
Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

December 17, 2025

Denise B. Holmes, AMCT
CAO/Clerk, Township of Melancthon
157101 Highway 10
Melancthon, ON
L9V 2E6

RE: Peer Review of Agricultural Impact Assessment – Strada Aggregates Inc. Melancthon Pit and Quarry – Part of Lots 11-14, Concession 3, Township of Melancthon.

Dear Ms. Holmes:

Stovel and Associates Inc. (SAI) was retained by the Township of Melancthon to complete a peer review of the Agricultural Impact Assessment (“AIA”) for Proposed Strada Pit and Quarry Application. The following pages summarize the results of this peer review.

Documentation Reviewed by SAI

The following documents/correspondence was reviewed as part of the submission:

- Site Plans for the Strada Pit & Quarry, dated July, 2025 (MHBC Planning Urban Design and Landscape Architecture).
- Agricultural Impact Assessment, dated January 2025 (MHBC Planning Urban Design and Landscape Architecture).

In addition, SAI completed a reconnaissance survey of the agricultural land uses associated with the subject lands and near surrounding area.

Relevant Planning Documents and Associated Guidelines

The following documents provide the relevant planning context for the Agricultural Impact Assessment:

- *Guidelines on Permitted Uses in Ontario Prime Agricultural Areas: Publication 851*. Ministry of Agriculture, Food and Rural Affairs, 2016.
- *Draft Agricultural Impact Assessment (AIA) Guidance Document*. Ministry of Agriculture, Food and Rural Affairs, 2018.
- Provincial Planning Statement, 2024.
- County of Dufferin Official Plan, Consolidated 2017.

- Township of Melancthon Official Plan, 2014.
- Aggregate Resources Act.

General Comments

The proposed aggregate application is located in a portion of southern Ontario that is well-known for agricultural production, including (but not limited to) potato farming. The combination of suitable growing conditions, soils, capital investment related to agriculture, and farmer expertise provide economic conditions that allow for viable potato farms in the area. The AIA identifies several fields in the Secondary Study Area (“SSA”) that were planted with potato crops and three agricultural operations associated with potato production.

Additional analysis is needed in the AIA to ensure that agricultural production, including potato farming, are not negatively impacted by the proposed mineral aggregate operation.

Review of Planning Framework

The Provincial Planning Statement (PPS), 2024 is a streamlined province-wide land use planning policy framework that replaced both the [Provincial Policy Statement, 2020](#) and [A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019](#). It came into effect October 20, 2024.

The AIA provides an overview of the relevant policies in the PPS, 2024 that relate to agricultural provisions associated with establishing a new mineral aggregate operation.

The AIA correctly notes the definition of Specialty Crop Area. It is defined as:

Specialty crop area: means areas within the agricultural land base designated based on provincial guidance. In these areas, specialty crops are predominantly grown such as tender fruits (peaches, cherries, 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.

Page 18 of the AIA notes the following: “The study area does not contain specialty crop nor are there special climatic conditions that suggest that this area should be identified as a specialty crop area.”

SAI does not agree with this statement, as will be documented in the following pages of this letter. SAI requests that MHBC address whether to subject land and the SSA provide

the necessary conditions to be considered a Specialty Crop Area as defined in the PPS, 2024.

Agricultural Statistics

Section 2.3 of the AIA does not provide statistics related to potato farming in the Township of Melancthon or County of Dufferin. Background documentation indicates that 17% of the potatoes grown in Ontario are from Dufferin County farmers and in 2021. The Township of Melancthon accounted for 12.76% of potato production in the Province.

The following additional statistics should be summarized for Melancthon and Dufferin:

- Farm cash receipts from potato sales.
- Total number of farms reporting potato farming from 2006 to 2021.
- Total number of acres used for potato production from 2006 to 2021.

Description of Soils

It is noted that the MHBC AIA relies on the soil survey data provided by DBH Soil Services Inc. ("DBH"). A copy of the DBH report was included in the AIA at Appendix B.

