

# **Affidavit**

Township of Puslinch 7404 Wellington County Rd 34, Puslinch, ON NOB 2J0 (519) 763-1226

Cloudpermit application number CA-3523001-P-2025-83

Applicant					
Last name Baker	First name Caroline		Corporation or partnership Baker Planning Group		
Street address PO Box 23002	Unit number		Lot / Con.		
Municipality Stratford	Province Ontario		Postal code N5A 7V8		
Other phone		Mobile phone +1 2269211130			
Fax		Email caroline@bakerpg.com			

Property owner, Payer					
Last name Fisher	First name James		Corporation or partnership		
Street address P.O. Box 26076	Unit number		Lot / Con.		
Municipality Mississauga	Province ON		Postal code L5L 5W7		
Other phone		Mobile phone			
Fax		Email			

Subject Land Information					
	Address	Legal description	Roll number		
	6542-6584 GORE RD (Primary)	GORE FRONT PT LOT 2 LOTS 3-4	2301000003001000000		

#### **Sworn Declaration of Applicant**

Complete in the presence of a Commissioner for taking affidavits

I, Baker Planning Group (Caroline Baker), solemnly declare that the information required under Schedule 1 to Ontario Regulation 545/06 and provided by the Applicant is accurate and that the information contained in the documents that accompany this application is accurate, and I make this solemn declaration conscientiously believing it to be true, and knowing that it is of the same force and effect as if made under oath and by virtue of the Canada Evidence Act.

Signature of Applicant (sign in the presence of a Commissioner for taking affidavits)

Signature of Commissioner for taking affidavits

of termination of termina

Municipality
City of Stratford

Day, month, year September 15, 2025

Place an imprint of your stamp below



#### Affidavit and signatures

#### **Applicant**

The Caroline Baker, Applicant is required to agree to erect and maintain a sign on the subject lands and to permit Township employees/representatives to enter the lands for site visits. The sign will be provided to the applicant for posting on the property by Township planning staff along with instructions on how and where to post the sign. The sign must be posted at least 10 days prior to the Committee of Adjustment meeting date for the application and must remain on the property until the 20 day appeal period is expired.

#### Notice with respect to collection of personal information

Personal information on this form is collected under the authority of the Planning Act. The information is used for the purpose of processing this application and administering the legislation and is maintained in accordance with the Municipal Freedom of Information and Protection of Privacy Act. Questions regarding the collection of this information may be directed to the Township Clerk's office.

The Township of Puslinch is committed to providing accessible formats and communication supports for people with a disability. If another format would work better for you, please contact the Township Clerk's office for assistance.



Digitally signed on 2025-09-15, 1:38:06 p.m. EDT by Caroline Baker.

Send correspondence to					
Send correspondence to					
Owner(s) Agent Others					
Who to send the Invoice to					
Owner Agent		Other			
Provide a description of the "en	tire" prope	rty			
Concession CONCESSION GORE		Lot Part Lot 2, 3 & 4		Registered Plan Number N/A	
Area in Hectares 97.57		Area in Acres 241.1		Depth in Meters Varies	
Depth in Feet Varies	Frontage 808	in Meters	Frontage in Feet 2650		Width of road allowance (if known)
varies	000		2000		20
Reason for Application					
Please indicate the Section of th	e Planning	Act under which this a	pplication is being mad	de	
Section 45(1) relates to a ch	ange to a b	y-law standard (e.g. se	etbacks, frontage, heig	ht, etc.)	
Section 45(2) relates to a ch	ange to or	expansion of an existin	ng legal non- conformi	ng use	
What is the nature and extent of the relief that is being applied for?			Why is it not possible to comply with the provisions of the by- law?		
Notwithstanding Section 4.24 of the Zoning By-law, shipping containers may be used for the purposes of accessory structures to provide noise attenuation and are exempted from the provisions in Section 4.24.2, provided the shipping containers do not exceed a height of 8 metres.		The existing by-law does not provide the clarity on the use of shipping containers for a noise wall.			
What is the current Official Plan and zoning status?					
Official Plan Designation			Zoning Designation		
"Secondary Agricultural", "Core Greenlands" and "Greenlands" on Schedule B7 (Land Use – Puslinch); Paris and Galt Moraine Policy Area on Schedule C7 (Source Water Protection – Puslinch)			Agricultural Site-specific Zone (A(sp4))" and "Natural Environment" with an Environmental Protection Overlay		
What is the access to the subjec					
Provincial Highway Continually Seasonally maintained municipal road municipal road					
Other [	Continu county	ally maintained road			
What is the name of the road or street that provides access to the subject property?  Gore Road		If access is by water only, please describe the parking and docking facilities used or to be used and the approximate distance of these facilities from the subject land to the nearest public road.  N/A			

