Agricultural Impact Assessment

7518 Sideroad 15, Elora Centre Wellington

File no. 2142G

PREPARED FOR:

Elora Sands Developments Inc.

March 2025

Your Vision

Designed | Planned | Realized

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1.0 Introduction

1.1 Overview

MacNaughton Hermsen Britton Clarkson Planning Ltd. (MHBC) has been retained by Elora Sands Developments Inc. (the 'Client') in October 2024 to complete an Agricultural Impact Assessment (AIA) for a proposed settlement area boundary expansion on lands located at 7518 Sideroad 15 (the 'North Parcel') and 6574 Gerrie Rd (the 'South Parcel') and legally described as Lots 16 and 17 Concession 12, Township of Centre Wellington, Wellington County (the 'subject lands'). Elora Sands Development Inc. owns the property at 7518 Sideroad 15, whereas Keating Construction owns 6574 Gerrie Rd. The current intent is to develop these two parcels together as part of a comprehensive residential development.

The North Parcel is approximately 40.14 hectares (99.19 acres) in area and the South Parcel is approximately 37.97 hectares (93.82 acres) in area for a combined size of approximately 78.08 hectares (193.01 acres). The subject lands have frontage on Sideroad 15, Gerrie Road, and Irvine Street. The development proposes approximately 1,250 residential units, as well as 0.73 hectares for seniors housing, and 4.17 hectares of parkland. The proposal seeks to bring the lands within the Elora settlement area.

The subject lands are currently in agricultural use. The North Parcel contains a cultivated field (winter wheat (2024), a barn, a drive shed, and a dwelling. The South Parcel contains a cultivated field (winter wheat, 2024), several livestock barns, a drive shed, a grain silo, and a dwelling. Neither of the livestock building contain livestock. A drain (Municipal Drain No. 1) runs diagonally through the northern corner of the property. The northern corner of both parcels contains agricultural tile drainage (predominantly within the North Parcel). All buildings are proposed to be demolished to accommodate the future development. The concept plan proposes to maintain the municipal drain.

Surrounding land uses generally include agricultural uses and rural residential uses to the north and east with the Elora settlement area boundary located directly to the south and west (see Figure 1). The Fergus settlement area boundary is located approximately 500 metres to the south-east of the subject lands.

Through the County' municipal comprehensive review process, an urban boundary expansion request was made by the owners to include the subject lands within the Elora/Salem settlement area boundary. This report has been prepared to support this request and to be consistent with the Provincial Planning Statement 2024 (PPS) regarding non-agricultural uses in prime agricultural areas and follows the province's Draft Agricultural Impact Assessment Guidelines, released in March 2018 by the Ministry of Agriculture, Food and Rural Affairs.

1.2 Data Collection and Review

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

- Provincial Planning Statement (2024);
- Wellington County Official Plan;
- Township of Centre Wellington Official Plan;
- Township of Centre Wellington Zoning By-law;
- Ontario Ministry of Agriculture, Food, and Agri-business (OMAFA) Draft Agricultural Impact Assessment (AIA) Guidance Document;
- Guidelines for Permitted Uses in Ontario's Prime Agricultural Areas, Publication 851; and,
- British Columbia Ministry of Agriculture's Guide to Edge Planning (2015).

The proposed Site Concept attached as Figure 2 was also reviewed as part of the preparation of this Agricultural Impact Assessment.

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

- 2021, 2016, and 2011 Census of Agriculture for Wellington County;
- Soil data resource information including Ontario Soil Survey reports and mapping, 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;
- 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);
- AgMaps OMAFA;
- Agricultural Systems Portal OMAFA;
- Parcel mapping/fabric of the area; and,
- Agricultural Impact Assessment for Centre Wellington Settlement Area Boundary Expansion (Colville Consulting Inc., 2024).

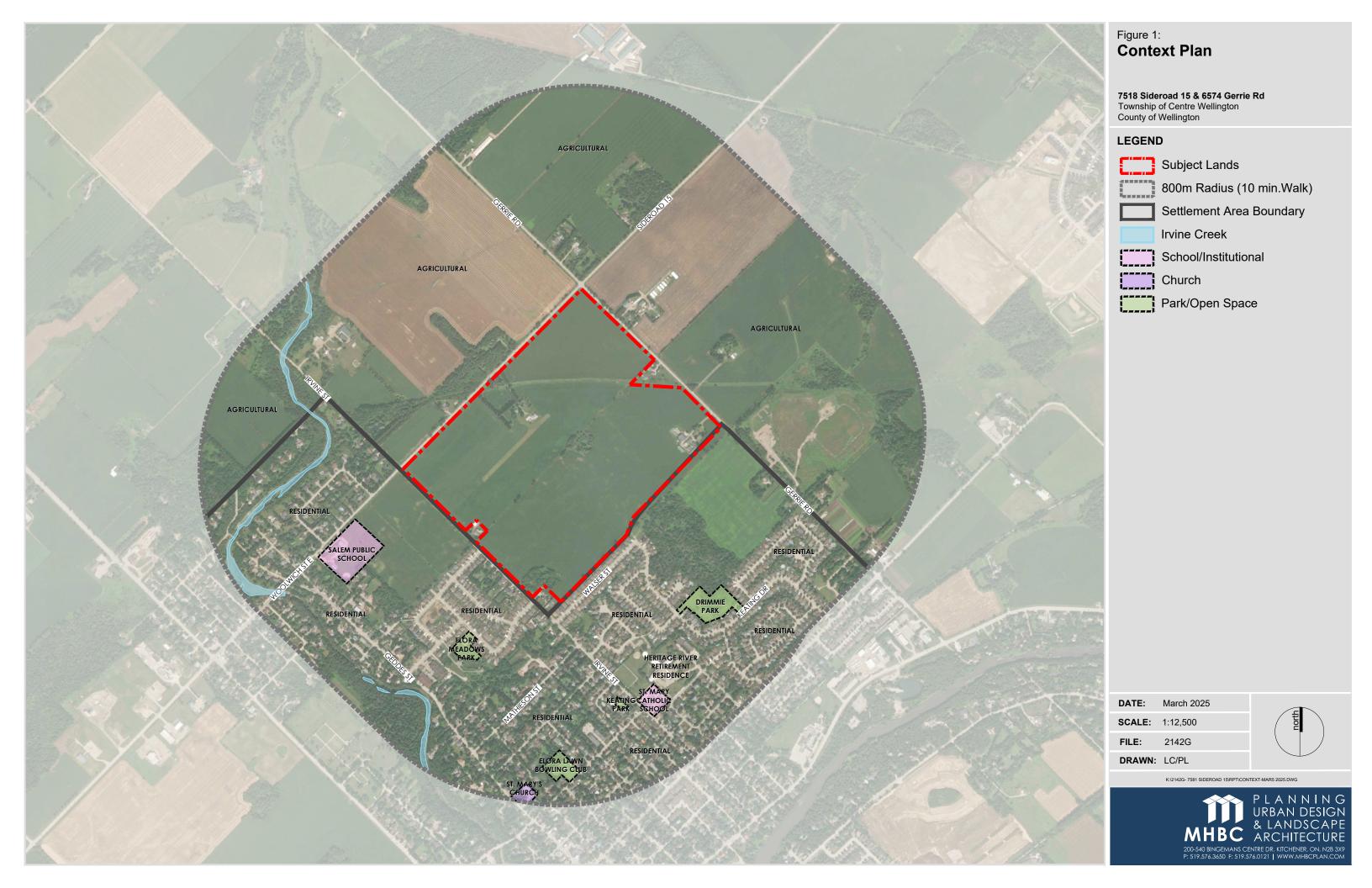
A land use survey was also conducted on November 6th, 2024 with additional information gathered from Google Satellite Imagery and AAFC's 2023 Annual Crop Inventory to gain a better understanding of the agricultural operations and activities in both the primary and secondary study areas. A summary of the land use survey is provided in Section 4.0 of this report. 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.

1.4 Purpose of the Study

The purpose of this Agricultural Impact Assessment is to identify potential impacts on agriculture from the proposed settlement area boundary expansion and development, and to identify mitigation measures to abate these impacts to the extent feasible.

As part of this AIA, surrounding agricultural land uses, operations and structures on properties within 1.5 kilometre of the subject lands have been documented to assess the potential impact from the proposed development on the surrounding agricultural uses/operations and determine the extent of mitigation that may be required.

Baseline information about the soils provides an interpretation of the agricultural capability of the soil to produce various types of crops as well as provide useful information to assess impacts on soil resources.



