

## Comment Summary – 2781-2809 Townline Rd

### Preconsultation

NPG Planning Consultants	See letter attached
GEI – Township Engineers	See letter attached
County Planning	See letter attached
Hydrogeology	See letter attached
Ecology	See letter attached
Township of Puslinch Fire Department	No comments
Township of Puslinch Building Department	No comments received to date
Township of Puslinch Property Standards & By-law Enforcement	No comments
Township of Puslinch Public Works Department	No comments
Sourcewater	See letter attached
County Transportation Department	No comments – Regional Road
GRCA	GRCA has no objection to the proposed pre-consultation submission. The subject property does not contain any GRCA features. The property is not subject to Ontario Regulation 150/06 and, therefore a permission from GRCA is not required. Please see our resource Mapping attached.
MTO	See letter attached



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June 23, 2025

Lynne Banks  
7404 Wellington Road 34,  
Puslinch, Ontario

Dear Lynne Banks,

RE: **NPG Comments**  
**2781-2809 Townline Road**  
**RE: Preliminary Pre-consultation for Zoning By-law Amendment**

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NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding a preliminary pre-consultation for a proposed development consisting of prestige industrial uses, small-mid bay commercial industrial uses, big box commercial/retail uses and future commercial industrial uses.

The Subject Lands, municipally known as 2781-2809 Townline Road, are approximately 33.05 hectares (330,500 square metres) and have approximately 400 meters of frontage along Ellis Road, as identified through the Explore Wellington online mapping system. The Subject Lands are presently used for agricultural purposes and hosts a development showroom near the southwest corner. Surrounding uses consist of agricultural uses to the north, a golf course to the east, a highway, car parking lot and vacant land to the south, and detached residential development in the City of Cambridge to the west.

The Subject Lands are not within the Grand River Conservation Authority's (GRCA) regulation limit, but the property is within 120 metres of a provincially significant wetland to the north.

This is the first submission for a preliminary pre-consultation. As part of this submission, NPG has reviewed the following document:

- Preliminary Conceptual Industrial Site Plan.

### **Provincial and County Policy**

The Subject Lands are located within Rural Lands as per the Provincial Planning Statement 2024 (PPS). Schedule B7-1 of the County of Wellington Official Plan (County Official Plan) designates the Subject Lands Secondary Agricultural. Section 6.5.3 states that small scale commercial,



NPG Planning Solutions  
4999 Victoria Ave | Niagara Falls, ON L2E 4C9  
[npgsolutions.ca](http://npgsolutions.ca)

(905) 321 6743  
✉ [info@npgsolutions.ca](mailto:info@npgsolutions.ca)

industrial and institutional uses are permitted in Secondary Agricultural areas. Furthermore, Section 6.5.5 of the County Official Plan permits small scale commercial, industrial and institutional uses provided that certain criteria are satisfactorily addressed.

Section 5.6.2 of the County Official Plan requires an Environmental Impact Study (EIS) to ensure the requirements of this Plan will be met, and consider enhancement of the natural area where appropriate and reasonable for development is proposed within 120 metres of a provincially significant wetland.

### **Township Zoning By-law**

The Subject Lands are zoned Agricultural (A) under the Township's Comprehensive Zoning By-law No. 023-18 (Township Zoning By-law). Industrial or commercial/retail uses are not permitted on Agricultural (A) zoned lands according to Section 11.2.

### **Proposal**

From the Preliminary Conceptual Site Plan, it appears that the Applicant is proposing to permit a range of commercial and industrial uses that are labelled as commercial industrial, prestige industrial, small-mid bay commercial industrial and big box commercial retail. The Site Plan appears to also propose one building (150,000 square feet) within the big box commercial/retail portion and two buildings (150,000 square feet and 250,000 square feet, respectively) within the Prestige Industrial portion for industrial, manufacturing and/or warehouse uses. It is unclear whether the Applicant is also contemplating lot creation to accommodate these uses. We require the following information to provide an appropriate evaluation of the proposal:

- Confirmation if the internal dashed lines on the Site Plan represent proposed creation of new lots;
- Confirmation if the Applicant intends to propose a new public road through the Subject Lands where the reference of "road allowance" is on the Site Plan; and
- Provision of a list of uses associated with each portion. We note that "prestige industrial", "small-mid bay commercial" and "big box commercial retail uses" are not defined terms in the Township Zoning By-law.

As commercial and industrial uses are generally not permitted in the Agricultural Zone, a Zoning By-law Amendment application is required to facilitate the proposal. The Applicant needs to provide a Planning Justification Report as part of the Zoning By-law Amendment application, demonstrating that the proposal conforms with the relevant policies of the County Official Plan, particularly Section 6.5.5. We note that the proposal may warrant an Official Plan Amendment if it is deemed to not conform with County OP.

Based on our preliminary understanding of the proposal, we have concern with the proposed uses and scale to be located on Rural Lands and outside of the Employment Areas. The Planning Justification Report needs to elaborate how the proposed Zoning By-law Amendment and/or Official Plan Amendment applications are consistent with the PPS.

If lot creation is proposed, a land division application will be required. The creation of a new public road may necessitate a Draft Plan of Subdivision application.

The Subject Lands are within the Township's Site Plan Control Area and the proposal is subject to a Site Plan Approval application.

Once the requested information is provided, we will be able to advise which *Planning Act* applications are required for the proposal.

### **Technical Comments**

1. The Site Plan needs to provide all information required by the Township to determine necessary zoning relief for the proposed development. At a minimum, the following should be included:
  - a. Legal description of the Subject Lands
  - b. A Zoning Matrix, identifying the Township Zoning By-law's applicable regulations, including General Provisions, and what is provided/ proposed by the proposal;
  - c. Statistics related to the proposed floor areas and the number of parking spaces provided associated with each use for each proposed lot(s);
  - d. All proposed buildings and structures and their setbacks;
  - e. Location of proposed vehicular accesses;
  - f. Layout of the parking and service areas and dimensions of the loading spaces, vehicular parking spaces, bicycle parking spaces, and parking aisle width;
  - g. Landscaping provision required by the Township Zoning By-law; and
  - h. Location of proposed private servicing systems.
2. A Land Use Compatibility study is required to demonstrate the proposed uses do not create adverse effects to the adjacent sensitive use, i.e. the nearby residential area, and to recommend mitigation measures to improve land use compatibility between the properties. The Land Use Compatibility Study should address matters not limited to noise, odour and vibration in accordance with Provincial Land Use Compatibility (D-series) Guidelines.
3. The Applicant needs to provide a draft Zoning By-law instrument that outlines the actual site-specific zoning relief being requested.
4. Trees have been identified along the property boundary and at the southeast corner around the existing buildings on the Subject Lands. We may determine that a Tree Protection Plan is required once an updated Site Plan is available with more information.
5. If outdoor lighting is contemplated, Section 4.15 of the Zoning By-law includes provisions

related to lighting that should be considered at detailed design stage. A Photometric Plan will be required at the Site Plan Application stage.