Existing and Proposed Service					
Indicate the applicable water supply and sewage disposal:					
Private Well			<b>✓</b> Existing	Proposed	
Communal Water				Proposed	
Provincial Water Taking Permit			Existing	Proposed	
Private Septic			<b>Existing</b>	Proposed	
Communal Septic			Existing	Proposed	
Other Provincial Waste Water System	Other Provincial Waste Water System			Proposed	
How is storm drainage provided? *  ☐ Storm Sewers ✓ Ditches ☐ Swales ☐ Other means					
Existing Subject and Abutting Property La	nd Uses, Buildings and	d their Locations			
What is the existing use of the subject property? Recreational and Professional Club		What is the existing use of the abutting properties? Rural residential; open space			
Provide the following details for all existin	g buildings on the sub	ject land			
Main Building Height in Meters 6	Main Building Height in Feet 19.6		Percentage Lot 0	Percentage Lot Coverage in Meters 1%	
Percentage Lot Coverage in Feet 1%	Number of Parking S 100	paces	Number of Loadi 1	Number of Loading Spaces 1	
Number of Floors 2	Total Floor Area in Square Meters 465		Total Floor Area i 5000	Total Floor Area in Square Feet 5000	
Ground Floor Area (Exclude Basement) in S 465	Square Meters Ground Floor Art 5000		a (Exclude Basement) in Square Fee		
Provide the following details for all buildings proposed for the subject land					
Main Building Height in Meters N/A	Main Building Height in Feet N/A		Percentage Lot 0 <1%	Percentage Lot Coverage in Meters <1%	
Percentage Lot Coverage in Feet <1%	Number of Parking Spaces N/A		Number of Loadi N/A	Number of Loading Spaces N/A	
Number of Floors N/A	Total Floor Area in Square Meters N/A		Total Floor Area in Square Feet N/A		
Ground Floor Area (Exclude Basement) in S N/A	Equare Meters Ground Floor Are		a (Exclude Basement) in Square Fee		

What is the location of all buildings existin lot lines)	g and proposed for the	e subject property? (s	pecify distances from front, rear and side	
Front Yard in Meters 46	Front Yard in Feet 160		Rear Yard in Meters 340	
Rear Yard in Feet 1115	Side Yard (interior) in Meters 19		Side Yard (interior) in Feet 62	
Side Yard (Exterior) in Meters N/A	Side Yard (Exterior) i N/A		n Feet	
What are the dates of acquisition and cons	struction of subject pr	operty and building p	roperty	
Date of acquisition of subject property 1954	Date of construction of buildings property 1954 forward		How long have the existing uses continued on the subject property? Since 1954	
Has the owner previously applied for relief i subject property?	n respect of the			
☐ Yes ✓ No				
Other Related Planning Applications				
Planning Application: Official Plan Amendment		Planning Application: Zoning By-Law Amendment		
☐ Yes ✔ No		☐ Yes ☑ No		
Planning Application: Plan of Subdivision		Planning Application: Consent (Severance)		
☐ Yes ✔ No		☐ Yes ☑ No		
Planning Application: Site Plan		Planning Application: Minor Variance		
✓ Yes  No  Yes  No				
Site Plan: File Number Concurrent	Site Plan: Approval A Township of Puslinch	=	Site Plan: Subject Lands Subject Lands	
Site Plan: Purpose  To permit the construction of the noise wall	uction of the noise wall		Site Plan: Status To be submitted concurrently	
Minor Variance Application must be commissioned				
Please confirm the following				
I understand that prior to the Minor Variance Application being deemed complete it must be commissioned by all registered owners or the agent responsible for the application.				