The description of the Honeywood Series is non-existent in the AIA and only briefly overviewed in the DBH report. Based on a review of the Soil Survey of Dufferin County (Report No. 38 of the Ontario Soil Survey, 1964).

HONEYWOOD SERIES

The Honeywood soils are found in most of the townships in the county but occur chiefly through the central portion from Honeywood to Orangeville. The largest continuous area is located between Honeywood and Shelburne. These soils occupy 45,200 acres — almost 13 per cent of the total county area.

The Honeywood soils are well drained and have developed in wind-deposited silt loam or fine sandy loam materials which are underlain by calcareous loam till at two to four feet. The till appears to be similar to that of the Harriston soils. The materials overlying the till are remarkably uniform, maintaining an average thickness of three feet even where the topography is rough and short steep slopes prevail. In general, the silty overburden is thicker on the eastern side of the county. These soils occur principally on gently undulating topography except for steeper slopes in an area south of Stanton. The soil surface is usually stonefree but ice-rafted boulders are numerous in a few fields. External drainage is moderate and internal drainage is medium.

Grey-Brown Podzolic characteristics are well expressed in the Honeywood soils. The surface soil is a very dark grayish brown silt loam or fine sandy loam about four inches thick in uncultivated areas. On being cultivated part of the subsurface is mixed with the surface to form a thicker, lighter colored surface layer. The Ae horizons are about 30 inches thick, their yellowish brown color becoming lighter with depth. The Bt horizon is dark brown and is located immediately above

the calcareous loam till. Stones occur only in the till.

The Honeywood soils are among the best agricultural soils in Southern Ontario and are capable of producing all crops adapted to the area. In Dufferin County these soils are used mainly for livestock raising, dairying and potato growing.

Cereal grains, hay, pasture and some silage corn are grown. Large acreages of potatoes are grown in the region around Redickville and Honeywood.

The surface soil is friable, easily worked and contains a good reserve of plant nutrients. These soils drain rapidly and have a sufficiently high moisture holding capacity to supply plants with moisture even during the dry period of the year.

The 1964 Report also notes that “large acreages of potatoes are grown in the vicinity of Honeywood and Redickville” (page 6) and in 1961, 1276 acres of potatoes were farmed in Melancthon. The Township of Melancthon was the single largest potato producing municipality in the County of Dufferin, accounting for approximately 43% of the County of Dufferin’s total production (*adapted from page 45*). Note, this type of information could also be discussed in the Agricultural Statistics section to provide relevant background information.

Unless reported otherwise in the AIA, it is reasonable to conclude that the onsite Honeywood soils would be suitable for potato production.

The AIA provides Figure 4 which illustrates the Canada Land Inventory (“CLI”) Soils Map that shows much of the SSA being comprised of CLI Classes 1-2 soils. However, the AIA does not provide mapping of soil series in the SSA. It is estimated that approximately 41.8% of the SSA (382 ha) includes Honeywood soils. This type of information would be useful in determining the extent of Honeywood soils in the local area.

Agricultural Tile Drainage

The AIA provides the following description of tile drainage in the Primary and Secondary Study Area:

No extensive land improvement investment such as tile drainage, irrigation or other specialized cropping practices or equipment were observed or are documented within the Primary or Secondary Study Areas. (Page 10).

SAI disagrees with this statement. An agricultural drainage map has been adapted from the Provincial AgMaps database (see attachment to this report). Artificial tile drainage and a constructed agricultural drain exists in the SSA.

Preliminary Review of Site Plans

Based on a review of the Site Plans, it is noted that the Licensee proposes to import 7.1 million m³ of excess soil to complete agricultural rehabilitation. SAI requests a copy of the calculations for determining this volume.

It is noted that the soil importation will be completed on lands to be extracted below the water table. The AIA does not describe the process of how the imported soil will be placed, graded and compacted in the areas below the water table. SAI requests an explanation of how the soil will be handled in the areas to be backfilled to ensure a proper growing regime for the rehabilitated agricultural areas on the site.