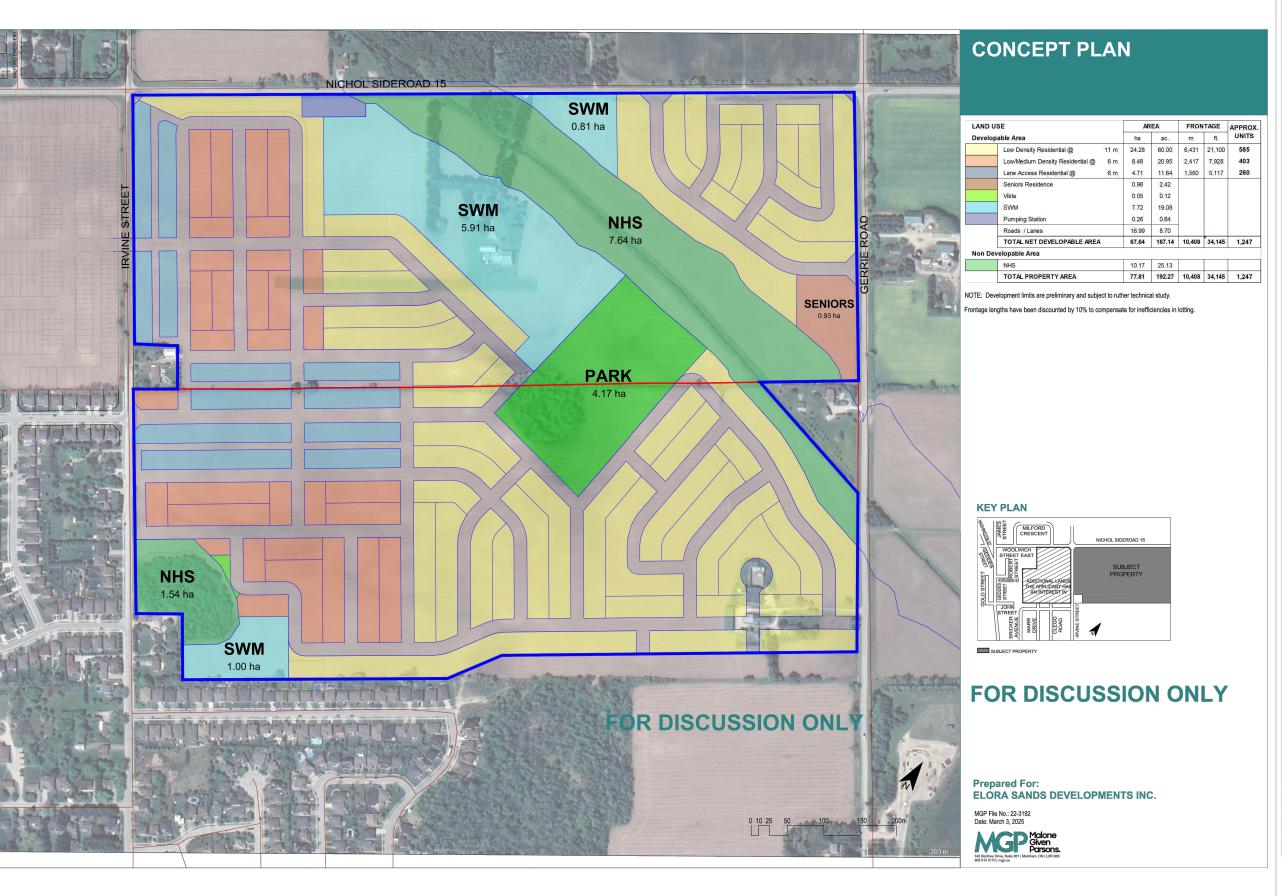


Figure 2:

Concept Plan

7518 Sideroad 15 & 6574 Gerrie RdTownship of Centre Wellington
County of Wellington

LEGEND

Subject Lands

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2.0 Planning Policy **Framework**

Several key documents were reviewed as part of this Agricultural Impact Assessment to provide a comprehensive assessment of the policy framework from an agricultural perspective regarding the proposed development and settlement area boundary expansion. The following is review of the land use policy framework related to the subject lands.

2.1 Provincial Planning Statement, 2024

The Provincial Planning Statement (PPS) 2024 was released on August 20th, 2024, and took effect on October 20th, 2024. The new PPS integrates the 2020 Growth Plan and 2020 Provincial Policy Statement into a single planning document that is applies province wide.

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 settlement area.

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."

Based on a review of Canada Land Inventory mapping, the subject lands contain Class 3 soils (see Figure 3) and, as such, meet the PPS definition of prime agricultural lands. In accordance with Section 2.3.2 of the PPS, Wellington County designates prime agricultural lands within the County as 'Prime Agricultural', and the subject lands are within this designation.

Further, the PPS defines specialty crop areas as:

"areas designated using quidelines 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 lands and surrounding areas have not been identified or designated as a specialty crop area by the province, County or local municipality and neither 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.

Policy 4.3.4 allows planning authorities to exclude land from prime agricultural areas for expansions of or identification of settlement areas only in accordance with policy 2.3.2.

Policy 2.3.2.1 provides that in allowing a settlement area boundary expansion in prime agricultural areas, planning authorities shall consider:

- c) Whether the applicable lands comprise specialty crop areas:
- d) The evaluation of alternative locations which avoid prime agricultural areas, and where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas
- e) Whether the new or expanded settlement area complies with the minimum distance separation formulae:
- f) Whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

Section 3.0 provides an evaluation of the project in the context of the above PPS tests for settlement area boundary expansions in prime agricultural areas.

Further, Policy 2.3.6.2 requires that impacts from any new or expanding non-agricultural uses on surrounding agricultural operations and lands be mitigated to the extent feasible. Section 7.0 of this report provides mitigation measures to help manage the interface of non-agricultural use with surrounding agricultural uses.

2.2 County of Wellington Official Plan

The County of Wellington Official Plan provides direction over the next 20 years to the physical development of the County, its local municipalities and to the long-term protection of County resources.

The County of Wellington Official Plan maps the lands directly west and south of the subject lands as within the Elora/Salem settlement area, with portions adjacent to both the Delineated Built-up Area and the Designated Greenfield Area (Schedule A). The subject lands are designated 'Prime Agricultural' with the municipal drain and adjacent lands designated 'Core Greenlands'; the lands are also currently identified within a Community Planning Area (Schedule B1).

The Elora/Salem settlement area is identified as a 'Primary Urban Centre' in the County Official Plan. Section 4.8 of the Official Plan provides that growth is encouraged to occur in primary urban centres and that build out and eventual expansion of primary urban centres is a logical outcome of this policy direction. Section 4.8.2 provides specific criteria for primary urban centre expansion. With respect to this agricultural impact assessment, the following criteria are relevant:

- prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the County will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following:
 - o reasonable alternatives that avoid prime agricultural areas are evaluated; and;
 - where prime agricultural areas cannot be avoided, lower priority agricultural lands are used;
- any adverse impacts on the agri-food network, including agricultural operations, from expanding settlement areas would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment.

Section 3.0 of this report provides an evaluation of the project in the context of the above assessment criteria for settlement boundary expansion in prime agricultural areas. Section 5.0 and Section 6.0 of this report include an assessment of impact and mitigation measures, respectively.

2.3 Township of Centre Wellington Official Plan

The County is a two-tier government structure with a County government and seven local municipalities. The County Official Plan sets out County-wide overarching land use designations, policies and objectives for growth and development. There are local municipal Official Plans in effect for two of the larger municipalities, including Centre Wellington. The Township of Centre Wellington Official Plan only applies to the Elora and Fergus Urban Centres; the Township Official Plan does not currently apply to the subject lands as they are outside the current settlement area boundaries. Adjacent lands to the south and west are designated 'Residential' (Schedule A-1) within the Township Official Plan.

With respect to urban area expansion in prime agricultural areas, the Township Official Plan reiterates the following criteria (per Section B.5):

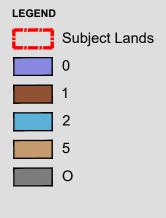
- in prime agricultural areas, there are no reasonable alternatives that avoid prime agricultural areas, and there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;
- impacts on agricultural operations which are adjacent to or close to the urban centre are mitigated to the extent feasible.

Section 3.0 of this report provides an evaluation of the project in the context of the above assessment criteria for settlement boundary expansion in prime agricultural areas. Section 5.0 and Section 6.0 of this report include an assessment of impact and mitigation measures, respectively.





Canada Land Inventory Soils Map



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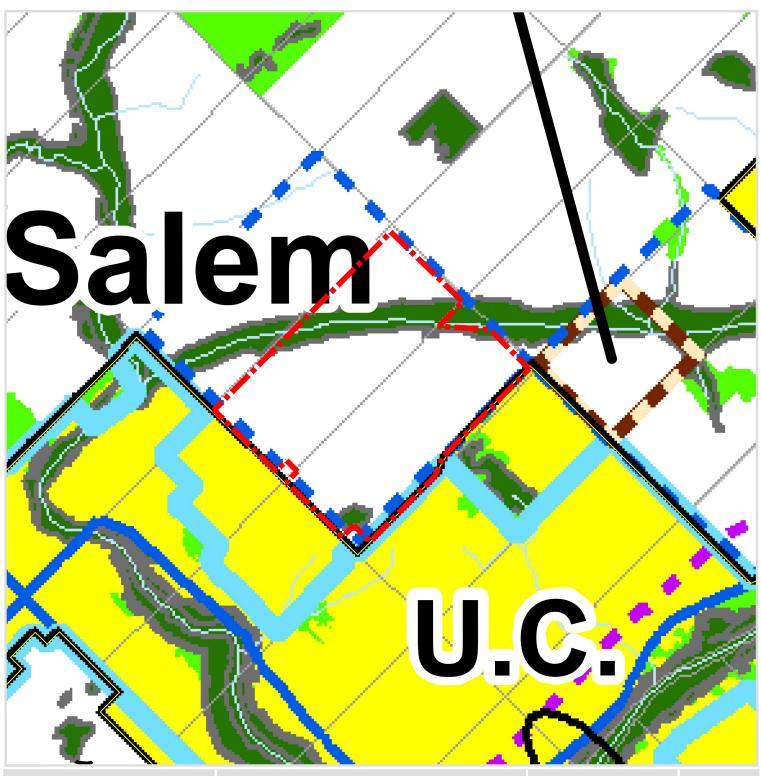


Figure 4:

County of Wellington Official Plan **Schedule B1 Land Use Centre** Wellington

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7518 Sideroad 15 & 6574 Gerrie Rd Township of Centre Wellington County of Wellington

