subject lands are designated Secondary Agricultural Area and are located at the interface of transportation, recreational, and urban land uses. Highway 401 forms a major transportation corridor immediately to the south; an existing golf course/recreational use is located to the east; and the residential/urban area of the City of Cambridge located to the west.

To assess the agricultural priority of the subject lands, an alternative location analysis was conducted. The first step in this analysis is to establish a set of criteria for identifying suitable alternative lands for the intended use. The criteria outlined in the *Puslinch By Design* framework have been modified and used to identify and evaluate potential alternative locations. These criteria are as follows:

- Accessibility to transportation infrastructure with immediate access/exposure to Highway 401;
- Sufficient developable land area (min. of 30 hectares);
- Minimum Distance Separation (MDS) Compliance;
- Greenlands System Avoidance and Natural Heritage Protection;
- Avoidance of Mineral Aggregate Resource Areas; and,
- Proximity to Existing Communities.

Based on the criteria outlined above, lands with access to Highway 401 between Brock Road and Townline Road were evaluated, as proximity and access to Highway 401 are the primary considerations for identifying potential employment lands within this area. There are three major interchanges providing access to Highway 401: Brock Road, Highway 6, and Townline Road.

The Brock Road and Highway 401 interchange area has already been evaluated through the *Puslinch By Design* study undertaken by Wellington County and the Township of Puslinch, it was concluded that no available sites were available at this interchange. The Highway 6 and Highway 401 interchange represents another potential location for consideration. However, lands south of this interchange are predominantly utilized for aggregate extraction operations, while lands northeast of the interchange are designated as Core Natural Areas. The lands northwest of the interchange consist of a mix of Secondary Agricultural designation and Core Natural Area. This area has been identified as Alternative Location 1. (see Figure 1)

The third interchange is located at Highway 401 and Townline Road. This area is bounded to the west by the City of Cambridge Settlement Area, Puslinch Lake and additional Core Natural Areas to the south, and the subject lands to the northeast. One additional parcel located north of the subject lands could also be considered as a potential option and has been identified as Alternative Location 2 (see Figure 1).

In seeking locations with Highway 401 exposure that do not contain Prime Agricultural Areas, two alternative locations were identified. However, both alternatives contain Core Natural Areas, resulting in a reduced amount of developable land. In addition, some properties adjacent to

Highway 401 are affected primary and secondary sand and gravel resources of significance (see Figure 2).

While the subject lands represent the only available lands in proximity to a Highway 401 interchange that are free of both Prime Agricultural Areas and Core Natural Areas, the following table provides an assessment of the factors influencing the agricultural priority and overall suitability of the subject lands compared to the identified alternative locations.

	MDS Compliance	Avoidance of Greenlands System	Avoidance of Prime Agricultural Area	Agricultural Investments	Proximity to non-agricultural uses	Avoidance of Sand and gravel Resources
Subject Lands	Yes	Yes	Yes	No	Yes (proximity to Cambridge Settlement Area to the west and Puslinch Golf Club to the east)	Yes
Alternative Location 1	Yes	No	Yes	Yes	Yes (proximity to Core natural Area and existing aggregate operations)	No
Alternative Location 2	Yes	No	Yes	Yes	Yes (proximity to Cambridge Settlement Area)	No
Green indicates areas with a lower agricultural priority, while red indicates areas with a higher agricultural priority for agricultural operations.						

Table 1 – Assessment of Agricultural Priorities

The proposed development on the subject lands is not subject to any MDS constraints. While a small portion of the MDS setback associated with the livestock barn located north of the subject lands extends into the landscaped area of the proposed development, no development is proposed within this setback area. The identified alternative locations are not affected by any MDS setbacks. In addition, both alternative locations contain existing livestock barns that would likely need to be removed should these areas be developed for employment purposes. As a result, there is a direct impact on existing agricultural infrastructure. This is in contrast to the subject lands, which has no agricultural investment or infrastructure on the lands.

The subject lands do not contain any areas designated as part of the Greenlands System. In contrast, both Alternative Location 1 and 2 contain lands designated as Core Natural Areas (see

Figure 1), thus minimizing the amount of development area for the proposed use. Furthermore, the natural features on Alternative Location 1 limit the properties exposure to Highway 401 as well constrain the frontage and access of the property along Wellington Rd 34.

Alternative Location 1 is primarily surrounded by Core Natural Areas, rural residential uses, and aggregate extraction operations. Alternative Location 2 and the subject lands are both located immediately east of the City of Cambridge Settlement Area. Given their proximity to existing urban development, rural residential and non-agricultural uses, and the limited agricultural context of the surrounding lands, the proposed development on subject land or alternative locations would not result in, or contribute to, the fragmentation of agricultural lands, and are thus comparable from a land fragmentation perspective.