SAI notes that portions of the site are underlain by till (above the bedrock). It is assumed that the till will not be removed from the site. SAI requests that MHBC confirm whether the onsite till deposit will be removed from the site as a commercial product. SAI requests a soils budget to determine the volume of soil available for rehabilitation.

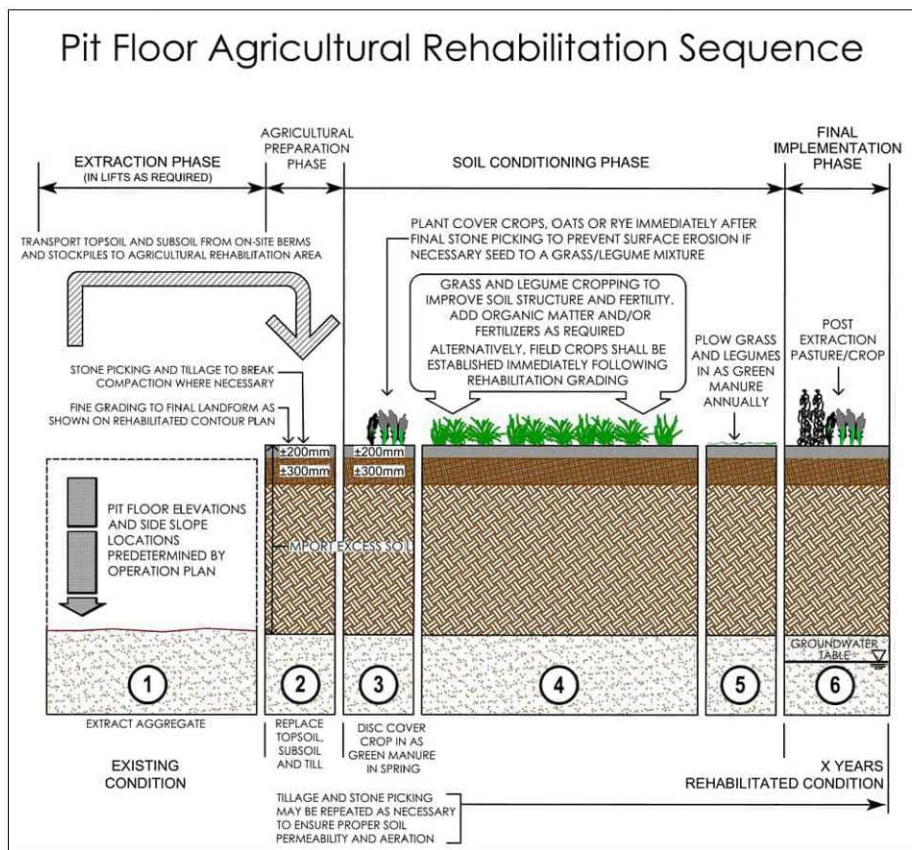
A portion of the site abuts Licence No. 3512. SAI requests confirmation that the proposed grades between the two licensed properties have been coordinated.

It is noted that portions of the site are rehabilitated to a tableland condition. SAI requests confirmation that these lands are restored in such a manner that agricultural rehabilitation in remaining areas of the site is maximized.

The Site Plan recommends a depth of 20 cm and 30 cm for topsoil and subsoil to be placed on the rehabilitated lands. SAI requests a rationale as to how these recommended depths were determined. Reference to the requested Soils Budget should be provided. Note, the Site Plan does not specify that subsoil shall be stripped and piled separately from topsoil and overburden. Given this omission, it is not clear how 30 cm of subsoil will be available for rehabilitation purposes. This should be clarified.

It is noted that approximately 24.2 ha of the site will be returned to an agricultural condition. SAI requests documentation of agricultural rehabilitation utilizing imported excess soils for the purpose of restoring lands to an agricultural condition (in this case, CLI Class 2-3 soils).

The Pit Floor Agricultural Rehabilitation Sequence figure from Page 4 of 5 from the Site Plan has been replicated below.