6. The Township's Puslinch Design Guidelines are applicable to commercial, industrial and institutional development and redevelopment proposals throughout the Township. Subject to the scale of the proposal, a Design Brief may be required to discuss how the proposal has considered and addressed relevant guidelines contained in Puslinch Design Guidelines.
7. As the proposal involves permitting non-agricultural uses, i.e. industrial and commercial uses, on lands designated for agricultural uses, Minimum Distance Separation (MDS) I setback calculation is required.
8. An EIS may be required if proposed development is within 120 metres of the provincially significant wetland. Further confirmation from the Grand River Conservation Authority and the Township's Ecologist is needed to determine if the EIS is required.
9. The following information is available to assist with a submission:
  - a. Municipal Development Standards: [https://puslinch.ca/wp-content/uploads/2022/07/117006-3-Puslinch-Standards\\_FINAL-September-2019.pdf](https://puslinch.ca/wp-content/uploads/2022/07/117006-3-Puslinch-Standards_FINAL-September-2019.pdf)
  - b. Puslinch Design Guidelines: <https://puslinch.ca/wp-content/uploads/2022/07/Puslinch-Design-Guidelines-Feb-2010.pdf>
  - c. Site plan Requirements: [https://puslinch.ca/wp-content/uploads/2020/09/Site-Plan-and-Drawing\\_Guidelines.pdf](https://puslinch.ca/wp-content/uploads/2020/09/Site-Plan-and-Drawing_Guidelines.pdf)

### **Required Plans and Studies**

For a Zoning By-law Amendment Application, the following required plans have been tentatively identified:

- Survey Plan;
- Updated Site Plan;
- Property Index Map and Parcel Registers (including all PIN Printouts and Legal Instruments);
- Planning Justification Report;
- Land Use Compatibility Study;
- Design Brief, if needed;
- Draft Zoning By-law Amendment;
- Tree Protection Plan, if needed;
- Photometric Plan, if needed;
- MDS I Setback calculation; and
- Environmental Impact Study, if needed.

Once a more thorough Site Plan has been submitted by the Applicant and more is understood about the proposal, additional studies and plans may be identified.

Sincerely,



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**Jeremy Tran, MCIP, RPP**  
Manager, Urban Design & Development Planning  
**NPG Planning Solutions Inc.**  
[jtran@npgsolutions.ca](mailto:jtran@npgsolutions.ca)

August 18, 2025

GEI Project No. 2501655 – 125006-010

VIA CLOUDPERMIT: Township of Puslinch

Lynne Banks  
Township of Puslinch  
4704 Wellington Road 34  
Puslinch, ON NOB 2J0

**Re: Pre-Consultation Request  
2781-2809 Townline Road  
Puslinch, ON**

Dear Ms. Banks:

Following our review of pre-consultation application documents received on August 13, 2025, we are providing comments related to a proposed development on the subject lands located at 2781-2809 Townline Road in the Township of Puslinch.

It is our understanding that the proposed development includes a retail store, gas station, and six industrial buildings, with associated parking, and five driveway accesses from Townline Road. The lands are currently zoned agricultural and therefore a zoning bylaw amendment would be required prior to site plan application.

The following documents were received and reviewed:

- Conceptual Site Plan, prepared by Ware Malcomb, dated August 5, 2025.
- Topographical Survey, prepared by J.D. Barnes, dated July 15, 2025.
- Legal Survey, prepared by J.D. Barnes, dated July 15, 2025.

From an engineering perspective, we provide the following requirements in support of a future zoning by-law amendment:

- **Geotechnical and Hydrogeological Studies**, providing information as required to support building design, septic system design, availability of potable groundwater, and stormwater management design.
- **Site Plan**, generally showing proposed (post-development) aboveground and underground infrastructure, including but not limited to, buildings, storage areas, parking areas, driveways, curbs, walkways, lighting, signage, fencing, potable water well, septic system, fire routes, fire protection infrastructure, and any stormwater infrastructure.

- **Existing Conditions Plan**, generally showing any existing infrastructure and services, and any removals.
- **Site Grading and Servicing Plan**, generally showing existing and proposed drainage patterns on the subject lands, confirming legal drainage outlet, and showing proposed infrastructure and services, including but not limited to water lines, septic systems, sanitary sewers, storm sewers and stormwater management facilities.
- **Functional Servicing and Stormwater Management Report**, detailing:
  - The existing conditions of the site and the nature of the proposed development.
  - How the site will be serviced by potable water and wastewater servicing.
  - How stormwater management will be provided for the site including stormwater quality, quantity, erosion control and water balance, as required by Township Standards.
  - Grading and drainage considerations, including overland flow route and legal outlet.
  - Geotechnical and hydrogeological considerations.
  - Transportation considerations.
- **MTO Review**, the applicant is to provide Ministry of Transportation comments to the Township as the subject lands are located adjacent to Highway 401.

In addition to the above, at the time of site plan approval, the following will be required:

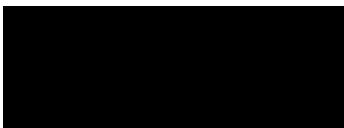
- **Erosion and Sediment Control Plan**, providing provisions for the control of sediment and potential erosion during construction to limit impacts on surrounding areas and infrastructure.
- **Photometric Plan**, demonstrating how the site is to be illuminated in accordance with Township Standards.
- **Landscaping Plan**, designed to illustrate existing and proposed plantings onsite and required restoration works for the property.
- **Spills Management Plan**, to document the control of potential spills on the property.
- **Itemized Construction Cost Estimate**, which includes 15% for engineering and contingencies.

Please note that all engineering drawings and reports shall be stamped by a qualified Professional Engineer.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.  
Project Engineer



## COUNTY OF WELLINGTON

PLANNING AND DEVELOPMENT DEPARTMENT  
Aldo L. Salis, BES, M.Sc. MCIP, RPP Director of Planning and Development  
TEL: (519) 837-2600 ext. 2064  
EMAIL: zacharyp@wellington.ca

ADMINISTRATION CENTRE  
74 WOOLWICH STREET  
GUELPH, ONTARIO  
N1H 3T9

August 18<sup>th</sup>, 2025

Township of Puslinch  
7404 Wellington Road 34  
Guelph, ON N0B 2J0

Dear Ms. Lynne Banks:

**Re: Pre-consultation Request – 2781-2809 Townline Road  
Industrial Development and Major Retail Store**

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Thank you for circulating the request for pre-consultation comments for the above-noted property. It is understood that a pre-consultation was previously held by the Township in 2023 and the County Planning Department had issued preliminary comments dated September 18<sup>th</sup>, 2023.