Based on this assessment, the subject lands are considered the most suitable and readily available location and are associated with a lower agricultural priority than the identified alternative locations. This opinion recognizes the following:

- The subject lands meet all the siting criteria for the proposed commercial use;
- Alternative locations that have immediate access to the 401 are highly constrained by natural heritage and mineral aggregate resources;
- Selecting one of the alternative locations would result in a direct impact and loss of agricultural infrastructure; and,
- The subject lands are already constrained and limited from an agricultural productivity perspective given its location relative to the established settlement area and abutting non-agricultural uses.

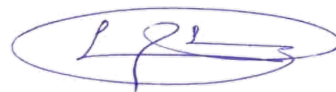
Accordingly, the proposed development is consistent with the policy framework of the Wellington County Official Plan, as it directs development away from Prime Agricultural Areas and toward lands associated with a major transportation corridor. This approach minimizes impacts on agricultural resources while supporting appropriate economic development opportunities.

Yours truly,

MHBC



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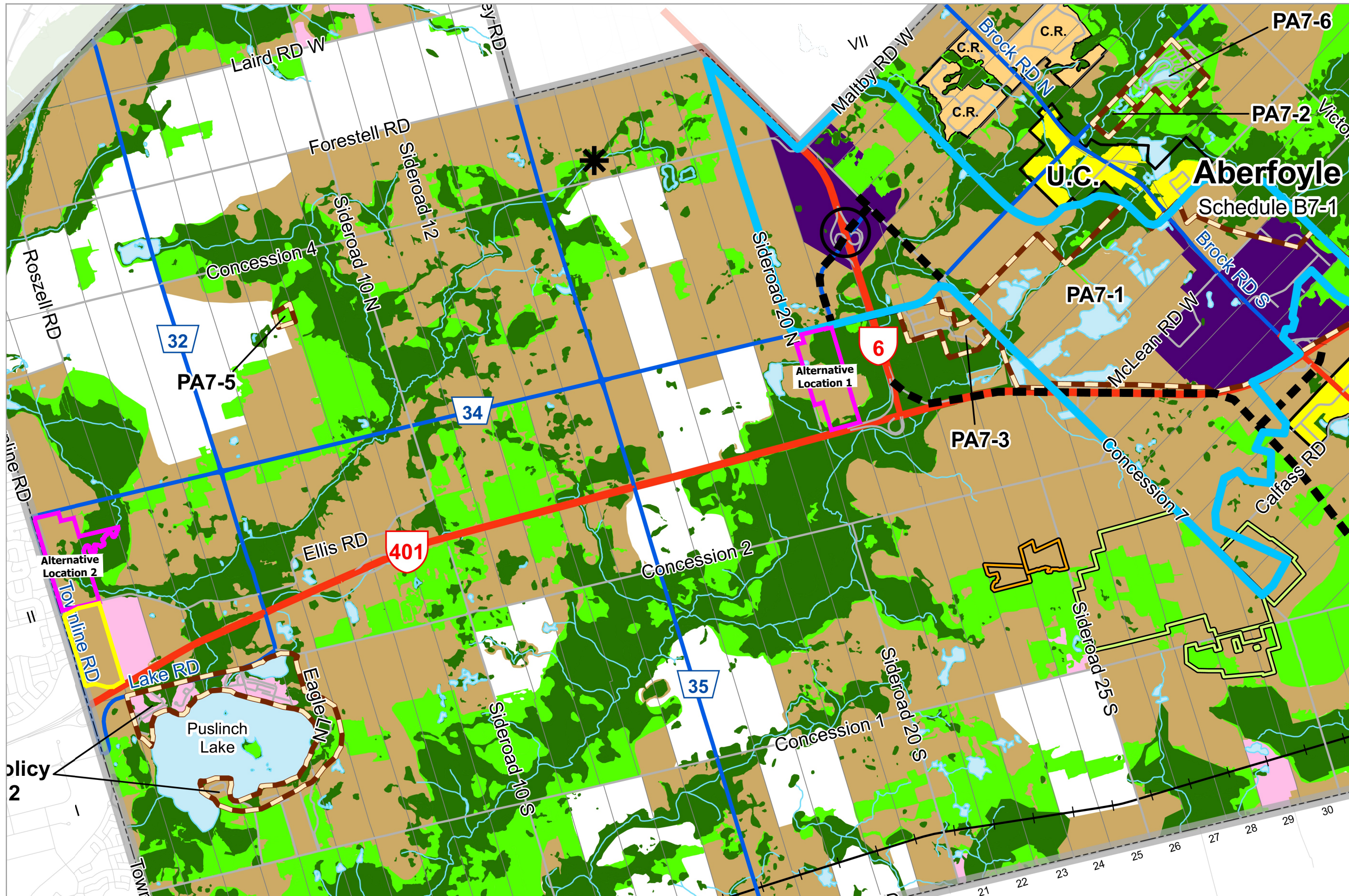