This figure is different than what SAI is familiar. The main differences relate to:

- Overburden has been replaced with “imported excess soil”.
- There is no reference to deep ripping to relieve compaction essential for proper soil permeability and aeration.
- The fine grading reference should include a note to ensure the proper waer drainage is achieved onsite. This may require ongoing grading once the underlying excess soil layer has settled.
- It is recommended that the onsite till be used above the imported excess soil layer. To determine the proper depth of till to be used, a Soils Budget will be required. This may affect the volume of excess soil that will need to be imported.
- Please explain why it is recommended to plough the grass/legume crop as green manure annually.

It is recommended that the Site Plan include a suggested cropping sequence and a recommended Seed Mix for the rehabilitated farm field.

The AIA sets out the recommendation for an Agricultural Rehabilitation Monitoring Program. This recommendation has been implemented on the Site Plan.

The Agricultural Rehabilitation Monitoring Program recommendation is supportable, however, additional information and clarification is required. The following comments are provided:

- There is no reference to utilizing the pre-extraction information (i.e. soil fertility, bulk density, hydraulic conductivity) on agricultural soils as a benchmark for the agricultural rehabilitation at the site.
- The Monitoring program should provide for adjustments to the cropping practices and/or soil amendments be based on results of soil testing and input from qualified professionals such as a Professional Agrologist and/or a Certified Crop Specialist.
- Further information with respect to the suitability of imported excess soil is required to ensure rehabilitation to an agricultural condition.
- Clarification of the Best management practices shall be implemented with respect to the storage and application of organic material, fertilizers and pesticides is requested. For instance, what organic materials are proposed to be used and why would fertilizers and pesticides be stored onsite?

It is noted that the Agricultural Technical Recommendations do not provide for a complaint protocol process. However, in review of the Site Plan, there are provisions for complaint protocol for water well disturbance. It is recommended that the AIA provide for a specific complaint procedure for farmers (including water, traffic, noise and dust).

In addition, the AIA and Site Plans do not reference a maximum disturbed area requirement prior to initiating progressive rehabilitation. SAI is requesting clarification of why a maximum disturbed area recommendation is not required.

Description of Secondary Study Area

Figure 3 of the AIA illustrates Agricultural Land Uses on the Primary Study Area ("PSA") and the Secondary Study Area ("SSA"). SAI completed a reconnaissance of the Secondary Study Area ("SSA") and confirmed that portions of the SSA appear to be used for potato farming, however different fields were noted than illustrated on Figure 3.

The following comments were recorded based on a review of Figure 3: Agricultural Land Uses:

- Farm No. 7 was recorded as a building used to store agricultural equipment and potatoes. It should be determined if this building is a processing facility for potatoes and/or if the facility has cold storage capability.
- Several fields were noted as being farmed for potatoes in the SSA. Evidence of field irrigation was noted. It should be determined how much of the SSA is part of the normal crop rotation for potatoes. Based on provincial guidance, the AIA should address whether the SSA would meet the conditions of being described as Specialty Crop Area.

- The southern portion of the SSA includes a horse farm that was not identified on Figure 3.
- A livestock facility and a potato farm were noted on 5th Line. These farm properties are included in the SSA, but were not described.

However, on page 18 of the AIA the following statement is reported: *“Overall, 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.”* It is unclear as to the source of this statement: is it from the DBH report or is the source from MHBC? Clarification of this statement is requested considering the prevalence of potato farming in the SSA.

Assessment of Impacts - Agricultural Operations

SAI requests additional information with respect to Farm Operation Nos. 4, 5, 6, 7 and 8. In addition, it would appear that three separate farm operations are located within or in close proximity to the SSA: 625007 15 SIDEROAD (MELANCTHON), 436527 4TH LINE (MELANCTHON), and 397217 5TH LINE (MELANCTHON).

It is recommended that a Farm Data Survey be prepared and delivered to the owners of these farms. The Farm Data Survey should request information related to farm type, number of livestock, size of farm buildings including processing facilities and cold storage. A question should also be prepared that identifies the location of additional owned/rented lands for these farm operations. Finally, the survey should include questions related to concerns related to: the movement of farm machinery, drought and the need to irrigate in the future and dust-related concerns on livestock or crops.