133 REGENT STREET STRATFORD, ON N5A 3W2 519.305.5727 gritengineering.ca

September 12, 2025

Project Number: GE25-1221-1-E-TM-R0-2025-09-12

James Fisher Sportsmens Club Galt 6542 Gore Rd Puslinch, ON, N1R 8K2

# Technical Memo (TM) Trap/Skit Range Noise Mitigation Design 6542 Gore Rd, Cambridge

GRIT Engineering Inc. (GRIT) was retained by Sportsmens Club Gals (Client) to design noise mitigation for the Trap/Skit Range Area (Site) at 6542 Gore Rd, Cambridge. The Site is comprised of five (5) trap and skit fields as well as one (1) five stand field. A Key Plan is attached as Figure 1.

# **Data Acquisition**

GRIT attended the Site on June 4, 2025 to obtain sound level measurements for gunshots during trap/skit activities. A variety of guns were measured from different locations around the Site to characterize the source.

Measurements were completed in accordance with MECP documents Publication NPC-102 – Instrumentation (NPC-102) and Publication NPC-103 – Procedures (NPC-103). All measurements were obtained using a Larson Davis Model 831C Class 1 Sound Level Meter that complies with the requirements of NPC-102. Full 1/3 octave band Sound Pressure Level (SPL) measurements were made. Measurements in different locations around the noise sources were made to provide directionality to the noise sources.

#### **Assessment Methodology**

Noise impacts for stationary sources were predicted using SoundPLAN noise prediction software. All predictions for noise impacts at points of reception were calculated using ISO 9613-2:2024, as required by NPC-300.

A local topographic survey of the Site was completed on June 17, 2025 to provide elevation data for the localized area around the Site. After mitigation design, grading details were developed and applied to the mitigation wall and utilized in the model. Terrain data outside of the surveyed area was obtained from the Ontario Digital Terrain Model (Lidar-Derived). Elevation data from all sources was combined in the model and utilized to generate a Digital Ground Model (DGM) for the calculation area.



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The most proximal Points of Reception (PORs) were chosen in the southwest, south, and east to evaluate noise impacts from the Site and inform mitigation design.

#### **Impact Assessment Criteria**

The noise impact criterion is obtained from the Corporation of the Township of Puslinch draft By-law to regulate, prohibit, and otherwise control noise from shooting ranges in the Township of Puslinch (Draft Noise By-Law). According to the Draft Noise By-Law the maximum permitted sound level is 70 dBAI Logarithmic Mean Impulse Sound Level (LLM). This criterion was used to evaluate noise from the Site and efficacy of noise mitigation options.

# **Noise Mitigation Design**

Several options were considered in the development of the appropriate noise mitigation for the Site including earth berm and traditional noise walls. After consideration of all factors it was determined that the most appropriate mitigation option is the implementation of a sealed container wall between the shooting area of the Site and the driveway access space.

Due to the height requirements for mitigation, the construction of an earth berm would have annexed much of the areas currently utilized by the Site for access. Additionally, design of the earth berm required areas regulated under the Grand River Conservation Authority to be impacted. As such, an earth berm was deemed infeasible. A traditional noise barrier wall was also considered. Although this option would have achieved the necessary mitigation targets, comparison of the cost of construction with the sealed container option rendered this not economically feasible. It was also noted that sealed containers were readily available and speed of construction would be maximized.

## **Mitigation Construction**

The first section of the sealed container wall is 146.4m, running approximately north to south, extending from Field 2 to Field 5. The second section is 36.6m, running northwest to southeast, running along the southern limit of Field 5. Both sections of the noise mitigation wall are constructed using standard 40' seacans (12.19m long, 2.44m wide, 2.59m high) stacked two (2) seacans high, with a final finished height of 5.18m from finished grade.

A figure showing the Site Plan and Grading for the seacan structure is included as Figure 2.