Figure 1 - County of Wellington Official Plan Schedule B7: Land Use

- Subject Lands
 - Alternative Locations
- The Greenlands System**
- Core Greenlands
 - Greenlands
 - Earth Science ANSI
- The Rural System**
- Prime Agricultural
 - Secondary Agricultural
 - H. Hamlet Area
 - U.C. Secondary Urban Centre
 - Mineral Aggregate Area
 - Recreational
 - Rural Employment Area
 - C.R. Country Residential
 - PA Policy Area
 - Regionally Significant Economic Development Study Area
- Other**
- Landfill Site
 - Proposed Interchange
 - Proposed Major Roadways
 - County Roads
 - Provincial Highway
 - Railways
 - Waterbody
 - Watercourse

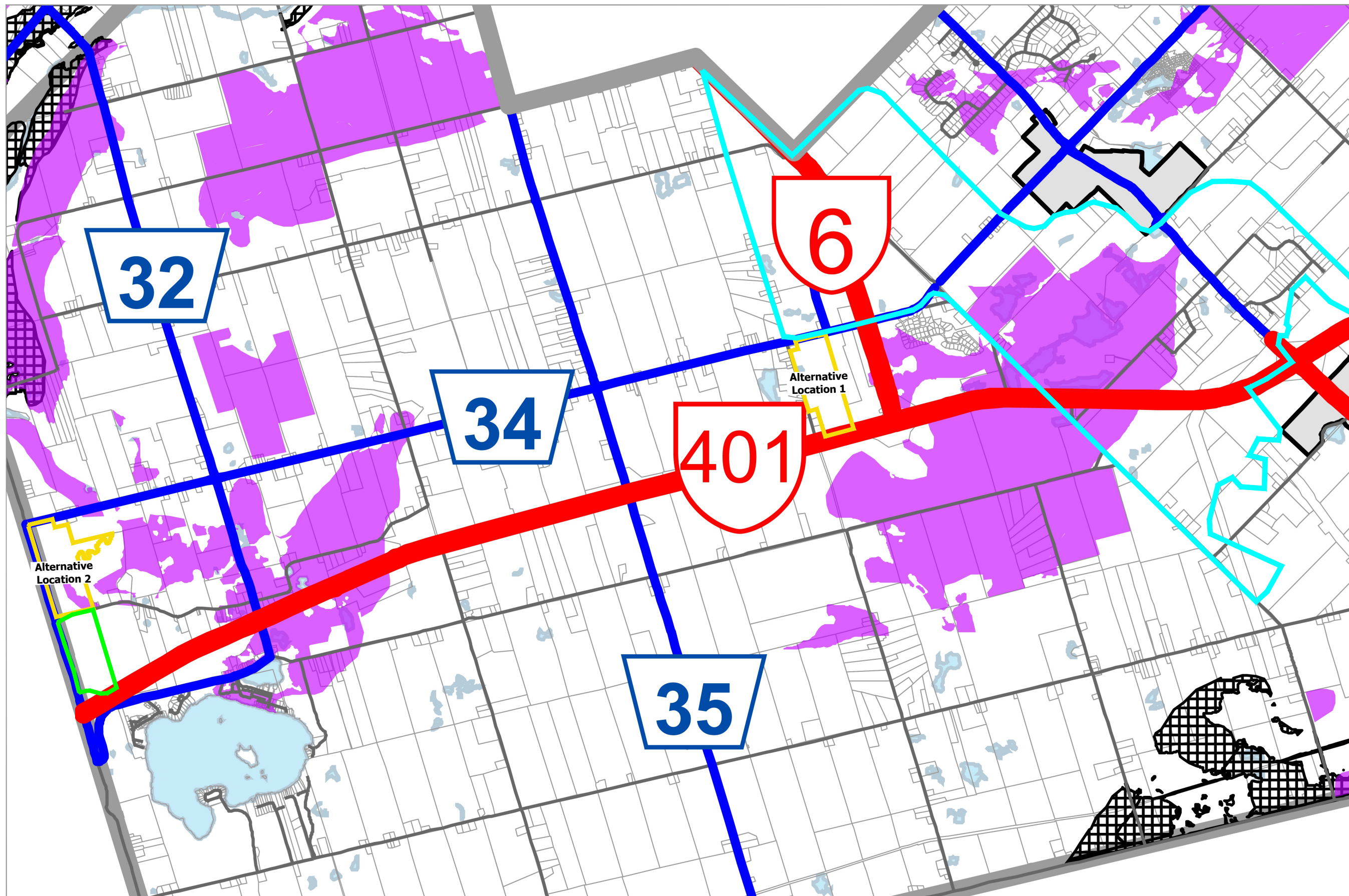


Figure 2 - County of Wellington Official Plan Schedule D: Mineral

-  Subject Lands
-  Alternative Locations
-  Regionally Significant Economic Development Study Area
-  Sand and gravel resources of Primary and Secondary Significance
-  Selected Bedrock Resource Areas

Alternative Location 1

Alternative Location 2

32

34

35

6

401

10