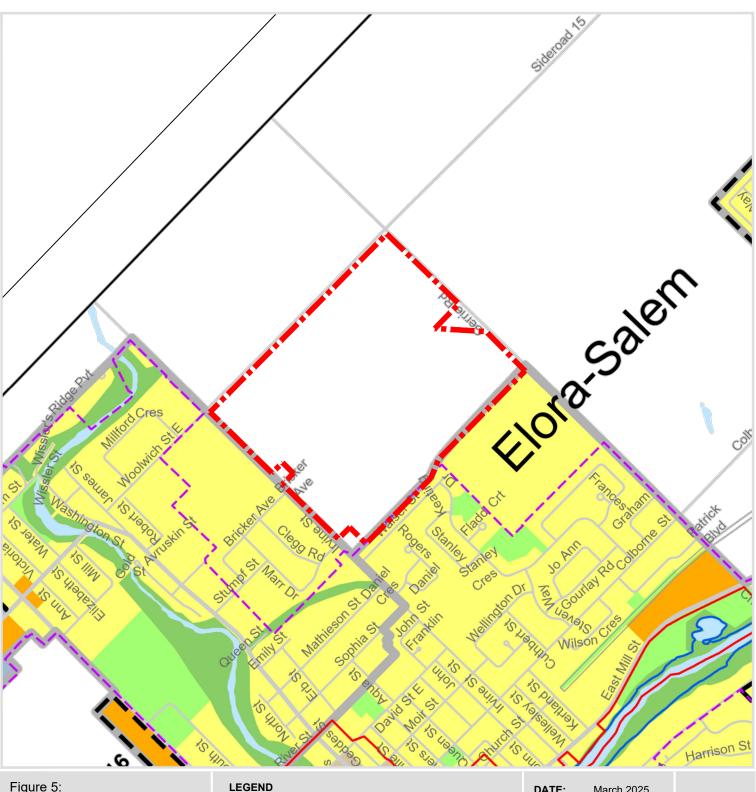


Figure 5:

Township of Centre Wellington Schedule A-1 Land Use Plan Fergus, Elora-Salem



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7518 Sideroad 15 & 6574 Gerrie Rd Township of Centre Wellington County of Wellington

3.0 Focused Study Area

A focused agricultural land assessment was carried out based on a study area comprised of a 'Primary Study Area' and 'Secondary Study Area'. The Primary Study Area is comprised of the subject lands. The Secondary Study Area encompasses a radius of 1.5 kilometers from the subject lands that has the potential to be directly and indirectly impacted by the proposed settlement area expansion.

A plan identifying the adjacent properties, existing crops, and existing barns within the study area is included as **Figure 6** of this report. The inventory of existing agricultural land uses, cropping practices and structures is based on observations made during a site visit completed on November 6th, 2024, review of air photography and AAFC's 2023 Annual Crop Inventory, and input from the current landowner. A review of 2021, 2016, and 2011 Census of Agriculture data was also undertaken to confirm if the Study Areas are representative of agricultural production patterns and livestock types in the broader region.

3.1 Primary Study Area

Based on the Ontario Ministry of Agriculture, Food, and Rural Affairs (OMAFRA) 'Draft Agricultural Impact Assessment (AIA) Guidance Document' (herein referred to as 'OMAFRA AIA Guidelines'), the primary study area when conducting an Agricultural Impact Assessment for a settlement area boundary expansion is the area where expansion is being considered (i.e. the subject lands).

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 gave 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 Indundation 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. 184T²). The numeric superscripts denote the proportion of the area out of a total of 10.

Provincial mapping identifies the subject lands as containing predominantly Canada Land Inventory (CLI) Class 183T² soils with the municipal drain containing Class 2W soil. Class 183T² soils means that 80% of the area is Class 1 and 20% is Class 3T. Class 1 soils have no significant limitations in use for crops. Class 2W soils have moderate limitations that restrict the range of crops or require moderate conservation practices and limitations due to excess water. Class 3T soils have moderately severe limitations that restrict the range of crops or require special conservation practices and limitations due to topography.

Specialty Crop Areas

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 3 of this report, no specialty crop areas are designated by the Province nor the municipality in Wellington County, nor is there evidence of specialty crop production within the primary study area.

Improvements for Agriculture

Agricultural uses within the primary study area consist of typical cash crop production. The northern corner of the subject lands contains agricultural tile drainage. Tile drainage was likely placed in this location to improve soil limitations due to excess water, likely due to proximity to the municipal drain. No other specialized cropping practices or equipment were observed or are documented within the Primary Study Area. Agricultural buildings and structures are present on the lands. The North Parcel contains a barn and drive shed and the South Parcel contains barns, drive sheds, and a silo. Neither of the agricultural structures on these properties are currently used for livestock.

3.2 Secondary Study Area

According to the OMAFRA AIA Guidelines, the secondary study area should include those lands within a 1.5km radius of the area of the expansion. As shown on **Figure 6**, the predominant land use within the secondary study area consists of a mix of agriculture (cash crops and livestock) and urban area (residential, commercial, industrial, and institutional). Lands directly to the south, southeast and southwest are within the Elora settlement area and developed predominantly with low density residential dwellings. Agricultural uses are present to the north, northwest, and northeast. Surrounding crops include winter wheat with evidence of hay, soy, and corn having been present during their growing season (observed as crop stubs during November). A detailed review of livestock operations within the Secondary Study area is included as Appendix A – Secondary Study Area Review.

Based on the site visit, the agricultural lands within the Primary and Secondary Study Areas reflect typical agricultural cropping practices that are predominant throughout southern and central Ontario (soybean/corn rotation, hay production, and wheat production). No specialized cropping practices or equipment were observed or are documented within the Secondary Study Area. No supportive agricultural uses/facilities (e.g. grain storage operations, etc) that support the overall agricultural system were observed within the Secondary Study Area.

There are 4 livestock operation in the Secondary Study Area (see Figure 6). These operations are described in more detail in Appendix A and consist of two beef operations, a dairy operation, and a hobby horse farm. MDS calculations are discussed in Subsection 4.2 of this Report.

Overall, the Secondary Study Area is representative of normal livestock and cropping practices for this area.

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

The 2021, 2016, and 2011 Census of Agriculture and OMAFRA'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. Additionally, North American Industry Classification System (NAICS) data for 2011, 2016, and 2021 were utilized to determine trends in agricultural industry classification (farm types) within the County.

In terms of parcel size, in 2021 most farms (28.4%) were within the 70-129-acre farm size, followed by 23.1% of farms falling in the 69–160-acre range¹. The amount of land in crop production has increased since 2011² from 18,7852 acres to 20,4313 acres in 2021³, representing an increase in cropland of 8.1%.

The most common type of crop production in the County of Wellington is oilseed and grain farming (26.9%), predominantly soybean farming (37.1%), other grain farming (31.0%), corn farming (18.6%), and wheat farming (12.5%)⁴. This industry has grown over the last 10 years with a 46.7% increase in the number of oilseed and grain farms from 2011 to 2021⁵. The next most common farm type in the County is other crop farming which constituted 8.1% of total farms in 2021, 62.3% of which was hay farming, and 27.4% miscellaneous crop farming⁴. Other crop farming has experienced a 16.0% decline in the number of farms over the last 10 years⁵. Overall, the large amount of oilseed and grain farming and identification of several hay fields within the primary and secondary study area is reflective of agricultural patterns throughout the Wellington County.

In terms of livestock, cattle ranching and farming comprised 33.5% of farms (of which 57.4% of farms were beef cattle and 42.6% dairy cattle) in Wellington County⁴. Using these metrics, cattle farming has exhibited a 10.4% increase over the last 10 years⁵. Two cattle farming operations were observed within the study area. Additionally, the subject lands contain a facility previously used for cattle that is proposed to be demolished as part of this application. Other animal farming comprised 12% of farms within the County, primarily horse and other equine production (53.2%) followed by animal combination farming (32.8%)⁴. One animal combination farm (likely a hobby farm) was observed within the study area. Another farm (hobby farm) was observed within the study area with several ponies and horses observed on the property; this farm is separated from the subject lands by the Elora/Salem settlement area.

Based on the site visits, the agricultural activities within the Primary and Secondary Study Areas appear to be indicative of broader agricultural trends in Wellington County. The surrounding crops include typical cash crops such as soybean, corn, and wheat, as well as hay. Surrounding livestock includes dairy cattle, beef cattle, horses, and combination animal farming. Both the Primary and Secondary Study Areas are representative of normal agricultural production for this area and do not consist of specialized farming practices or specialty crops.

3.4 Microclimate for Specialty Crop Production

Climate data was obtained from the OMAFRA 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 (see Image 1 below) 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 2300 near North Bay to over 3500 near Windsor. The higher

¹ Table 32-10-0232-01 Farms classified by total farm area, Census of Agriculture, 2021

² Table 32-10-0406-01 Land use, Census of Agriculture, 2011 and 2016, inactive

³ Table 32-10-0249-01 Land use, Census of Agriculture, 2021

⁴ Table 32-10-0231-01 Farms classified by farm type, Census of Agriculture, 2021

⁵ Table 32-10-0403-01 Farms classified by farm type, Census of Agriculture, 2011 and 2016, inactive

the CHU value, the longer the growing season and greater are the opportunities for growing value crops. The property is located within the 2700-2900 average accumulated Crop Heat Units (CH-MI) and as such, the agricultural lands are not subject to special climatic conditions. Given the typical climatic conditions, there are limited opportunities for growing speciality crops, and therefore, the properties have not been identified as a specialty crop area in the Wellington County Official Plan and do not meet the criteria as identified by the Province.