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#### **Conclusions**

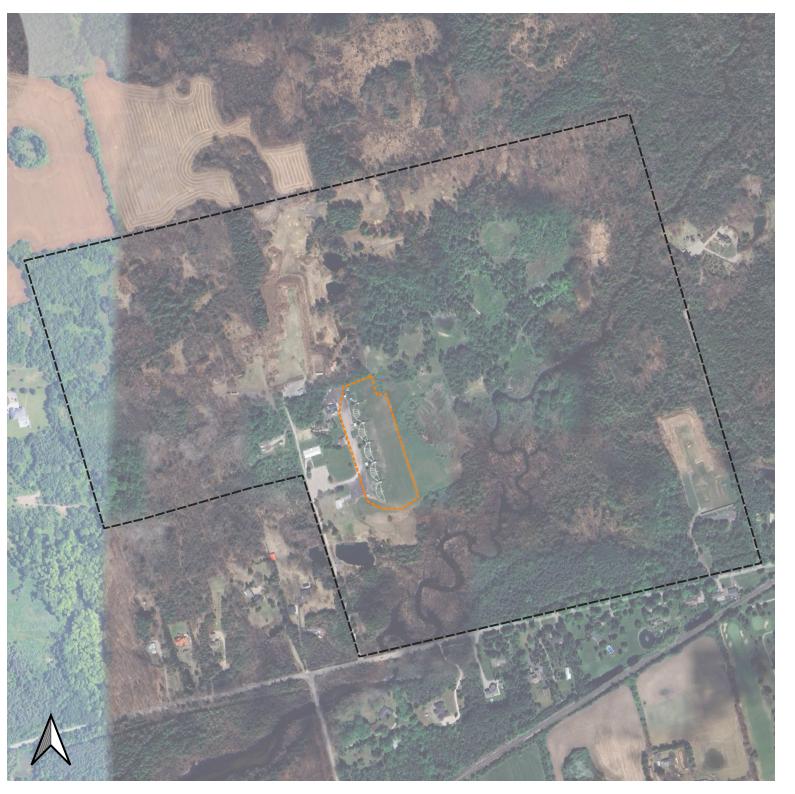
Based on the measured noise levels and acoustical modelling, it is GRIT's opinion that noise impacts at the nearest PORs will meet the maximum permitted sound level of 70 dBAI Logarithmic Mean Impulse Sound Level (LLM)

We trust this information satisfies the existing requirements. However, if you have any questions or concerns, please do not hesitate to contact GRIT.

Spencer Bannon, PENG, QPESA Environmental Services Director spencer@gritengineering.ca