As part of the most recent pre-consultation, we have reviewed the following submitted items:

- Conceptual Site Plan dated August 12<sup>th</sup> 2025

Based on our review of the above information we offer the following preliminary planning comments for consideration:

**Proposal:**

- The previous proposal was for Industrial / Commercial use with approximately 39.86 acres for Medium Density Residential / Townhomes.
- The revised proposal is for Big Box Retail, gas station and Industrial buildings of various scale.

**General Planning Comments:**

- The subject lands are located outside of an identified settlement area and outside of an identified employment area.
- Section 4.7 Urban-Area Protection prohibits new development adjacent to cities unless it is part of an urban expansion. This request is not understood to be driven by a municipally driven expansion need and would be consider major development.
- Within the County Official Plan, the subject lands are designated as Secondary Agricultural.
- Due to the land use designation, the subject lands form part of the Rural System. Permitted uses within the Secondary Agricultural Area includes all uses permitted in the Prime Agricultural Area; small-scale industrial, commercial and institutional uses and public service facilities. The subject development would not represent small-scale development.



## COUNTY OF WELLINGTON

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PLANNING AND DEVELOPMENT DEPARTMENT  
Aldo L. Salis, BES, M.Sc. MCIP, RPP Director of Planning and Development  
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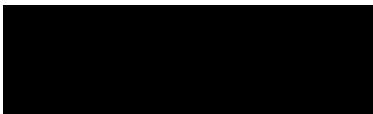
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- Through the County's Municipal Comprehensive Review/5 year review, land needs for employment purposes were identified for Puslinch; however, the Puslinch by Design development project completed a detailed study of employment needs and locations to address additional lands required.
- Within the County Official Plan, Regional retail facilities are only permitted in urban centres.
- Section 11.2.6 Rural System Servicing policies identified that servicing is anticipated to be on private services (septic and well), or private communal systems subject to a Servicing Options Assessment (addressing the policies in Section 11.2.3). The County also prohibits extension of servicing into the Rural System.
- The appropriate road authority will need to review and consider the impacts of this development proposal.
- Source Water Protection comments should be provided to the applicant. It is understood the subject lands are part of a Wellhead Protection Area (D with a vulnerability score of 2) and is identified as an Issue Contributing Area.

Overall, it appears this development proposal requires more than a Zoning By-law amendment. The Provincial Planning Statement (2024) does not appear to provide a clear basis for the proposed development. Further, the County Official Plan seeks to protect and support the Rural System while also protecting cities and urban centres from major fringe development. The Official Plan does not permit the proposed uses.

I trust these comments will be of assistance. If you have questions, please contact the County of Wellington Planning and Development Department.

Yours truly,



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Meagan Ferris, RPP MCIP  
Manager of Planning and Environment

Project: 2501.08 (Township File: D00-CUL)

August 18, 2025

Township of Puslinch  
7404 Wellington Road 34  
Puslinch, Ontario N0B 2J0

**Attention:** Monika Farncombe  
Development and Legislative Coordinator

**RE:** Hydrogeological Comments for Zoning By-Law Amendment Application -  
Preconsultation  
2781-2809 Townline Road, Puslinch, Ontario

Wellington Hydrogeology Ltd. (WHL) is pleased to provide hydrogeological comments on the above-noted submission for 2781-2809 Townline Road, Puslinch, Ontario (the site).

Based on the applicant's submission, we understand that:

- The site is a 34.03-ha (84.10 acres) parcel zoned Agricultural (A). The site currently contains a house, barn, silo and a sales office for Reid Homes on the southwest corner, with crops covering the remaining acreage.
- The site is located immediately north of the Townline Road interchange on Highway 401. The adjacent golf course property to the east is zoned Resort Commercial (RC). Properties to the north (across Ellis Road) and south (across Highway 401) are zoned A. Properties to the west, across Townline Road, are developed commercial and residential lands within the City of Cambridge.
- The proposed Zoning By-law Amendment (ZBA) application is to rezone the site to permit commercial and industrial land uses.
- The proposed concept design includes:

- A gas station;
  - A +/- 15,090 m<sup>2</sup> big box retail store with parking for +/- 950 cars;
  - Three +/- 16,200 m<sup>2</sup> industrial buildings, each with office spaces, parking for +/- 46 trucks and +/- 170 cars; and,
  - Three +/- 10,427 m<sup>2</sup> industrial buildings, each with up to 11 divided units (each 946 m<sup>2</sup>), and parking +/- 170 cars and an unspecified number of trucks.
- Municipal servicing is not available within the Township of Puslinch on the east side of Townline Road. As such, all rural properties in the area are serviced by private water supply wells and septic systems. The urban residential properties on the west side of Townline Road are part of the City of Cambridge and receive municipal water and sewer servicing.

## Documents Reviewed

WHL reviewed the following documents in preparation of these hydrogeological comments:

1. Ware Malcomb. 2025. Conceptual Site Plan, 2809 Townline Road, Cambridge, ON, CA. File TOR25-0087-00, dated August 5, 2025.
2. J.D. Barnes Limited. 2025a. Property Survey, Reference No. 25-14-291-00-A, dated July 15, 2025.
3. J.D. Barnes Limited. 2025b. Topographic Survey, Reference No. 25-14-291-00-B-topo, dated July 15, 2025.

## Support of Application

From a hydrogeological perspective the current application is incomplete. We do not support the application based on the existing supporting documentation.

## Requirements to Consider Support of Application

A Hydrogeological Assessment is required determine support for the application from a hydrogeological perspective. The scope of the hydrogeological assessment must include:

1. Background review of topography, physiography, surficial and bedrock geology, natural heritage features and source protection areas.

2. Determination of shallow groundwater levels and groundwater flow across the site using an appropriate number of monitoring wells to characterize the shallow groundwater system.  
The scope should include:
  - a. Monitoring wells surveyed to a geodetic benchmark.
  - b. Development of all wells to remove fines and improve hydraulic connectivity to the geological formations surrounding the well annulus.
  - c. Slug tests in all monitors to estimate the hydraulic conductivity of each monitoring well.
  - d. Baseline groundwater quality sampling in a minimum of two wells, with samples submitted to an accredited laboratory for analysis of general chemistry, metals, and nutrients.
  - e. Groundwater level monitoring to determine the seasonal high and low groundwater elevations across the site.
  - f. Monitoring of additional existing wells on the site (e.g., supply wells), as practicable.
3. A description of the geology and hydrostratigraphy of the site.
4. Interpretation of the direction of shallow and deep groundwater flow across the site.
5. Assessment of existing nearby groundwater users, including MECP water well records and permits to take water within 500 m of the site, in addition to a door-to-door private well survey within 500 m of the site boundaries to assess existing usage, well construction and depths, and water quality/quantity issues.
6. Water supply assessment for the proposed development based on MECP Guideline D-5-5 Private Wells: Water Supply Assessment to demonstrate adequate water quantity and potable water quality (including general chemistry, metals, nutrients, and bacteriological parameters) for the proposed development.
7. Nitrate attenuation calculations based on MECP Guideline D-5-4 (for sewage flows under 10,000 L/day) or MECP Procedure B-7-1 (for sewage flows over 10,000 L/day).
8. Monthly water balance assessment including pre-development, post-development (without mitigation) and post-development (with mitigation).

