



May 23, 2025

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Urban Area Expansion Application – Peer Review for White Church Agricultural Impact Assessment

At the request of the City of Hamilton (the “City”), Dillon Consulting Limited (Dillon) has undertaken a peer review of the Agricultural Impact Assessment Report prepared by DBH Soil Services Inc. for the Whitechurch Landowners Group Inc., dated February 10, 2025. Dillon’s review is based on the Draft Agricultural Impact Assessment (AIA) Guidance Document prepared by OMAFRA (2018) as well as the relevant agricultural considerations set out under Part B of the Draft Urban Boundary Expansion (UBE) Framework (2024), as well as applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan. Our review included a site visit completed on May 16, 2025, to review/consider Minimum Distance Setbacks (MDS) livestock assumptions based on windshield survey methodology.

Agricultural Impact Assessment Review General Findings

- The lands that are the focus for the AIA (subject lands) are identified as *prime agricultural area* within the City of Hamilton and have been found to be lower priority agricultural lands based on several reasons outlined under Section 6 of the AIA. In addition, the majority of the lands are identified as “Agriculture” in the Rural Hamilton Official Plan (RHOP), although a small portion of the lands are designated as “Rural” and “Open Space” uses. We are in agreement with the reasons presented to classify the subject lands as lower priority agricultural lands relative to other *prime agricultural lands* elsewhere in the City.
- Further to the reasons presented as lower priority agricultural lands, a high-level evaluation of alternative locations was completed as a requirement of an AIA. Review of the alternative’s evaluation was completed and we are in agreement with the methods and findings of the evaluation that removal of these lands from the City’s *prime agricultural area* for urban uses are consistent with PPS 2024. Should there be a need for an expansion, the Subject Lands would be a reasonable choice of location from purely an agricultural perspective, as *prime agricultural areas* cannot be avoided in most locations in the City’s whitebelt area. The subject lands are lower priority agricultural lands, and there are very minor development

City of Hamilton
Page 2
May 23, 2025



constraints related to MDS I setback requirements, as confirmed by our own calculations.

- In general, we agree with the conclusions of the AIA based on our review of the report, methods, cross-referencing of the references provided and on-site review. The AIA was completed in accordance with the Draft AIA Guidance Document prepared by OMAFRA and met the relevant agricultural considerations set out under Part B of the Draft Urban Boundary Expansion (UBE) Framework (2024), as well as applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan.
- No major discrepancies with regarding the sites documented or noted in the AIA other than minor word processing errors. Some minor discrepancies were noted in the following MDS calculations.

MDS Livestock Facility Setback

This peer review assesses the Minimum Distance Separation (MDS) results for livestock facilities as presented in the Agricultural Impact Assessment prepared by DBH Soil Services Inc. (February 2025) for the Whitechurch Landowners Group Inc. The review focuses on evaluating the accuracy and completeness of the MDS I analysis, with particular attention to data inputs, methodological assumptions, and compliance with the MDS Implementation Guidelines.

To assess the validity of the MDS I results, the peer review was conducted in two main components:

1. Technical Review of MDS Calculations and Mapping

A detailed desktop analysis was completed to evaluate:

- Whether the correct MDS Implementation Guidelines were applied;
- Accuracy and consistency of inputs used in the AgriSuite software;
- Representation of MDS setbacks in summary tables and mapping;
- Aerial imagery interpretation to identify any new, modified, or remnant livestock operations.

2. Field Verification through Windshield Survey and Drone Photography

A site reconnaissance was conducted, supplemented by drone imagery, to confirm livestock operations and land use conditions, and to address line-of-sight limitations. This fieldwork aimed to:

City of Hamilton
Page 3
May 23, 2025



- Validate the presence and status (operational, unoccupied, or remnant) of livestock facilities identified in the DBH Soil Services report and through the desktop review;
- Identify any new or modified livestock-related structures or activities within the Study Area not captured in the original assessment;
- Provide photographic documentation of current site conditions to support cross-verification with the MDS calculations.

Summary of Findings

Appendix A: White Church - Agricultural Building List

Provides a comprehensive, field-verified summary of observed conditions, validation of livestock operations, and updates to land use and livestock information.

Appendix B: White Church - MDS Setback Technical Review

Details a technical review of MDS I calculations, including:

- Evaluation of barn measurements and AgriSuite inputs;
- Assessment of livestock type and capacity assumptions;
- Identification of inconsistencies or omissions;
- Recommended revisions to MDS inputs and outputs.

Key Findings & Recommendations

Site #39 (Beef Operation) – Identified with Inaccuracies

- Liquid manure storage should be included in MDS calculations

Site #42 (Horses Operation) – Identified with Inaccuracies

- The estimated livestock barn area should be 485 m², as opposed to the 362 m² entered into the AgriSuite MDS calculations.

Site #79 (Horses Operation) – Identified with Inaccuracies

- The operation should be categorized as unoccupied livestock facility

Site #98 (Sheep Operation) – Identified with Inaccuracies

- Site should be reclassified as a horse operation
- The estimated livestock barn area should be 393 m², as opposed to the 121 m² entered into the AgriSuite MDS calculations.

Site #127 and 128 (Sheep and Horse Operation) – Identified with Inaccuracies

- The estimated horse barn area (building #127) should be 624 m², as opposed to the 815 m² entered into the AgriSuite MDS calculations.
- The estimated sheep barn area (building #128) should be 1,654 m², as opposed to the 744 m² entered into the AgriSuite MDS calculations.

City of Hamilton
Page 4
May 23, 2025



Conclusion

The recommended adjustments, such as updated barn sizes, livestock type corrections, and the inclusion of liquid manure storage, result in moderate increases to MDS setbacks for several sites. However, given the significant separation distances from these operations (ranging from 698 m to 1,488 m), none of the revised setbacks encroach into the Subject Lands.

The full recalculated MDS outputs are available in Appendix B.
For further details, the following materials are available upon request:

- Additional mapping
- AgriSuite MDS reports
- Drone imagery and photography

Closing and Next Steps

Upon review of the Agricultural Impact Assessment Report prepared by DBH Soil Services Inc. for the Whitchurch Landowners Group Inc., dated February 2025, we found that the report appropriately followed the Draft Agricultural Impact Assessment (AIA) Guidance Document prepared by OMAFRA (2018) as well as the relevant agricultural considerations set out under Part B of the Draft Urban Boundary Expansion (UBE) Framework (2024), as well as applicable policies of the Provincial Planning Statement and Rural Hamilton Official Plan. The conclusions of the AIA are what Dillon would expect and we only found minor discrepancies with some of the site findings, none of which would impact the final results of the AIA. Our review of the accuracy and completeness of the MDS I analysis also found minor discrepancies with six sites, in which our analysis review indicated a larger setback would be required though none of the revised setbacks encroach into the Subject Lands. As noted, to complement this

City of Hamilton
Page 5
May 23, 2025



peer review we can provide additional mapping, AgriSuite MDS reports and Drone imagery and photography.

Sincerely,

DILLON CONSULTING LIMITED

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JWH:

Our file: 25-1282