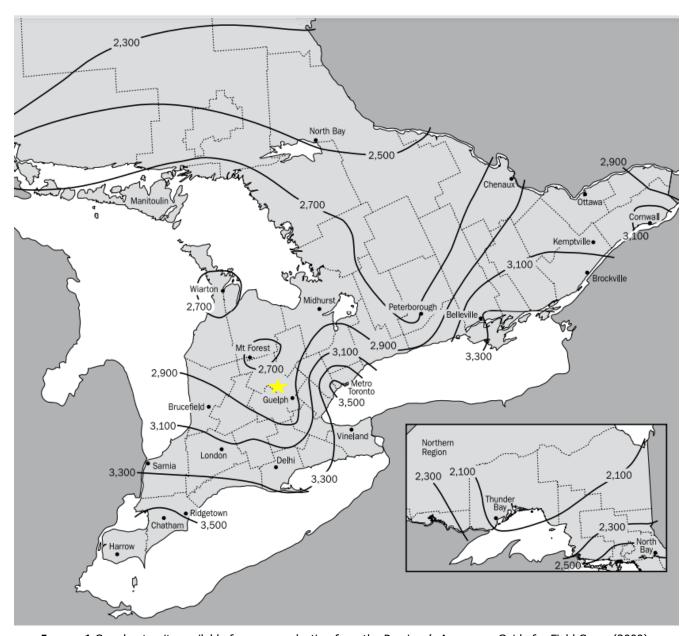
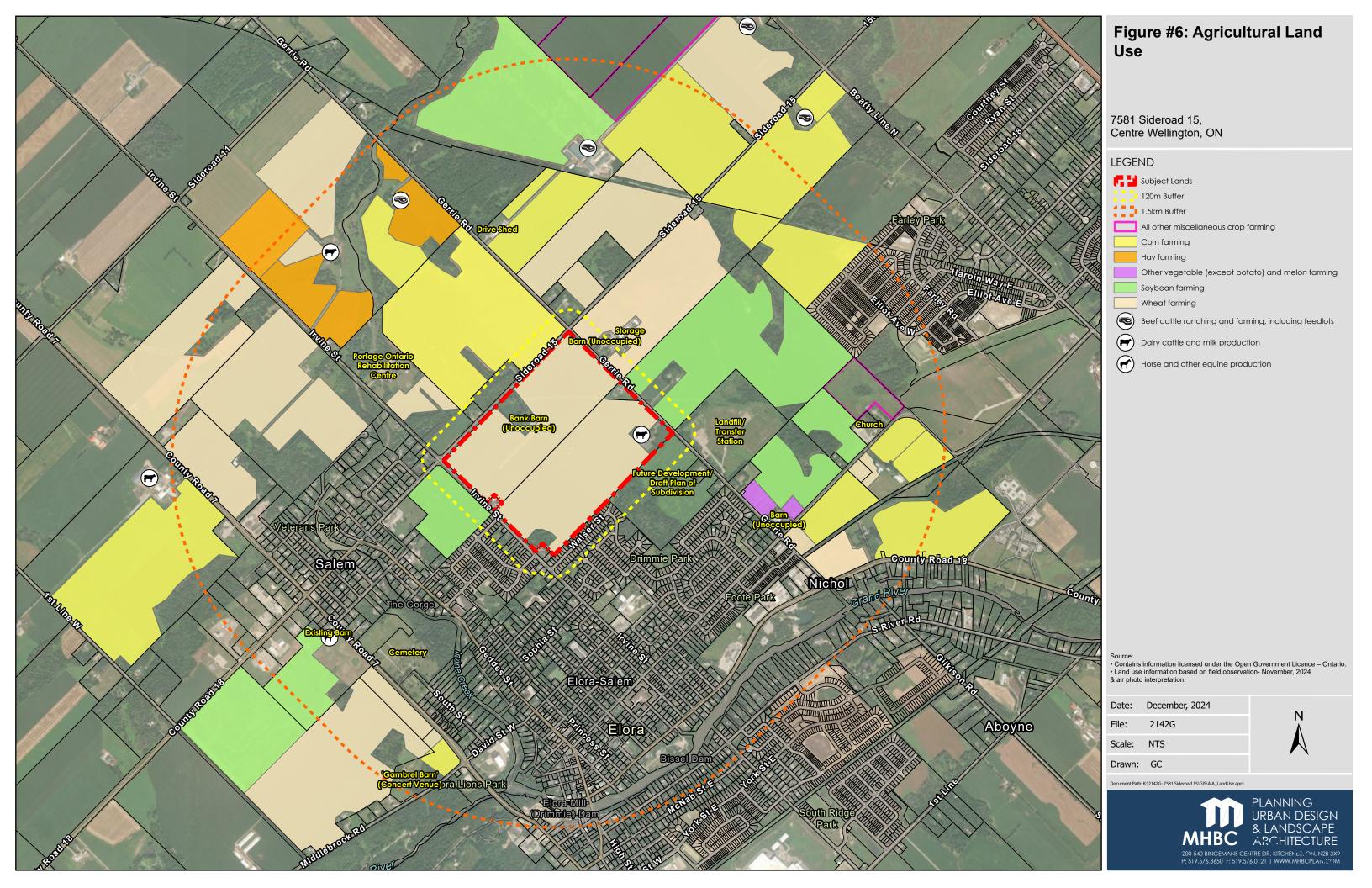


Image 1 Crop heat units available for corn production from the Province's Agronomy Guide for Field Crops (2009).



4.0 Settlement Area **Boundary Expansion in a Prime Agricultural Area**

Consistent with the Provincial Planning Statement 2024, in allowing a settlement area boundary expansion in prime agricultural areas, planning authorities shall consider:

- Whether the applicable lands comprise specialty crop areas;
- The evaluation of alternative locations which avoid prime agricultural areas, and where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;
- Whether the new or expanded settlement area complies with the minimum distance separation formulae:
- Whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

As part of the Township of Centre Wellington's settlement area boundary expansion review, an Agricultural Impact Assessment was prepared by Colville Consulting to assess the consistency of eight potential expansion areas, of which the western half of the subject lands was included, with the above policy tests. This section provides a review of the Township's Agricultural Impact Assessment and evaluation of the proposed settlement area boundary expansion as it relates to an evaluation of alternative locations.

4.1 Specialty Crop Area

As described above, the PPS 2024 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 lands and surrounding areas have not been identified or designated as a specialty crop area by the province or the municipality. The lands also do not exhibit characteristics of a specialty crop production as defined by the PPS. The soils have not been identified to have specific suitability for specialty crops, nor is there a history of specialty crops being grown on the lands. Additionally, while a portion of the lands do contain tile drainage, there is no evidence that this long-term investment of capital was intended for specialty crop production (rather it is likely a method to deal with excess water related to the municipal drain in the northern corner of the site). Accordingly, the subject lands are not within a specialty crop area. In summation, the subject lands do not exhibit any characteristics of a specialty crop area.

4.2 Minimum Distance Separation Formula

The Provincial Planning Statement 2024 requires that expanded settlement area boundaries comply with minimum distance separation (MDS) formula.

Within Rural and Prime Agricultural Areas, new non-farmland 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 Rural Affairs, 2016" ("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.

As part of municipal consideration of planning or building permit applications, all existing livestock facilities or anaerobic digesters within a 1500 metre distance of a proposed Type B land use shall be investigated and MDS 1 setback calculations undertaken where warranted. In accordance with the MDS Guidelines, settlement area expansions are considered a Type B land use (more sensitive) as settlement areas have a higher density of human occupancy, habitation, or activity which coincides with a higher potential for nuisance complaints.

A roadside site visit was conducted on November 6th, 2024, to identify cropping patterns and livestock operations within 1.5 kilometres of the subject lands; the required investigation distance for a Type B land use is 1.5 kilometres (MDS Guidelines). During this site visit, four livestock operations were identified within 1.5 kilometres of the subject lands, as outlined in **Table 1**. Operations which are located within the proposed settlement area boundary expansion (i.e. those located on the subject lands) have not been included in the MDS calculations as the MDS setbacks of these operations will no longer apply if the lands are brought into the settlement area (see MDS Guideline #36).

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; the type of manure system and the type of land use. These factors were determined through field observations undertaken during roadside visits, aerial imagery review, and property searches in business directories and local news sources.

OMAFA's AgMaps mapping application was used to calculate property size and barn size, where required, and the AgriSuite program was used to prepare the calculations. The MDS calculations prepared by Colville Consulting Inc. (April 2024) for the Centre Wellington SABE AIA were consulted where the MDS worksheets indicated that livestock/manure information was confirmed with the property owner and/or farm operator. See **Table 1** for a summary of MDS, and **Appendix B** for the MDS worksheets generated in AgriSuite.

Table 1. MDS I Summary Table

Address	Livestock Operation Type	MDS	MDS met
6684 Beatty Line (Drost Cattle Inc.)	Livestock Operation – beef cattle	818 m	Υ
6707 Irvine St (Milky Hills Farm/Dutcholm)	Livestock Operation – dairy cows	Barn - 487 m Manure Storage – 539 m	Y
6718 Gerrie Rd	Livestock Operation – beef cattle	246 m	Υ
456 Wellington Rd 7	Hobby Farm – equine	250 m	Υ
*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)

The MDS I setback calculations completed for the livestock operations indicate that the proposed settlement area boundary expansion meets the setback requirements, and as such, complies with the minimum distance separation formulae.