9. Soil infiltration testing using a Guelph Permeameter (or equivalent), per the 2012 TRCA Stormwater Management Criteria, completed at appropriate locations and elevations based on proposed infiltration gallery locations.
10. Construction dewatering estimates for the proposed development, including water quantity and quality, proposed discharge location and management/mitigation plans.
11. Impact assessment to existing groundwater users and natural features.
12. The hydrogeological assessment shall be stamped by a licensed Professional Geoscientist or Professional Engineer.

Additional hydrogeological comments are provided below.

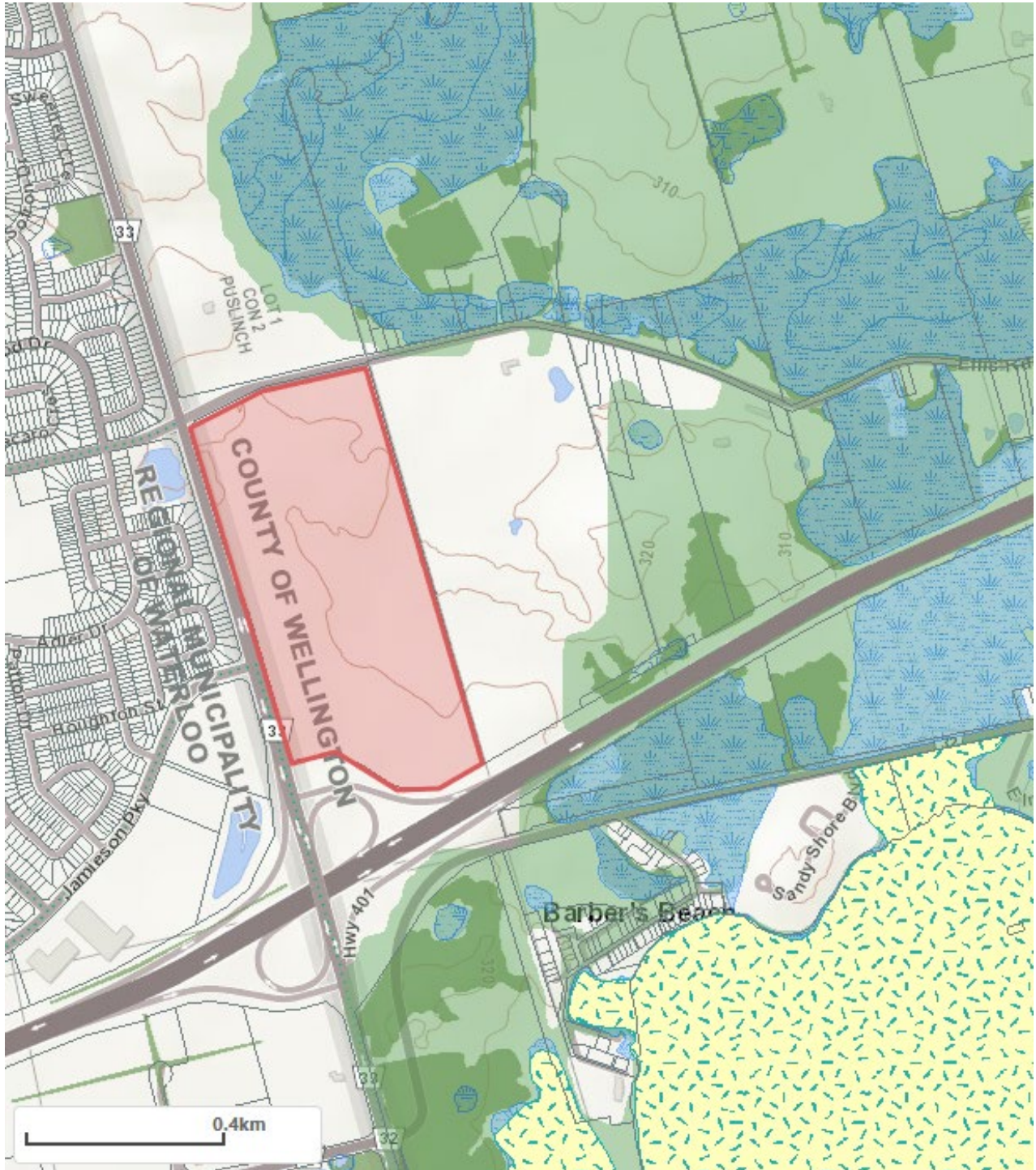
WHL notes that the comments provided herein are preliminary and may be amended following the preconsultation meeting and as additional information is received from the proponent.

## Hydrogeological Technical Comments

**Wellington County Official Plan:** The site is located within the Paris Galt Moraine Policy Area under Schedule B7 of the County of Wellington Official Plan and Section 4.9.7 Policies and Objectives will apply. The development must also adhere to Sections 4.9.3 (Groundwater), 4.9.4 (Policy Direction) and 4.9.5 (Source Water Protection).

**Source Protection:** The site is located in the Grand River Source Protection Area, and is within a Wellhead Protection Area (WHPA)-B/C/D for water quality and a WHPA-Q1/Q2 for quantity. The site is also within a mapped Significant Groundwater Recharge Area (SGRA) and Issue Contributing Area (ICA) for chloride. Source protection staff may have specific requirements based on the site's location within these features.

**Natural Features:** The site topography gently slopes to the north-northeast (J.D. Barnes Limited, 2025b) and is situated within the Ellis Creek – Speed River subwatershed within the Upper Grand River watershed, eventually discharging to Lake Erie. The site does not include any wetlands or surface water features. The nearest wetland features are a mapped approximately 100 m northeast and 150 m southeast of the site, which are both part of the Puslinch Lake Irish Creek Wetland Complex, a Provincially Significant Wetland. Additionally, a mapped Earth Science Area of Natural and Scientific Interest (ANSI) of the Puslinch Lake Bog and Wetlands, a regionally significant ANSI, is located about 480 m south-southeast of the site (see image below). Site development must not adversely impact surrounding natural features.



Source: Ontario Ministry of Natural Resources, Make A Map: Natural Heritage Areas, accessed August 18, 2025.