Following receipt of this additional information, it is requested that MHBC discuss the following with specific reference to the relevant technical reports:

- Will the proposed mineral aggregate operation impact the wells for these farm operations? If not, please explain why not with reference to the relevant section in the Hydrogeological Study.
- Will the proposed mineral aggregate operation impact the existing and future routes that are used by these farm operations to access additional rented/owned lands? If the farmer reports a concern with respect to moving machinery on local roads then the relevant section in the Traffic Impact Study should be referenced to address this concern?

Fragmentation of Agricultural Lands

The AIA should describe the ownership and resulting lot fabric on the subject property following rehabilitation and surrender of the licence. The potential for impacts on the adjacent agricultural system should be addressed. Future potential impacts related to MDS 2 setbacks should be evaluated by the agricultural consultant.

Mechanisms to mitigate potential impacts, including the use of agricultural easements, should be evaluated to ensure no future impacts on the agricultural system result from the proposed development.

Appendix B – Soil Survey

Appendix B provides a Soil Survey and Canada Land Inventory Classification for Part of West Half of Lots 12 and 14, Concession 3, Township of Melancthon, County of Dufferin, prepared by DBH Soil Services Inc.

The report provides the results of an onsite soil survey of the subject lands, but also provides planning analysis related to the planning policies relevant at the time of report production in 2017. The agricultural planning analysis is out-of-date and should not be relied upon given that two significant revisions to the provincial planning documents have been approved since the preparation of the MHBC AIA. In addition, the DBH report does not provide any discussion related to adjacent land uses on surrounding lands, in particular potato farming. The DBH report is not an AIA.

SAI is of the view that the only relevant information contained in the DBH report relates to the description of onsite soils and associated CLI-Soil Capability for Agriculture classifications.

Review of Agricultural Policies

Section 5 of the AIA provides an assessment of conformity with agricultural policies contained in the Provincial Planning Statement (“PPS”) 2024, County of Dufferin Official Plan and Township of Melancthon Official Plan. Prior to SAI addressing consistency and conformity with the relevant agricultural planning framework, it is recommended that the technical comments included in this peer review letter be addressed.

Closing

In closing, Stovel and Associates Inc. (“SAI”) completed a peer review of the Agricultural Impact Assessment (“AIA”) in support of an application for a Pit & Quarry Licence in the Township of Melancthon.