4.3 Agricultural Priority

Township of Centre Wellington Agricultural Impact Assessment

Colville Consulting Inc. was retained by the County of Wellington in April 2024 to prepare an Agricultural Impact Assessment ('Colville AIA') for the Centre Wellington Settlement Area Boundary Expansion to identify the potential impacts of the Potential Expansion Areas (PEAs) on the agricultural system. The study was completed in two phases. The first focused on a Minimum Distance Separation (MDS) Study to identify potential compatibility constraints and to refine the study area for potential settlement area boundary expansion areas. Through the first phase, eight PEAs were identified. The second phase comparatively evaluated the eight PEAs to identify preferred settlement area boundary locations.

While this AIA considered the MDS portion of the Colville AIA in its MDS review, of most interest is the comparison of the eight PEAs in terms of agricultural priority and preferred settlement area boundary locations. The Colville AIA acknowledges that all eight of the PEAs are part of a prime agricultural area and designated in the County of Wellington Official Plan as 'Prime Agricultural', and, as such evaluated reasonable alternatives based on agricultural priority.

PEA E, as identified in the Colville AIA, consists of the eastern half of the subject lands. Area E was intended to help satisfy the Elora Community land needs. In the comparative analysis, the Colville AIA identified PEA E as having the third lowest agricultural priority of the eight PEAs. This was based on a comparison of vegetative cover, land improvements, MDS I constraints, potential for MDS II constraints, CLI %, and agricultural infrastructure. **Table 2** below is the PEA E excerpt of the Colville AIA table with the comparative PEA analysis. The first row is the analysis from the Colville AIA (eastern half of subject lands only). The second row shows the changes to content when considering the entire subject lands instead of just the eastern half (as included in the Colville AIA).

Table 2. Colville AIA's Analysis of PEA E					
Vegetative Cover	Land Improvements	MDS I Constraints	Potential for MDS II Constraints	CLI %	Agricultural Infrastructure
Primarily cultivated	1 constructed drain	None	None	CLI Class 1 (81.3%) CLI Class 2 (3.5 %) CLI Class 3 (15.1%)	None
Changes to	the above that reflec	t consideration	n of the entire	subject lands	
N/A	Constructed drain will not be removed but incorporated into the development Removal of 4.63 hectares of systematic tile drainage & 8.11 hectares of random	N/A	N/A	CLI Class 1 (73.5%) CLI Class 2 (10.7%) CLI Class 3 (15.8%)	Northern parcel: barn and implement shed Southern parcel: three barns, implement sheds, grain

Overall, based on the criteria included in the Colville AIA, changes that impact the agricultural priority of the lands include the presence of tile drainage and existing agricultural structures (increase agricultural priority of the lands). While several barns and structures are proposed to be removed, based on our discussions with the landowners, these facilities do not currently house livestock. Based on roadside investigations and a review of aerial imagery, there is no evidence that livestock have been housed in the barn on the northern parcel in recent history. Additionally, it is our understanding that the livestock facilities on the southern parcel have been decommissioned; nonetheless the future viability of this livestock facility is already constrained by the proposed Ainley Subdivision (6542 & 6560 Gerrie Road, Elora). The agricultural buildings are still capable of housing agricultural equipment and products (ex. hay). Overall, it is our opinion that the subject lands continue to represent lower priority agricultural lands among the PEAs as expanded on in the following section.

Assessment of Agricultural Priority

Policy 2.3.2.1d provides that in allowing a settlement area boundary expansion in prime agricultural areas, planning authorities shall consider:

The evaluation of alternative locations which avoid prime agricultural areas, and where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas.

The PPS 2024 requires that when contemplating a settlement area boundary expansion, planning authorities may allow certain criteria to be considered. This differs from the PPS 2020 which required that these criteria be demonstrated. See below for the policy comparison between the PPS 2020 and the PPS 2024.

PPS 2020

- 1.1.3.8c)2. A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review and only where it has been <u>demonstrated</u> that in prime agricultural areas alternative locations have been evaluated, and
- 1. there are no reasonable alternatives which avoid prime agricultural areas; and
- 2. there are no reasonable alternatives on lower priority agricultural lands in prime agricultural areas;

PPS 2024

2.3.2.1d) In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;

Provided the above, PPS 2024 Policy 4.3.4 allows for the removal of land in prime agricultural areas for expanding settlement areas, subject to consideration of all of the conditions outlined in PPS 2024 Policy 2.3.2.

OMAFRA's 'Evaluating Alternative Locations for Non-Agricultural Uses' guidance in Publication 851 (herein referred to as Publication 851) was referenced in the preparation of this report. Publication 851 outlines the following hierarchy to direct non-agricultural uses in agricultural areas based on PPS 2020 Policy 2.3.1 (now PPS 2024 Policy 4.3.1.3):

- 1) Avoid Specialty Crop Areas
- 2) If possible, avoid other prime agricultural areas
- 3) If 2) is not achievable, evaluate Lower Priority Agricultural lands

Specialty Crop Areas & Other Prime Agricultural Areas

The Province's Agricultural Systems mapping does not indicate the presence of any Specialty Crop Areas within 1.5 kilometres of the site or within proximity to the Elora settlement area boundary.

Publication 851 encourages contiguous settlement area expansion (expansion on lands adjacent to the existing settlement area. All developable lands (lands not containing natural heritage features) within proximity to the Elora settlement area are identified within a prime agricultural area and contain Canada Land Inventory (CLI) Class 1-3 soils. As such, it is not possible to provide for a logical extension of the settlement area that avoids prime agricultural areas.

Assessment of Agricultural Priority

Since prime agricultural lands cannot be avoided, the PPS directs development to lower priority agricultural lands. OMAFRA's guidance on 'Evaluating Alternative Locations for Non-Agricultural Uses', as derived from their 'Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas', provides that the following areas may be considered lower priority agricultural lands within prime agricultural areas:

- Areas along transportation corridors where disturbances to agriculture would be minor.
- Areas adjacent to other non-agricultural uses (e.g., settlement areas or other existing non-agricultural uses) to cluster non-agricultural uses and avoid scattered non-agricultural development.
- Areas zoned for non-agricultural uses.
- Land not used, or underutilized, for agriculture, such as:
 - Lower quality land based on Canada Land Inventory ratings (e.g. non-prime agricultural land classes 4 to 7, or, where all land is prime agricultural land, relatively lower quality land in the area)
 - o Disturbed land (e.g., former abandoned aggregate sites or brownfield sites)
 - Highly fragmented areas (e.g. small parcels, non-agricultural uses present)
 - o Relatively small area in active agricultural use

Additionally, OMAFRA's guidance recommends that the following areas be avoided for non-agricultural development:

- large blocks of designated prime agricultural area or prime agricultural land
- areas where major investments have been made into agriculture, such as:
 - elements of the agri-food network including infrastructure, services and assets important to the viability of the agri-food sector (e.g., grain handling facilities, food processors, greenhouses, distribution centres, areas with drainage tile [priority for protection is systematic, random, no tiles])
 - concentrations of livestock facilities
 - o areas with perennial crops having long establishment times

An evaluation of the agricultural priority of the subject lands based on the OMAFA criteria identified above is provided in **Table 3** below.

The subject lands are mapped as containing predominantly CLI Class 183T² with a small portion of CLI Class 182T² in the northwest portion of the site and a portion of CLI Class 2W soils along the municipal drain. Class 1 soils have no significant limitations in use for crops, Class 2 soils have moderate limitations that restrict the range of crops or require moderate conservation practices, and Class 3 soils have moderately severe limitations that restrict the range of crops or require special conservation practices. The primary type of limitation for growing common field crops is topography (T), which means the

percent of slope and the pattern or frequency of slopes in different directions affect the cost of farming and the uniformity of growth and maturity of crops as well as the hazard of erosion, and excess water (W) which indicates where excess water other than brought about by inundation is a limitation to agricultural use. In this case, excess water is a limitation on lands adjacent to the municipal drain. Tile drainage has been implemented in the northwestern corner of the lot, likely to reduce any excess water from the municipal drain. Overall, the CLI class of the lands indicate that there are minimal limitations for common field crops.

With respect to fragmentation, the lands are surrounded by agricultural uses to the north, northeast, and northwest. The subject lands are also located adjacent to the existing Elora/Salem settlement area; the settlement area impedes the contiguity of the agricultural area in proximity to the subject lands. Outside of the settlement area there are larger lots that are more suitably sized for a range of agricultural uses, mixed with a few smaller rural residential properties and smaller hobby farms. This pattern is consistent throughout much of the lands adjacent to the existing settlement area boundary. Given the above, the surrounding agricultural area is already fragmented by nature of proximity to existing settlement areas, non-agricultural uses, and rural residential uses. The northern corner of the subject lands is also crossed by a municipal drain that cuts off this portion of the property from the rest of the property, fragmenting the continuity of cropland on the subject lands. Additionally, removal of this lands will not result in the creation of any isolated agricultural parcels.

Overall, the subject lands exhibit characteristics of lower priority agricultural lands given existing fragmentation in the area, proximity to existing non-agricultural uses, location adjacent to an existing settlement area, and limited agricultural improvements on the land.