**Well Decommissioning:** Any unused wells must be abandoned by a licensed well contractor in accordance with R.R.O. 1990, Reg. 903: Wells.

**Supply Well Construction:** The site is underlain by the Guelph Formation and the Goat Island / Gasport Formation aquifer separated by a regional aquitard. Wells that connect these two aquifers (i.e., multi-aquifer wells) are not permitted as part of the development. Newly constructed supply wells for the site should be either installed in the upper bedrock aquifer or appropriately cased into the lower bedrock aquifer, in accordance with R.R.O. 1990, Reg. 903: Wells, to minimize potential groundwater movement between the upper and lower bedrock aquifers.

**Water Quantity and Quality:** A pumping test must be completed on the supply well(s) in accordance with MECP Guideline D-5-5 Private Wells: Water Supply Assessment to demonstrate adequate water quantity and potable water quality (including general chemistry, metals, nutrients, and bacteriological parameters) for the proposed development. A Permit To Take Water (PTTW) is required from the MECP for water takings exceeding 50,000 L/day.

**Wastewater Nitrate Attenuation:** Sewage design flows must be confirmed for the proposed development. For sewage design flows under 10,000 L/day, nitrate loading calculations for the proposed sewage system must be demonstrated in accordance with MECP Guideline D-5-4 as part of Site Plan Approval. Alternatively, sewage design flows that exceed 10,000 L/day require an Environmental Compliance Approval (ECA) from the MECP with a supporting hydrogeological assessment. Note that sewage design flows are cumulative for the site (i.e., if multiple septic systems are proposed on site, the cumulative volume must be considered).

There must be sufficient separation between the leaching bed and the high groundwater table based on the Ontario Building Code.

**Water Balance:** A monthly water balance assessment is required for the existing conditions and proposed development, including pre-development (existing), post-development (without mitigation) and post-development (with mitigation). The proposed design must infiltrate as much clean runoff (i.e., roof runoff) as possible to maintain or enhance existing recharge conditions as part of Site Plan Approval. In situ testing, using a Guelph Permeameter or equivalent (per the 2012 TRCA Stormwater Management Criteria), must be completed at appropriate locations and elevations based on proposed infiltration gallery locations (as part of detailed design).

**Excess Soil Management:** Any import/export of fill/soil from the site must be conducted in accordance with O. Reg. 406/19: On-Site and Excess Soil Management, the Rules for Soil Management and Excess Soil Quality Standards (Soil Rules) and O. Reg. 153/04, as amended.

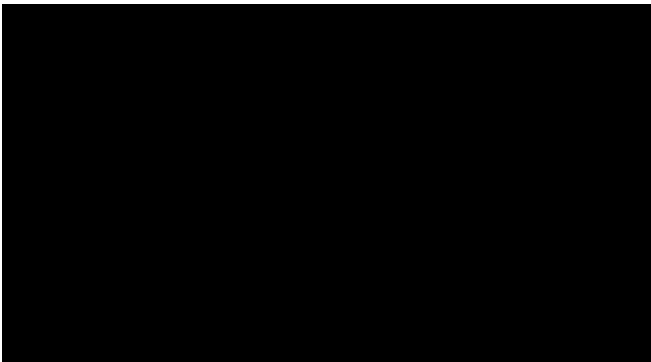
**Hazardous Building Materials:** A designated substance survey is required prior to building demolition and/or renovation activities under Section 30 of the Occupational Health and Safety Act, in accordance with Ontario Regulation (O. Reg.) 490/09: Designated Substances and O. Reg. 278/05: Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations.

## Closure

The hydrogeological technical comments provided herein should be considered preliminary and may be updated as additional supporting materials are provided in subsequent submissions.

We appreciate the opportunity to provide these comments. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

### WELLINGTON HYDROGEOLOGY LTD.



Angela Mason, M.Sc., P.Geo., QP<sub>ESA</sub>

Senior Hydrogeologist and CEO

Cell: 519-831-9696

Email: [amason@wellingtonhydrogeology.com](mailto:amason@wellingtonhydrogeology.com)

August 19, 2025

3625

Township of Puslinch  
7404 Wellington County Road 34  
Puslinch, ON  
N0B 2J0

Attention: Monika Farncombe  
Planning and Corporate Services Coordinator

**RE: 2781-2809 Townline Road, Puslinch, Proposed Zoning Bylaw  
Amendment and Industrial Development  
Peer Review of Pre-Consultation**

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As requested, we have reviewed the Pre-Consultation Application submitted to the Township of Puslinch (the "Township") by Peter Mahovlich in support of the development of six industrial buildings, one retail store, and one gas station at 2781-2809 Townline Road, Township of Puslinch, Ontario ("subject property"). Our comments are set out below.

**Background**

The subject property is located east of Townline Road, north of the Macdonald-Cartier Freeway, and south of Ellis Road in the Township of Puslinch, Ontario. The above request was submitted to the Township of Puslinch in August 2025 identifying the proposed industrial development.

**Reviewed Materials**

In order to complete this assignment, NRSI staff reviewed the following materials:

- Conceptual Site Plan, 2809 Townline Road, Cambridge, ON, CA. Prepared by Ware Malcomb (August 2025);
- Plan of Survey of Part of Lot 1, Concession 2, Township of Puslinch, County of Wellington. Prepared by J.D. Barnes Limited (July 2025);
- Topographic Survey, Part of Lot 1, Concession 2, Township of Puslinch, County of Wellington. Prepared by J.D. Barnes Limited (July 2025);
- County of Wellington Official Plan (last updated May 2025);
- "Make a Map: Natural Heritage Areas", Ministry of Natural Resources (2025);
- Grand River Conservation Authority (GRCA) Regulation Mapping, Grand River Conservation Authority (2025); and,
- Natural Heritage Information Centre (NHIC) database (2025).

**Comments on Reviewed Materials**

Based on our review of the pre-consultation materials, the following comments are provided:

- Both the Ministry of Natural Resources (MNR) mapping (2025) and GRCA regulation mapping (2025) indicate that the subject property is adjacent (within 120m) to the

Puslinch Lake Irish Creek Provincially Significant Wetland (PSW) Complex located to northeast.

- Information available from the Natural Heritage Information Centre (NHIC) indicates records of species of special concern, including Snapping Turtle (*Chelydra serpentina*), Eastern Ribbonsnake (*Thamnophis sauritus*), and Eastern Wood-Pewee (*Contopus virens*), within proximity to the subject property.
- Trees within and directly adjacent to the subject property have the potential to be adversely affected by compacted soils, grading, runoff, and/or mechanical injuries, as well as other impacts associated with future development construction, should appropriate tree protection measures not be applied prior to future construction.
- Existing trees on the subject property may have the potential to provide suitable roosting habitat for Species at Risk (SAR) bats, including, Little Brown Myotis (*Myotis lucifugus*), Northern Myotis (*Myotis septentrionalis*), Tri-colored Bat (*Perimyotis subflavus*), Silver-haired Bat (*Lasionycteris noctivagans*), Eastern Red Bat (*Lasiurus borealis*), and Hoary Bat (*Lasiurus cinereus*). Existing structures (i.e., barns, sheds, houses, etc.) may also be serving as bat habitat.