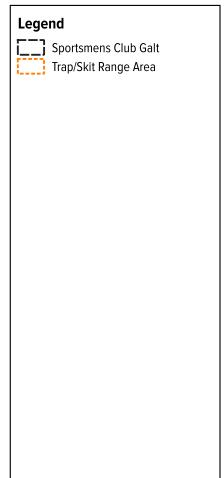
Encl. Figure 1 – Key Map

Figure 2 – Site and Grading Plan



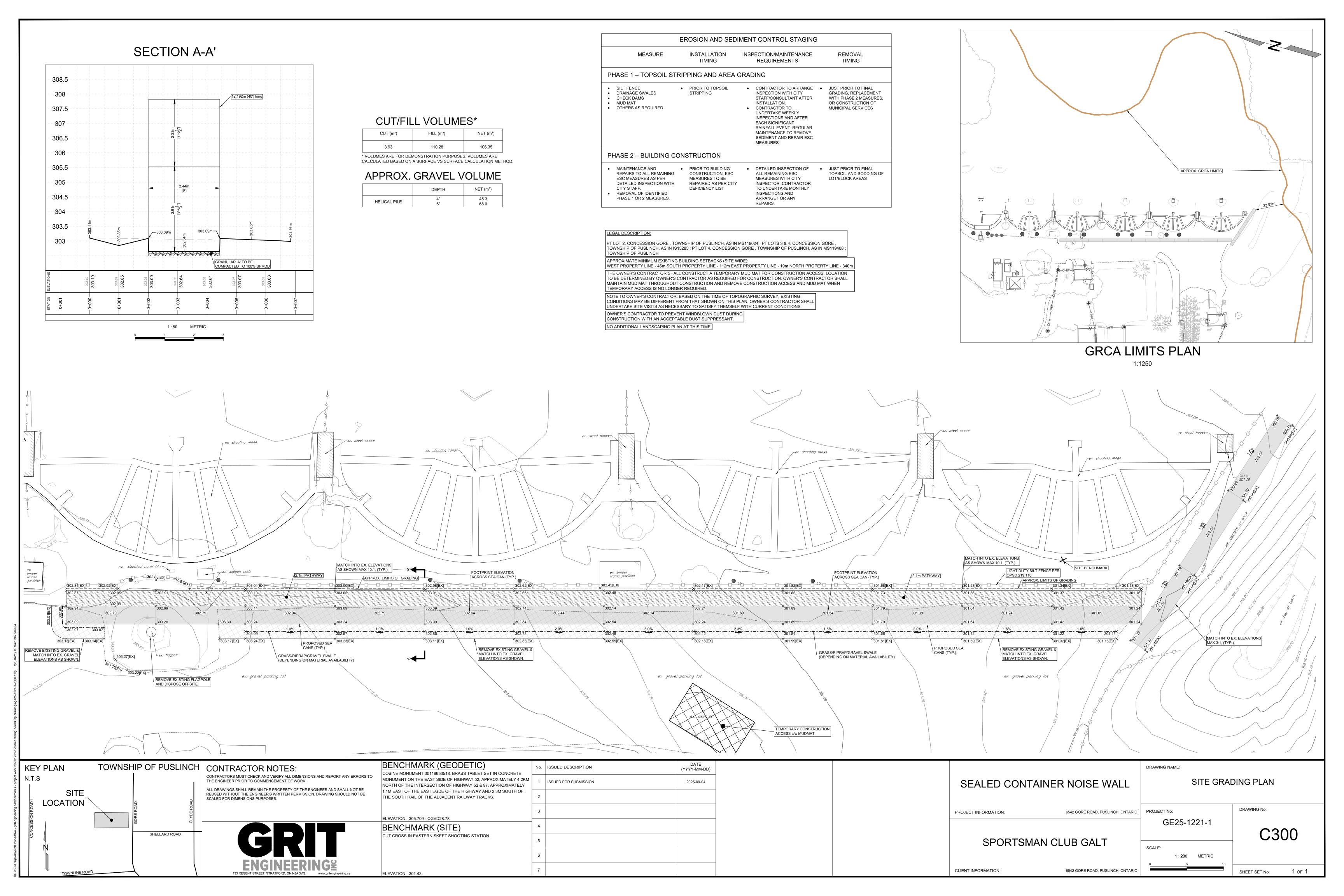
# Figure 1

Key Map



0 100 200 300 400 m







# SCG

# Sealed Container Noise Wall Elevation and Line of Sight

# Legend



Sealed Container Wall with
Top Wall Elevations (m)



Off-Site Building



Location of Photos (Attached)
Reference number indicated

#### DTM

 Approx. Ground Elevation (m) (LIDAR)

#### **DSM**

 Approx. Tree Top Elevation (m) (LIDAR)

0 50 100 150 200 m















Baker Planning Group PO Box 23002 Stratford Stratford, ON N5A 7V8



File No.: 2025-29

September 12<sup>th</sup>, 2025

Ms. Justine Brotherston Interim Director of Corporate Services/Municipal Clerk Manager of Corporate Services/Deputy Clerk Township of Puslinch 7404 Wellington Rd 34 Puslinch ON NoB 2Jo

RE: Minor Variance Application
The Sportsman's Club Galt Ltd.
6542-6584 Gore Road, Township of Puslinch, County of Wellington

On behalf of The Sportsman's Club Galt Ltd. ("Owner"), we are pleased to submit a Minor Variance Application ("Application") for land known municipally as 6542-6584 Gore Road, Township of Puslinch, County of Wellington ("Site"). The Site is legally known as Part Lot 2, 3 and 4, Concession Gore, Township of Puslinch, Wellington County.

