



MEMO

To:	Peter Mahovlich
From:	Pierre Chauvin and Danial Salari
Date:	July 02, 2026
File:	26253A
Subject:	Response to Comments received regarding the Agricultural Impact Assessment

This memo has been prepared to respond to comments received with respect to the Agricultural Impact Assessment. Two comments were received and are addressed below.

i. The AIA does not include an evaluation of alternative sites with lower agricultural potential, as required by policy 2.3.2.1 (d) of the PPS and policy 4.6.5.1 (a) of the County Official Plan. The Study should assess whether the proposed development can be accommodated on lands with lower agricultural capability and demonstrate that alternative locations have been appropriately considered.

Policy 2.3.2.1(d) of the PPS speaks to new settlement areas and settlement area boundary expansions. This policy is not relevant to the proposed development, as the proposed development is not related to a settlement area boundary expansion. The proposed development is for an industrial use.

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 Wellington County Official Plan defines Secondary Agricultural Areas as *"lands within the Rural System which are determined to be non-prime agricultural areas, but which can sustain certain*



agricultural activities." The Official Plan also recognizes that long-term agricultural potential may be assessed based on factors such as "*Canada Land Inventory capability, farm investment, the nature of agricultural operations, constraints and opportunities for farming, land use patterns, land fragmentation and other matters.*"

The 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 Cambridge is located to the west.

Rather than converting lands within a Prime Agricultural designation, the proposed development is directed to lands within a Secondary Agricultural Area. The subject lands do not contain agricultural investment such as installed tile drainage or farm buildings. In addition, the surrounding non-agricultural uses constrain the potential for agricultural expansion and reduce the long-term flexibility of the lands for more intensive agricultural operations.

While the lands may continue to have some agricultural capability, including CLI Class 2, 3 and 5 soils, their location and surrounding context make them a lower priority for long-term agricultural protection than larger, contiguous areas of Prime Agricultural Area or less-fragmented Secondary Agricultural lands.

The proposed development is therefore consistent with the policy approach of the Official Plan and is directed away from Prime Agricultural Areas and toward a location where the existing land use pattern already reflects a transition between rural/agricultural lands, major transportation infrastructure, recreational land use, and urban/residential development.

ii. MDS I calculations should be revised to reflect the maximum barn capacity rather than the number of cattle currently housed on the property. Using AgriSuite and the barn square footage provided by the farm operator, the barn is estimated to have a maximum design capacity to house up to 56 cows (including calves to weaning). The Study should be updated accordingly, and any associated development setbacks should be incorporated into the draft Official Plan Amendment and draft Zoning By-law accordingly.

Noted.

A new MDS analysis for the beef cattle operation at 3367 Townline Road was completed in response to the comments received. Based on a maximum area capable of accommodating 56 cows, the

updated setbacks from the closest point of the barn/manure storage to the subject lands remain outside the building envelope shown on the proposed site plan. As such, there is no setback overlay or conflict.