### **Recommendations**

It is our opinion that the following steps should be taken to evaluate and address impacts associated with the proposed residential development:

- Provide a statement confirming that the adjacent PSW identified in the County Official (2025) and GRCA-regulated mapping will not be negatively impacted as a result of the proposed reconstruction on the subject property. As the PSW adjacent to the subject property is currently bounded by existing roadways, it is unlikely that it will be influenced by future construction activities on the subject property. However, the applicant should confirm that the proposed development will not adversely impact this feature and confirm this with the GRCA.
- Complete a pre-construction tree inventory including all trees >10cm Diameter at Breast Height (DBH) with the potential to be impacted by the proposed development. The findings of this inventory should be used to create a Tree Preservation Plan (TPP) that contains suitable tree protection recommendations, such as tree protection fencing in combination with Erosion and Sediment Control (ESC) measures or other measures to ensure that trees will not be negatively impacted by the proposed development and associated construction. Should existing trees require removal as a result of changes in existing grade, excessive fill, conflicts with the development footprint, or other impacts associated with the proposed development, these trees should be identified. Impacts to associated wildlife habitat, if present, as well as the replacement of trees through compensation should also be considered.
- Written consent from the adjacent landowner(s) will be required prior to the injury or removal of any boundary trees, defined as trees with stems that overlap the property boundary, where such removal or injury is necessary to facilitate construction.
- Confirmation on the presence or absence of bat habitat should be provided, supported by an assessment of the potential for habitat within trees or structures (e.g., house, barn, shed) located on the subject property. Should candidate habitat for SAR bats be identified, consultation with the Ministry of the Environment, Conservation and Parks (MECP) may be required.

- Provide mitigation measures within the TPP to minimize potential impacts to bats and nesting birds, and confirm compliance with the MECP. Mitigation measures may include the requirement for tree removals to be completed outside of the combined bat maternity roosting season and bird nesting season (April 1st – November 30th).
- As part of any future site alteration within the subject property, ESC measures should be applied prior to and during construction. These measures should be identified in adequate detail to demonstrate that the risk of runoff and sedimentation will not be impacted adjacent to natural features during construction.

Please do not hesitate to contact us if you require further clarification on these matters.

Sincerely,  
Natural Resource Solutions Inc.



Jack Richard, R.P.F.  
Terrestrial Biologist and Registered Professional Forester



Sydney Gilmour, M.Sc.  
Terrestrial and Wetland Biologist



# Restricted Land Use Notice No Prohibition or Risk Management Plan Requirement

## **Issued under the *Clean Water Act*, Section 59 (2) (a)**

**Notice Number:** PUS-S59-25-008.

**Description and Date of Application/Supporting Documents:** Zoning By-law Amendment, August 13, 2025 / Drawings, Preconsultation application, WHPA Maps

**Applicant:** Todd Cullen

**Email:** todd@fieldgateproperties.com

**Roll Number:** 230100000202900 **WHPA:** IPZ-3, WHPA-B, WHPA-C, WHPA-D, ICA, WHPA-Q1, WHPA-Q2

**Vulnerability Score:** 6, 5, 4, 2, Chloride **Threats:** Sewage System Or Sewage Works - Discharge Of Untreated Stormwater From A Stormwater Retention Pond, Sewage System Or Sewage Works - Industrial Effluent Discharges, Application Of Road Salt, Storage Of Road Salt, Storage Of Snow, Handling Of A Dense Non Aqueous Phase Liquid (DNAPL), Storage Of A Dense Non Aqueous Phase Liquid (DNAPL), Water Taking Threat, Recharge Reduction Threat

**Property Address:** 2781-2809 Townline RD **Town:** Puslinch

**Municipality:** Township of Puslinch **Province:** Ontario **Postal Code:** N3C 4L9

**Source Protection Plan:** Grand River **Drinking Water System:** Waterloo

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### **Property Owner Information**

Fieldgate Properties c/o Todd Cullen

5400 Yonge Street

Unit 300

Toronto, Ontario

M2N 5R5



This Notice is being issued under subsection 59 2(a) of the Clean Water Act, 2006 and was prepared in response to an Application (as described above under Description / Supporting Documents) received for the property that is identified above. One or more of the land uses proposed to be engaged in, at the above noted property, has been designated as a restricted land use under Section 59 of the *Clean Water Act* and the application is either for a provision of the *Planning Act* prescribed under Section 62, Ontario Regulation 287/07 of the *Clean Water Act* or for a building permit under the *Ontario Building Code*.

The Application was reviewed in accordance with the *Clean Water Act* and the Grand River Source Protection Plan as amended. Based on the information submitted as part of the Application, Section 57 (Prohibition) or Section 58 (Risk Management Plan) of the *Clean Water Act* **do not** apply, at this time, to the activities outlined in the Application for the above referenced property.

**Rationale:** This Notice pertains to a Zoning By-law Amendment application submitted for 2781-2809 Townline Road, Puslinch. To deem the ZBA application complete, a Section 59 (2) (a) Notice is being provided. Please note that a Risk Management Plan (RMP) will be required for this site and will include, but is not limited to, winter maintenance activities and chemical handling and store. Comments pertaining to the RMP and Source Protection requirements will be provided during future planning applications.

- This Notice is only effective as it relates to the above referenced Application
- Any change to the information submitted under the Application nullifies this Notice, unless otherwise permitted by the Risk Management Official.
- This Notice is not valid for any subsequent approvals under the *Planning Act* or building permits under the *Ontario Building Code* for the property. Further Section 59 notices will be required for subsequent applications at the property and a risk management plan may be required.
- Pursuant to Section 53 (3), Ontario Regulation 287/07 under the *Clean Water Act*, this notice, once issued, is a public document. All information submitted for development of this notice is subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).



This Notice has been issued under the Authority of the Risk Management Official appointed for the Township of Puslinch under by-law 62/15. This Notice has been issued in accordance with the *Clean Water Act*, 2006, Section 59, Ontario Regulation 287/07 and the Grand River Source Protection Plan as amended.