Table 3. Assessment of Agricultural Priority of Subject Lands based on OMAFRA criteria			
Criteria	Commentary		
Proximal to transportation corridor*	Not located adjacent to a major transportation corridor, but bordered on the northeast, northwest, and southwest by existing local roads.		
Adjacent to other non-agricultural uses**	Yes. Adjacent to an established residential area within the Elora/Salem settlement area boundary to the south, southeast, and southwest.		
Area zoned for non-agricultural use	No. Subject lands are not zoned for a non-agricultural use.		
CLI Class***	Predominantly CLI Class 183T ² with a small portion of CLI Class 182T ² in the northwest portion of the site and a portion of CLI Class 2W soils along the municipal drain.		
Highly fragmented area	Moderately fragmented. The contiguity of the agricultural area in proximity to the lands is already impeded by nature of adjacent settlement area. Additionally, the northern corner of the subject lands is traversed by a municipal drain that fragments that corner from the rest of the property. Outside of the settlement area there are larger lots that are more suitably sized for a range of agricultural uses, mixed with a few smaller rural residential properties and smaller hobby farms. This pattern is consistent throughout much of the lands adjacent to the existing settlement area boundary.		
Relatively small area in active agricultural use	78.08 hectares (193.01 acres) site is in agricultural use.		
Disturbed land	No the subject lands are not disturbed, they are under agricultural production.		
# of active livestock facilities within 1500 m (& on-site)****	Three. MDS calculations determined no infringement of setback on site. No concentration of livestock operations within the area.		
Perennial crops	No presence of perennial crops with long establishment times on the subject lands.		
Contains elements of agri-food network	Limited elements of the agri-food network present on the subject lands. No grain handling facilities, food processors, greenhouses, or distribution centres. Only random and systematic tile drainage in northern corner of site.		

Note: green shading denotes criteria that indicate lower priority agricultural lands per OMAFRA guidance on 'Evaluating Alternative Locations for Non-Agricultural Uses'

*Proximal to major transportation corridor – determined by whether Provincial Highways or County Roads are adjacent to the lands
**Adjacent to other non-agricultural uses – determined by whether any adjacent parcels contain uses not permitted in the agricultural zone.

***CLI Soil Class – Based on Canada Land Inventory Soil Classifications:

- The 7 different capability classes indicate general capability of the soil for growing common field crops (ex. <u>3</u>FM). Those that are relevant in this analysis include:
 - 1 Soils in this class have no significant limitations in use for crops
 - o 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.
- The 13 different capability subclasses indicate the primary type of limitation or hazard for growing common field crops (ex. 3<u>FM</u>). Those that are relevant in this analysis include:
 - T Topography: this subclass is made up of soils where topography is a limitation. Both the percent of slope and the pattern or frequency of slopes in different directions affect the cost of farming and the uniformity of growth and maturity of crops as well as the hazard of erosion.
 - W Excess Water: this subclass includes soils where excess water other than brought about by inundation is a limitation to agricultural use. Excess water may result from inadequate soil drainage, a high-water table, seepage or from runoff from surrounding areas.
- 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. 183T²). The numeric superscripts denote the proportion of the area out of a total of 10. For example, if the capability rating shown is 183T², then 80% of the area is Class 1 and 20% is Class 3T.

****Number of active livestock facilities within 1500m (including on site) – determined based on whether there was indication of livestock present in farm buildings within 1500m of the property boundaries of potential sites, observed through review of aerial imagery and roadside site investigations. Distance based on investigation distance requirements of MDS quidelines for Type B land uses.

5.0 Assessment of **Impacts to Agriculture**

5.1 Reduction/Loss of Agricultural Land and **Infrastructure**

The settlement area boundary expansion and development is proposed on approximately 78.08 hectares (193.01 acres) of land currently in agricultural production (cash crops) with predominantly Class 183T² soil capability and a portion of 2W soil where the municipal drain is located and Class 182T² in the northwest corner; CLI Class 1 soils predominate. The inclusion of the lands within the settlement area boundary and the eventual development of the lands will result in the removal of prime agricultural lands, agricultural structures and existing agricultural drainage improvements (tile drainage). The type and nature of the agricultural uses on the subject lands are typical of Wellington County, as confirmed through a review of Census of Agriculture data and OMAFRA's Ontario business, agri-food, and farm data profile for Wellington County. The subject lands were planted with hay and winter wheat in 2024, which is common for the area.

5.2 Fragmentation of Agricultural Lands

Agriculture uses and activities benefit from being adjacent to other agricultural operations and if lands are fragmented, there is potential to negatively impact farming practices on the isolated farm parcels and the economic viability of the agricultural area. Large farm parcels make use of economies of scale to lower costs of production whereas standalone small farm parcels have limited economic viability. As well, fragmented agricultural areas have a higher potential for conflict with non-farm uses relative to agricultural areas with lower levels of fragmentation which generally have fewer potential sources of non-agricultural use conflicts.



Image 2: Parcel fabric of surrounding area

The proposed settlement area boundary expansion and residential development is surrounded by agricultural uses to the north, northeast, and northwest, and adjacent to the Elora/Salem settlement area boundary to the south; the Fergus settlement area is also located northeast of the subject lands (approximately 1.1 km away). As shown on **Image 2**, the contiguity of the agricultural area is already impeded by nature of the adjacent settlement areas. Outside of the settlement areas there are larger lots that are more suitably sized for a range of agricultural uses, mixed with a few smaller rural residential properties and smaller hobby farms. Provided this, the surrounding agricultural area is already fragmented by nature of proximity to existing settlement areas, non-agricultural uses, and rural residential uses. The level of fragmentation within the surrounding area decreases the agricultural priority of the lands for agriculture. Additionally, removal of this lands will not result in the creation of any isolated agricultural parcels; the lands are separated from adjacent farmland by existing roads which provide for separation from the surrounding agricultural area.

5.3 Compatibility Impacts

The proposed settlement area boundary expansion and residential development does not pose significant compatibility concerns to surrounding normal farm practices. The MDS I review identified no compatibility issues related to odour from nearby livestock operations. Additionally, the lands are adjacent to the current Elora/Salem settlement area boundary to the south and in proximity to the Fergus settlement area to the southeast. As such, the study area already consists of a high degree of non-farm uses which suggests an existing level of interaction between farm and non-farm property owners in the area. With the implementation of mitigation measures outlined in Section 6 below (including edge planning techniques, and awareness and education strategies), compatibility impacts are not anticipated.

5.4 Economic and Community Impacts

The subject lands do not contain supportive agricultural infrastructure or services (ex. farmers market, grain elevator, agri-tourism) that are integral to the surrounding agricultural community. The subject lands also do not produce a commodity that the surrounding agricultural system or agri-tourism industry deeply depends on; rather, hay and winter wheat crops are common within the study areas and the broader County. Additionally, the proposed settlement area boundary expansion and residential community will provide much needed urban land⁴ and housing that will provide community and economic benefits. Phased development is recommended to keep land in agricultural production until it is needed for development, to provide for a progressive transition of the lands. Overall, no negative economic nor community impacts are anticipated due to the proposed expansion of the settlement area onto prime agricultural lands.

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⁴ Additional residential urban land in Centre Wellington was identified as a requirement to accommodate projected growth in the Land Needs Assessment prepared by Watson and Associates Land Economists Ltd. (September 2022) for the County.

5.5 Traffic Impacts

Interactions between non-farm and farm traffic can pose safety concerns. A Traffic Impact Study (TIS) was prepared by Paradigm in support of this application. Most relevant to this AIA, the TIS forecasted that the intersections of Nichol Road 15 and Irvine Street and Nichol Road 15 and Gerrie Road, and the proposed municipal street connections to Irvine Street, Nichol Road 15, and Gerrie Road would continue to operate within acceptable levels of service under 2035 and 2040. The TIS determined that upon completion of the subject site left-turn lanes would be warranted at the following intersections: Westbound on Nichol Road 15 at Irvine; Westbound on Nichol Road 15 at Gerrie Road; Westbound on Nichol Road 15 at proposed Street N-W and Street N-E. As such, dedicated left turn lanes for slowing will allow vehicles to safely make turns without impeding traffic which is a safety benefit to agricultural traffic.

Additionally, as described in Section 6 below, education to reduce any risks to farm traffic is recommended in Section 6 below, such as through training for construction and maintenance personnel and the erection of signage at site entrances proposed on Nichol Sideroad 15 and Gerrie Road is recommended to encourage considerate behaviour towards farm equipment on roadways. It is noted, however, that both Nichol Sideroad 15 is already a highly travelled municipal road servicing as an 'informal' east/west by-pass to the settlements of Fergus and Elora/Salem. As a result, agricultural traffic on this road has already had to adapt to the existing volumes and speeds of traffic along this road.

5.6 Water Resources

In support of the proposal, a Preliminary Geomorphology Report was prepared by GeoMorphix (2025) and a Preliminary Stormwater Management (SWM) Strategy Report was prepared by MTE (2025) to provide a strategy to ensure that surface water resources are protected. The development will be municipally serviced and is not anticipated to impact groundwater resources.

The Geomorphology Report referenced the 2008 Nichol Drain Subwatershed Study by Aquafor Beech Limited which characterized watercourse reaches (homogenous segments of channel) of the Nichol Drain downstream of the subject lands as potentially sensitive in upstream use. As such, detailed erosion mitigation measures are being determined through further studies by GeoMorphix to support appropriate SWM planning for the subject lands to ensure that the Nichol Drain is protected. Otherwise, stormwater management for the development achieves an enhanced level of water quality control and quantity control to pre-development levels through implementation of the SWM recommendation measures.

6.0 Mitigation Measures

The PPS 2024 (Policy 2.3.2.1) requires that when considering a settlement area boundary expansion in prime agricultural areas, planning authorities consider "impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance". This section of the AIA provides an evaluation of impacts and any associated mitigation measures.

6.1 Minimizing Impacts

The following table incorporates Table 3 (Minimize and Mitigate Impacts) found in section 3.2.2 of the Province's Draft Agricultural Impact Assessment Guidelines. The purpose of this table is to provide a summary of how the proposed project minimizes or mitigates impacts on surrounding agricultural uses.