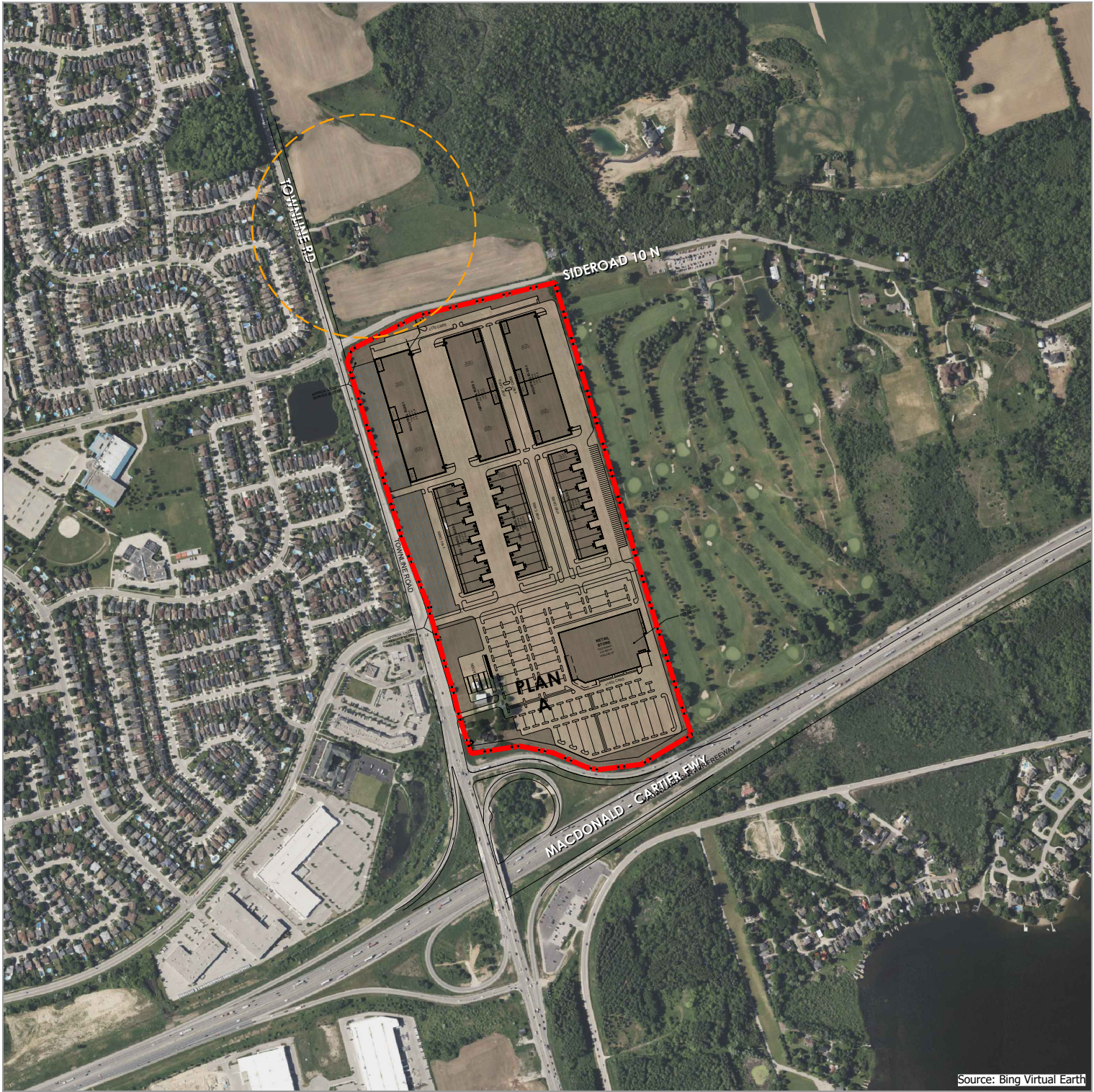
The AgriSuite MDS calculation and MDS figures, which show the setback arc and proposed development, are attached.

The policy analysis and updated MDS calculation address the comments received with respect to the Agricultural Impact Assessment.

Should you have any concerns or questions, we would be pleased to discuss them further.

Yours truly,

MHBC



MDS Separation Setback - Plan A

-  Subject Lands
-  MDS Buffer (205m)





MDS Separation Setback - Plan A

- Subject Lands
- MDS Buffer (205m)



25263 with 56 cows

General information

Application date Jun 23, 2026	Municipal file number	Proposed application New or expanding zone or designation for an industrial use outside of a settlement area
Applicant contact information Peter Mahovich 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 1 Roll number: 2301	

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 2 , Lot 1	Total lot size 100 ac
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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	56	56 NU	2800 ft²

Setback summary

Existing manure storage	V3. Solid, outside, no cover, >= 30% DM		
Design capacity	56 NU		
Potential design capacity	168 NU		
Factor A (odour potential)	0.7	Factor B (design capacity)	378.62
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)			205 m (673 ft)
Actual distance from livestock barn			NA
Storage base distance 'S' (minimum distance from manure storage)			205 m (673 ft)
Actual distance from manure storage			NA

Preparer signoff & disclaimer

Preparer contact information

Danial Salari
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Signature of preparer

07-02-2026

Danial Salari , Rural Planner

Date (Month-Day-Year)

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 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.