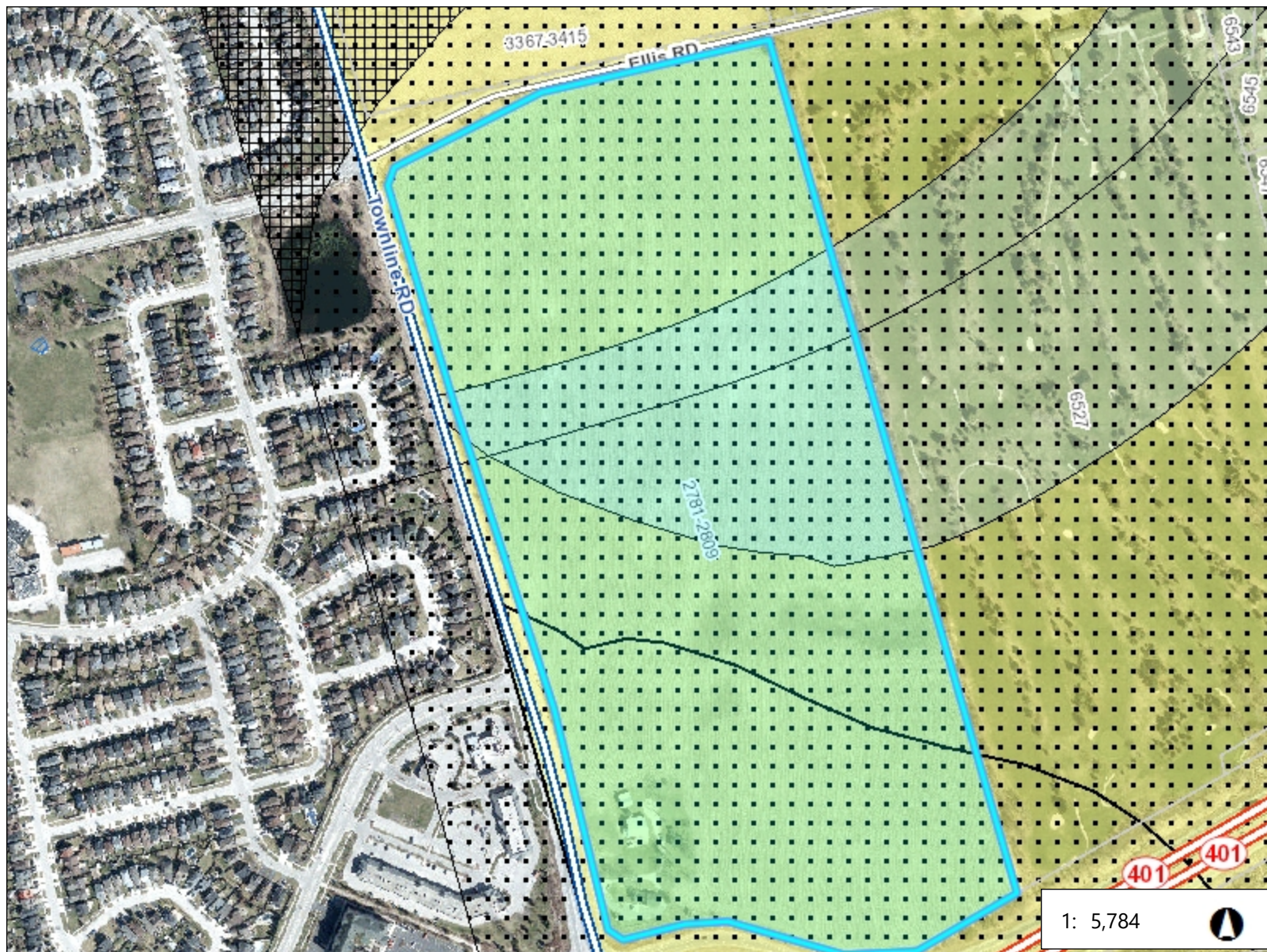
If you require further information, please contact the undersigned.

2025-08-18

[REDACTED]  
Kyle Davis, Risk Management Official  
519-846-9691 ext. 362  
[kdavis@centrewellington.ca](mailto:kdavis@centrewellington.ca)

Attachment(s): WHPA Map(s)

Wellington Source Water Protection is a municipal partnership between Township of Centre Wellington | Town of Erin | Guelph / Eramosa Township | Township of Mapleton | Town of Minto | Township of Puslinch | Township of Wellington North | County of Wellington. The purpose of the Clean Water Act is to protect existing and future sources of drinking water.



Legend

- Parcels
- Roads**
  - Local Road
  - County Road
  - Highway
- Well Locations**
  - Existing
  - Proposed
- Issue Contributing Area**
  - Chloride
  - Nitrate
  - Sodium
  - TCE
- Wellhead Protection Area**
  - A
  - B
  - C
  - D
- Vulnerability Score**
  - 10
  - 8, D; 8; 8, C
  - 2, 4, 6 (A, B or C)
  - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- HVA
- RoadsLookup
- Prime Agriculture