Table 4: Summary of Net Impacts

Objective	Mitigation Measure	Description
Minimize the loss of agricultural land		The lands are primarily comprised of Class 1 soils.
		The location of the subject lands adjacent to the existing Elora/Salem settlement boundary and between this settlement boundary and the Fergus settlement boundary suggests that there is already fragmentation and reduced contiguity of the prime agricultural area in proximity to the subject lands. As such, the proposed location of the settlement area boundary expansion minimizes impacts on the agrifood network.
Minimize the fragmentation of agricultural land	Maintain farm parcels	The proposed settlement boundary expansion is adjacent to the existing settlement area, follows existing farm property lines/road patterns, and does not create isolated farm parcels. Surrounding lands are already highly fragmented by other non-agricultural uses (ex. lands within the Elora/Salem and

		Fergus settlement areas and rural residential properties).
Minimize impacts on farmland and agricultural operations	Edge Planning	It is recommended that edge planning along the interface of the proposed development and agricultural lands in the surrounding area be implemented as much as possible.
		Design elements such as road design, vegetative and fencing buffers, setback provisions and increased lot depths can allow for the necessary separation of uses from surrounding agricultural uses.
	Minimum Distance Separation	The settlement area boundary expansion complies with MDS setbacks.
	Select compatible land uses; put lower impact development adjacent to farmland and operations	Generally, those portions of the site directly adjacent to agricultural lands are proposed at a lower density to those areas adjacent to the existing settlement area boundary and/or interior to the site. This serves to locate lower impact residential development adjacent to farmland.
	Design to support agriculture (e.g. help farms to continue to	The development should be phased to maximize lands in agricultural production as development progresses.
	operate; help prevent and reduce trespassing and vandalism)	Conflicts between the proposed settlement area boundary expansion and the surrounding agricultural land uses should be minimized through the implementation of physical and visual barriers (vegetation and fencing) at the interface of the farm and non-farm parcel.
		Access points from the development to roadways should also be planned away from farm entrances on surrounding farm properties to minimize potential for conflicts and congestion.
Minimize and mitigate changes in water quality or quantity	Implement a groundwater monitoring program	The proposed development is planned to be on full municipal services and as such no groundwater taking is proposed. Therefore, no impacts on surrounding wells are anticipated.

	Control post-development run-off and enhance water quality control	A preliminary stormwater management shall be prepared to ensure necessary water controls will be in place.
Mitigating impacts during construction or operations (e.g. noise)	Adjust operational procedures to accommodate agriculture in the area	Consideration can be given to modifying construction operating hours and methods to reduce impacts on agricultural operations in proximity to the expansion areas. During construction of the development, agricultural education should be provided to all construction personnel to encourage respectful behaviour towards the agricultural community and treatment of agricultural land.
		Consideration should also be given to the use of equipment on methods to suppress dust created during construction.
	Vegetative berms	Create a vegetative berm for dust control during construction to reduce impacts on surrounding livestock or crops.
	Maintain, restore or construct farm infrastructure	The existing municipal drain running through the northern corner of the subject lands will be maintained.
Mitigate ongoing impacts from new development	Implement measures that can be in place post development to support compatibility with agriculture	It is recommended that the use of best salt management practices for roads, sidewalks and other paved surfaces in the subdivision be used to avoid adverse impacts on neighbouring farms and natural heritage areas. In addition, the use of non-invasive plant species for landscaping should be used as much as possible.
		A disclosure statement should be provided to notify a potential purchaser of a property that interface with agricultural lands that they are buying land that is in proximity to a farm operation and may experience periods of dust, noise and odour and other impacts associated with nearby farms during certain times of the year.
		Signage should be incorporated to inform residents they are in proximity to agricultural operations and highlight

		possible associated activities. Signage to be alert for slow moving farm equipment should be posted near the development's accesses to Nichol Rd and Gerrie Rd.
Education to achieve greater compatibility between agricultural and non-agricultural uses	Education and awareness	Warning clauses should be included into conditions of approval and Purchase and sale agreements that advise future homeowners of the surrounding agricultural operations and potential noise and odour that could result from these operations. In order to avoid trespassing, vandalism, and other concerns, consideration should be given to distributing education and awareness brochures about normal farm practices and the potential financial, resource and biosecurity impacts that could result from trespassing and vandalism. During construction of the facility, agricultural education should be provided to all construction personnel to encourage respectful behaviour towards the agricultural community and treatment of agricultural land.

In reviewing the Elora Sands Development Concept (Figure 2) relative to relevant mitigation measures described above, the following provides some commentary on the design and feasible mitigation factors. These recommendations are based on the British Columbia Ministry of Agriculture's 2015 Guide to Edge Planning ('Guide to Edge Planning'); Ontario does not yet offer comprehensive guidance on edge planning.

Beneficially, the subject lands are separated from adjacent agricultural lands by public roadways (Gerrie Road and Nichol Sideroad 15). This means that future residential lots will not directly abut farmland. Additionally, parkland is proposed interior to the site, ideally locating an area anticipated for outdoor public use away from active agricultural areas. This layout of the concept minimizing ease of trespassing or littering (relative to when yards or public areas abut agricultural fields). Further, portions of the site directly adjacent to agricultural lands are proposed at a lower density to those areas adjacent to the existing settlement area boundary and/or interior to the site. This serves to locate lower impact residential development adjacent to farmland. Overall, the conceptual layout appears to be generally well laid out to minimize impacts on surrounding agricultural uses.

The use of edge planning techniques should be incorporated into the detailed design of the development to ensure that surrounding farm operations are protected and that the future expansion and potential shifts in agricultural production can proceed. We encourage the maintenance of a 30-metre separation

distance between farmland and a housing unit; the existing separation afforded by the road allowance that separates the subject lands from adjacent farmland is beneficial in this respect. Incorporation of longer and deeper lots where low-density residential uses are adjacent to farmland can also help achieve this separation. Additionally, buffers should be incorporated to prevent trespassing and the associated problems of litter and crop damage and mitigate the effects of noise, light, and dust and spray drift. We recommend incorporating fencing and edge plantings along property lines where dwellings abut roadways adjacent to farmland to provide for visual separation. The Guide to Edge Planning recommends a vegetative buffer width of 15-metres for residential uses, with a recommended crown density of 50-75% of mixed deciduous and coniferous species to optimize year-round screening. Edge plantings should employ low-maintenance, drought-tolerant plants and avoid invasive plant species, and should exceed 6-metres in height at plant maturity. This buffer area could provide opportunity for a trail network at the perimeter of the site.

Enhancing agricultural awareness can help enhance compatibility between farm and non-farm uses. Warning clauses should be incorporated into future approval conditions and purchase and sale agreements to ensure that those who choose to live and work on the subject lands are aware of the agricultural operations in the surrounding area, normal farm practices, and the importance of protecting the agricultural lands/operations. In consultation with the municipality, consideration should also be given to erecting signage along the urban-agriculture boundary that informs residents of the adjacent active farming area and of possible activities associated with farm operations. 'Share the Road' signage should also be considered at proposed accesses onto Nichol Sideroad 15 and Gerrie Road to caution residents of potential slow moving farm equipment.

Finally, to protect surrounding agricultural operations, 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.

7.0 Recommendations

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

- 1. All the recommendations of the technical reports should be implemented to minimize and prevent impacts to adjacent and surrounding agricultural uses and operations.
- 2. During construction of the facility, 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. Signage to this effect should be erected at site entrances as soon as possible and maintained for the life of the facility. Share the road signage should be placed following finalization of construction.
- 3. A Traffic Impact Study should be prepared in support of this application with consideration of impacts to agricultural traffic, specifically during April through to November when farm equipment is more active on roadways, and mitigation measures to be implemented on the site.
- 4. The use of edge planning techniques should be incorporated to ensure that surrounding farm operations are protected and that the future expansion and potential shifts in production associated with the operations are permitted to proceed. Adequate separation and buffering should be incorporated into the site design where proposed uses abut the urban-agriculture boundary.
- 5. Warning clauses should be incorporated into future approval conditions and purchase and sale agreements to ensure that those who choose to live and work on the subject lands are aware of the operations in the surrounding area and of the importance of protecting the agricultural lands/operations.
- 6. In consultation with the Township, consideration should be given to erecting signage along the urban-agriculture boundary that informs residents of the adjacent active farming area and of possible activities associated with farm operations and normal farm practices. 'Share the Road' signage should also be considered at proposed accesses onto Nichol Sideroad 15 and Gerrie Road to caution residents of potential slow moving farm equipment.
- 7. 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.

8.0 Summary

The proposed Elora Sands Development and settlement area boundary expansion is not anticipated to have a negative impact on the long-term viability of agriculture within the Township and County. This opinion recognizes the following:

- The settlement area boundary expansion and development is proposed on approximately 78.08 hectares (193.01 acres) of land currently in agricultural production (cash crops) with predominantly Class 183T² soil capability and a portion of 2W soil where the municipal drain is located and Class 182T2 in the northwest corner; CLI Class 1 soils predominate
- The surrounding agricultural area is already fragmented by nature of proximity to existing settlement areas, non-agricultural uses, and rural residential uses. The level of fragmentation within the surrounding area decreases the agricultural priority of the lands for agriculture. Removal of this lands will not result in the creation of any isolated agricultural parcels.
- The subject lands are not within a specialty crop area.
- The proposed expanded settlement area 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 non-agricultural uses, location adjacent to an existing settlement area, 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.