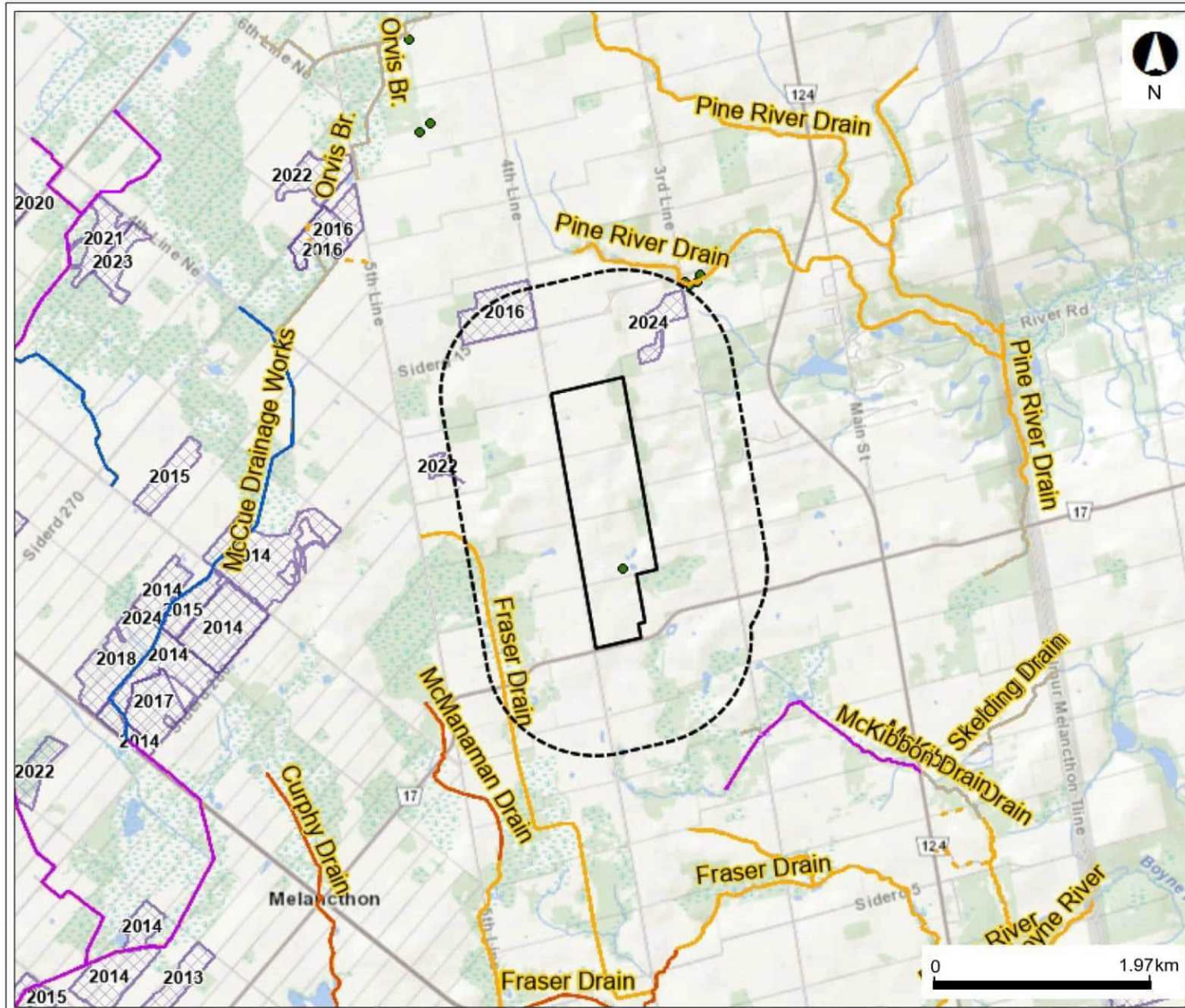
It is important to recognize that an AIA is required to describe the relevant agricultural policies and requirements contained in Provincial Plans, PPS and other applicable requirements such as the Aggregate Resources Act, as well as relevant agricultural policies and requirements contained in county and local official plans and explain how the proposed development is consistent with these policies. The current AIA is deficient in several technical components as documented in this report, and a revised AIA or supplementary report should be prepared to address these deficiencies. Following this, the assessment of consistency and conformity with relevant provisions of the PPS and municipal planning policies can be completed. However, a re-write of the AIA or a supplementary report is viewed as being essential.

At this stage, SAI is of the opinion that the AIA does not meet the requirements set out in the Planning Policy Framework. Further clarification and documentation is required.

Respectfully submitted,

Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P. Ag.

Drainage Map - Strada



Legend

Drain Classification

- A
- B
- C
- D
- E
- F
- Closed/Tiled
- Not Rated

Constructed Drains

- Open or Unknown
- Closed/Tiled

Agricultural Tile Drainage

- Random
- Systematic

- Permits To Take Water

This map should not be relied on as a precise indicator of routes or locations, nor as a guide to navigation. The Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA) shall not be liable in any way for the use or any information on this map, or reliance upon, this map.

436527 4TH LINE
(MELANCTHON)



436527 4TH LINE
(MELANCTHON)



625007 15 SIDEROAD
(MELANCTHON)



625007 15 SIDEROAD
(MELANCTHON)



625007 15 SIDEROAD
(MELANCTHON)



**397217 5TH LINE
(MELANCTHON)**



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