0.3 0 0.15 0.3 Kilometers

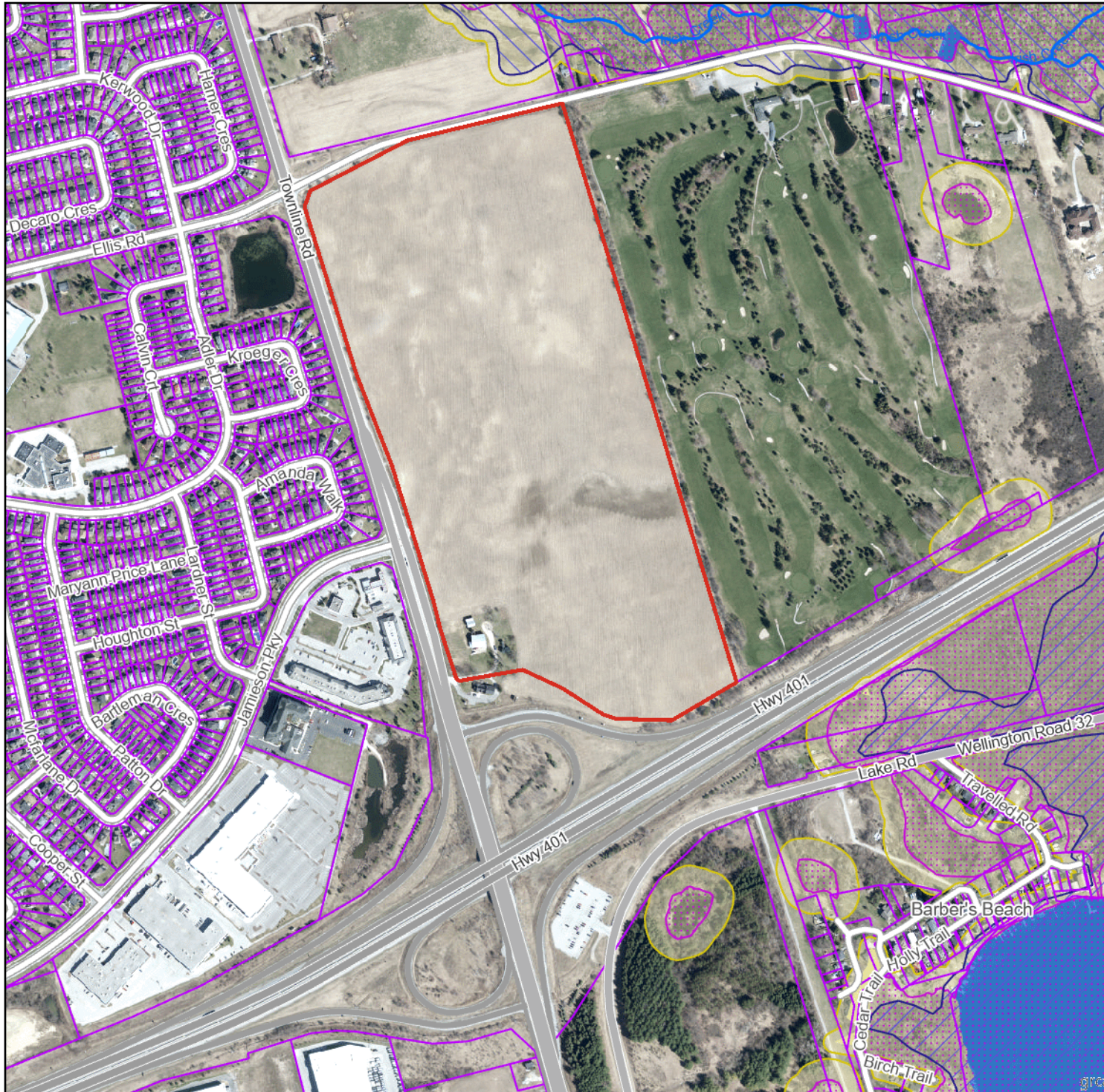
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

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THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2025

Notes





Legend

- Regulation Limit (GRCA)
- Floodplain (GRCA)
  - Engineered
  - Estimated
  - Approximate
- Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)
  - Steep
  - Oversteep
  - Toe
- Slope Valley (GRCA)
  - Steep
  - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- Conservation Area Boundary (GRCA)

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Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user.

The source for each data layer is shown in parentheses in the map legend. See Sources and Citations for details.



**Ministry of Transportation**

West Operations  
Corridor Management Section West

659 Exeter Road  
London, Ontario N6E 1L3  
Telephone: (226) 973-8580  
Facsimile: (519) 873-4228

**Ministère des Transports**

Opérations ouest  
Section de la gestion des couloirs routiers de l'Ouest

659, chemin Exeter  
London (Ontario) N6E 1L3  
Téléphone: (226) 973-8580  
Télécopieur: (519) 873-4228



August 13, 2025

**To: Monika Farncombe, Township of Puslinch**

**Re: Pre-consultant - 2781-2809 TOWNLINE RD.**

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The Ministry of Transportation (MTO) has completed its review of the concept plan prepared by Ware Malcomb dated 08-05-2025 for property located at 2809 Townline Road, Puslinch. The concept plan has been considered in accordance with the requirements of our highway access control policies and the *Public Transportation and Highway Improvement Act* (PTHIA). MTO's Highway Corridor Management Manual (HCMM) and all related guidelines and policies. The following outlines our comments:

The site is adjacent to Highway 401, a Class 1A - Freeway with a posted speed limit of 100km/h, that is designated as a Controlled Access Highway (CAH). As such, all requirements, guidelines and best practices in accordance with this classification and designation shall apply.

The owner should be aware that the property falls within MTO's Permit Control Area (PCA), and as such, MTO Permits are required before any demolition, grading, construction or alteration to the site commences. In accordance with the Ontario Building Code, municipal permits may not be issued until such time as all other applicable requirements (i.e.: MTO permits/approvals) are satisfied.

**Site Access.**

The subject property's proposed access does not meet MTO's desirable offset spacing requirement of 800m for a new commercial access connection from an existing commercial access, public road or interchange. MTO will require that access be achieved from Ellis Road.

**Building and Land Use.**

MTO Building and Land Use Permit will be required. As a condition of MTO permits, the following shall be provided:

- The Proponent shall submit an acceptable Site Plan, Grading Plan, Drainage Plan, Illumination Plan, Erosion Control Plan and Site Servicing Plan for MTO review and approval. These plans shall clearly identify all structures/works (existing and proposed). MTO requires all buildings, structures and features integral to the site

to be located a minimum of 14 metres from the highway property limit, inclusive of fire-lanes, parking and stormwater management facilities.

### **Traffic Impact Study.**

MTO will require the owner to submit a Traffic Impact Study to MTO for review and approval, indicating the anticipated volumes of traffic and its impact upon the provincial highway network.

- The TIS will be prepared by a Registry, Appraisal and Qualification System (RAQS) qualified transportation consultant in accordance with MTO TIS Guidelines attached.
- The MTO list of Prequalified Engineering Service Providers (ESPs), completing Traffic Impact Analysis is publicly available on [MTO Technical Documents](#) website, under Qualifications.
- MTO will be available to review the TIS scope of work once prepared, to ensure MTO concerns are addressed.
- Should Highway improvements be identified as warranted and as a condition of MTO permits, the improvements will be designed and constructed to the standards and approval of MTO at the cost of the developer.

### **Storm Water Management Report (SWMR).**

As a condition of MTO permits, to ensure that stormwater runoff from this property does not adversely affect our highway drainage system or highway corridor, an SWMR will be required and will need to adhere to the MTO Stormwater Management Requirements for Land Development Proposals and utilize the MTO Intensity Duration Frequency (IDF) Curves.

- The drainage engineer/consultant should refer to the ministry website for applicable IDF curves, Highway Drainage Design Standards (2008) and the ministry's Stormwater Management Requirements for Land Development Proposals. <https://idfcures.mto.gov.on.ca/terms.shtml>
- The drainage engineer/consultant shall ensure that all return periods are assessed (2yr, 5yr, 10yr, 25yr, 50yr, 100yr and Regional).

The Ministry of Transportation reviews the conveyance of flows based on the Ministry's Stormwater Management Technical Guidelines only. The developer must obtain all necessary approvals from other jurisdictional agencies.

### **Signs**

Any/all signage visible from Highway 401 including temporary development signs, must be identified on the plans, must conform to MTO policies and guidelines, and will require a valid MTO Sign Permit before installation. The minimum Commercial Signage setback is 3.0m.

If you have any questions, please do not hesitate to contact me directly.

Regards,

O'Neil Nembhard  
Corridor Management Planner  
Highway Corridor Management Office  
West Region