Respectfully submitted,

MHBC

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Partner

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Appendix A: Secondary Study Area Review

	SECONDARY STUDY AREA – LIVESTOCK FACILITY/MANURE STORAGE SUMMARY TABLE				
Site	Address	Facility Type	MDS Required	Notes	
	6684 Beatty Line (Drost Cattle Inc.)	Livestock facility – beef cattle	Yes	This property is well setback from public roadway and as such we also reviewed aerial imagery of the property and researched the business address online. The livestock operation appears to have housed beef cattle. The aerial imagery reveals three barns that appear capable of housing livestock and several smaller buildings/structures that are presumed to be used for storage and a farm office. Additionally, the farm cluster appears to contain several different forms of manure storage including V2 Storage Type (outside, covered, solid) and V3 Storage Type (outside, no cover, solid). There are three dwellings located on separate parcels that are closer to the livestock operation than the subject lands. This property was bought by a developer in 2023 and was brought into the Fergus settlement area boundary prior to reversal by the Province in October 2023. While a MDS calculation is still necessary, this suggests intention to develop the lands in the future. As such, investment to expand the operation would appear unlikely.	
	6683 Gerrie Rd (Drost)	Agriculture-related Use	No	This property contains a dwelling and a large building with several bay doors. Based on our roadside observations and a review of aerial imagery, the large building located beside the	

			dwelling does not appear to be for livestock but rather for an agriculture-related or on-farm diversified use.
6611 Gerrie Rd	Farm – grain and equipment storage	No	The lands contain a dwelling, drive sheds, silos (including one capped and one uncapped old silos) and grain bins. There are eight Quonset huts located to the rear of the main farm cluster which, based on roadside observations, appear to be used for equipment storage. There was no evidence of livestock observed. An OFA member sign was observed at the driveway entrance.
6681 Irvine St (Portage Ontario)	Institutional – Drug Rehabilitation Program for Youth	N/A	N/A
6707 Irvine St (Milky Hills Farm/Dutcholm)	Livestock Operation – Dairy Cattle	Yes	The property contains a dwelling, a livestock barn, a drive shed, several capped silos, and manure storage (outdoor, uncovered, liquid). No livestock was observed during the roadside survey, but the barn appeared to be capable of housing livestock.
			Based on an internet search, the livestock on this farm were sold off in September 2024 through a complete farm dispersal sale. The sale advertisement included 104 cattle (67 Holstein, 21 Jersey, & 4 Brown Swiss). The farm sign included a Dairy Farmers of Ontario symbol. An OFA member sign was observed at the driveway entrance.
6718 Gerrie Rd	Hobby Farm – beef cattle	Yes	This property contains a dwelling, grain bins, an old barn, several small pasture areas, and several outdoor run-ins.
456 Wellington Rd 7	Hobby Farm – equine	Yes	This property contains a barn, pastureland, and cultivated land. Several horses and ponies were witnessed on the lands.

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: MDS Worksheets & Setback Figure





MDS I - Elora Sands Developmen

General information

Application date Dec 3, 2024

Applicant contact information

Elora Sands Developments Inc. ON

Municipal file number

Location of subject lands County of Wellington Township of Centre Wellington NICHOL Concession 12, Lot 16-17 Roll number: 2326000021002000000 Proposed application
New or expanding settlement area boundary

6684 Beatty Line -Drost Cattle

Farm contact information



Location of existing livestock facility or anaerobic digestor

County of Wellington

Township of Centre Wellington

NICHOL

Concession 13; 14, Lot Part 12, 13, 14; Part 15,

Roll number: 2326000023050000000

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Beef, Feeders (7 - 16 months), Confinement Bedded Pack	2500	833.3 NU	11613 m²



Confirm Livestock/Manure Information (6684 Beatty Line -Drost Cattle)

The livestock/manure information has not been confirmed with the property owner and/or farm operator.

Setback summary

Existing manure storage V2. Solid, outside, covered

Design capacity 833.3 NU Potential design capacity 833.3 NU

Factor A (odour potential) 0.8 Factor D (manure type) 0.7

Factor B (design capacity) 663.17 Factor E (encroaching land use) 2.2

Total lot size 155 ha

Building base distance 'F' (A \times B \times D \times E) (minimum distance from livestock barn)

Actual distance from livestock barn

Storage base distance 'S'

(minimum distance from manure storage)

Actual distance from manure storage

818 m (2684 ft)

818 m (2684 ft)

NA

NA

Farm contact information



Location of existing livestock facility or anaerobic digestor County of Wellington Township of Centre Wellington

NICHOL

Concession 12, Lot 12-13

Roll number: 2326000023084000000

Total lot size 89 ha

487 m (1598 ft)

539 m (1768 ft)

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Liquid	Dairy, Milking-age Cows (dry or milking) Large Frame (545 - 658 kg) (eg. Holsteins), 3 Row Free Stall	133	190 NU	1297 m²



Confirm Livestock/Manure Information (6707 Irvine St)

The livestock/manure information has not been confirmed with the property owner and/or farm operator.

Setback summary

Existing manure storage M1. Liquid, outside, no cover, straight-walled storage

Design capacity 190 NU
Potential design capacity 190 NU

Factor A (odour potential) 0.7 Factor B (design capacity) 395.28 Factor D (manure type) 0.8 Factor E (encroaching land use) 2.2

Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)

Actual distance from livestock barn NA

Storage base distance 'S' (minimum distance from manure storage)

Actual distance from manure storage

Farm contact information (!)



Location of existing livestock facility or anaerobic digestor County of Wellington

Township of Centre Wellington **NICHOL**

Concession 12, Lot 13

Roll number: 2326000023085000000

Total lot size 28.3 ha

246 m (807 ft)

246 m (807 ft)

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	34	34 NU	158 m²



Confirm Livestock/Manure Information (6718 Gerrie Rd)

The livestock/manure information has not been confirmed with the property owner and/or farm operator.

Setback summary

Existing manure storage V3. Solid, outside, no cover, >= 30% DM

Design capacity 34 NU Potential design capacity 34 NU

Factor A (odour potential) 0.7 Factor B (design capacity) Factor D (manure type) 0.7 Factor E (encroaching land use) 2.2

Building base distance 'F' (A x B x D x E) (minimum distance from livestock barn)

Actual distance from livestock barn NA

Storage base distance 'S' (minimum distance from manure storage)

Actual distance from manure storage NA

Farm contact information (!)

Location of existing livestock facility or anaerobic digestor County of Wellington Township of Centre Wellington

PILKINGTON

Concession BLOCK A, Lot 1

Roll number: 2326000017131000000

Total lot size 18.3 ha

Livestock/manure summary

Manure Form	Type of livestock/manure	Existing maximum number	Existing maximum number (NU)	Estimated livestock barn area
Solid	Horses, Large-framed, mature; > 680 kg (including unweaned offspring)	25	35.7 NU	755 m²

Setback summary

V3. Solid, outside, no cover, >= 30% DM Existing manure storage

35.7 NU Design capacity Potential design capacity 35.7 NU

Factor A (odour potential) 0.7 Factor B (design capacity) 231.42 Factor D (manure type) Factor E (encroaching land use) 2.2

Building base distance 'F' (A x B x D x E) 250 m (820 ft)

(minimum distance from livestock barn)

Actual distance from livestock barn NA

250 m (820 ft) Storage base distance 'S'

(minimum distance from manure storage)

Actual distance from manure storage NA

Preparer signoff & disclaimer

Preparer contact information Chelsea Brooks MHBC Planning

540 Bingemans Centre Drive 200 Kitchener, ON N2B 3X9 519-576-3650

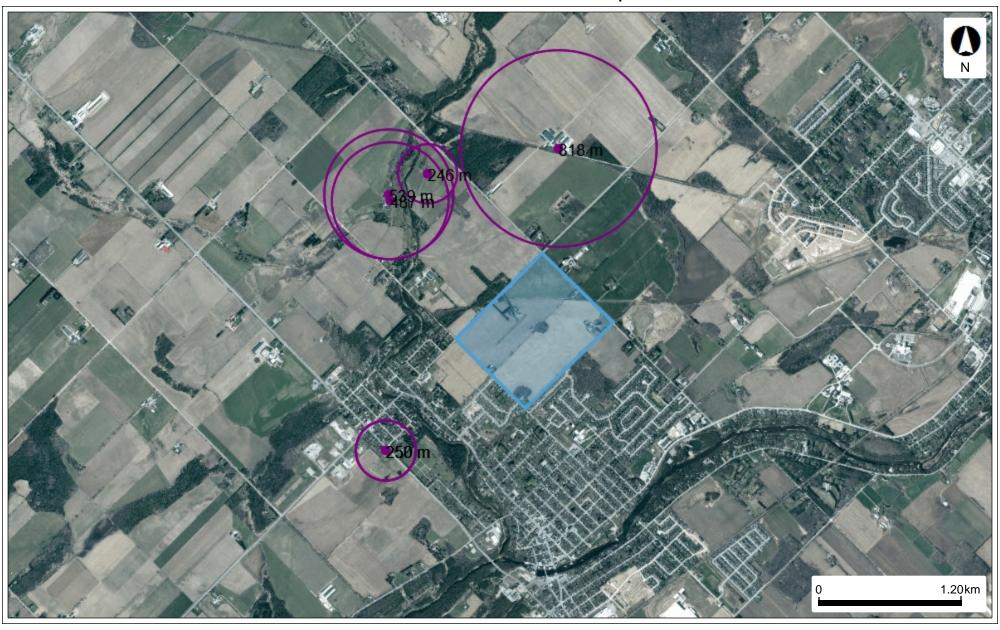
cbrooks@mhbcplan.com

Signature of preparer	
Chelsea Brooks , Planner	Date (mmm-dd-yyyy)
Note to the user	

The Ontario Ministry of Agriculture, Food and Rural Affairs (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.

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MDS I - Elora Sands Development



Prepared By:

Notes:



Map Created: 12/4/2024

Map Center: 43.69967 N, -80.43506 W