The purpose of the Application is to permit the construction of a noise wall, comprised of stacked sealed containers for the trap/skeet area on the Site ("Proposed Development"). The proposed noise wall will be constructed on a portion of the Site that is already developed for use by the club.

The Sportsmen Club Galt has continuously operated on the Site since its founding in 1954 and provides for the recreational and professional use of guns, with target practice areas. The Sportsmen Club Galt also offers archery and fishing on the Site. There are approximately 2,000 members, and the facility operates as follows:

- Rifle and handgun areas are open weekdays from 9 am to dusk, except the handgun area remains open until 8 pm on Wednesday. Weekends are open from 9 am to 5 pm.
- The trap/skeet ranges are open from 9 am to 8 pm on Wednesday and 9 am to 5 pm on the weekends.
- Indoor range, archery and fishing are open to members with a keycard access anytime.

During operational hours for the clay sections and rifle/handgun sections, there is a range between four (4) and seven (7) employees on the property. Based on the draft Shooting Range By-law, these operational hours may change.

The Site is 97.57 hectares in size and has 808 meters of frontage on Gore Road. There are two vehicular accesses from Gore Road that connect to the existing gun club on the Site. The majority of the Site has been retained in a natural state, with wooded areas, a watercourse and a wetland. There is a concentration of buildings and structures around the clay section, including an office and indoor target areas.

The Site is generally located in an agricultural area and is outside a defined settlement area. Surrounding land uses include agricultural uses and rural residential properties. The Cambridge Golf Club is located to the south of the Site, as well as a railway line.

The Site is delineated as follows in the applicable planning documents:

# County of Wellington Official Plan, 1999

- Designated as "Secondary Agricultural", "Core Greenlands" and "Greenlands" on Schedule B7 (Land Use – Puslinch)
- Paris and Galt Moraine Policy Area on Schedule C7 (Source Water Protection Puslinch)

# Township of Puslinch Zoning By-law No. 023-18

• Zoned "Agricultural Site-specific Zone (A(sp4))" and "Natural Environment" with an Environmental Protection Overlay

# **Grand River Conservation Authority**

• A portion of the Site is located within the Regulated Area and identified as "wetland", "slope valley", "regulated watercourse", and "floodplain"

## **Minor Variance Application**

The purpose of the Minor Variance Application is to provide greater clarity on the accessory structure permissions within the Puslinch Zoning By-law to permit the proposed construction of a noise wall, using sealed containers. As confirmed by GRIT Engineering, sealed containers are an accepted and effective material for a noise wall and attenuate noise levels. The sealed containers will solely be used for noise attenuation and not for storage purposes.

While the A(sp4) Zone permits accessory structures on the Site, and the proposed noise wall is clearly accessory to the permitted use, there are general provisions in Section 4.24 to regulate the use of sealed containers for storage purposes. Through discussions with Township staff, it was determined prudent to seek a variance from Section 4.24 to permit the use of sealed containers as an accessory structure for noise attenuation. Through the variance, specifications can also be included related to the overall height of the proposed accessory structure.

As such, based on the foregoing, the following variances are requested:

Notwithstanding Section 4.24 and 4.4 of the Zoning By-law, sealed containers may be used for the
purposes of accessory structures to provide noise attenuation and are exempted from the provisions
in Section 4.24.2, provided the shipping containers do not exceed a height of 8 metres.

#### **Noise Evaluation**

The Owners retained GRIT Engineering to design noise mitigation for the Trap/Sk1eet Range Area. The noise assessment utilized the criteria obtained from the Corporation of the Township of Puslinch draft Bylaw to regulate, prohibit, and otherwise control noise from shooting ranges in the Township of Puslinch (Draft Shooting Range By-Law). According to the Draft By-Law the maximum permitted sound level is 70



dBAI Logarithmic Mean Impulse Sound Level (LLM). The proposed noise wall, utilizing sealed containers, was determined to be an effective form to attenuate noise in the area of the Trap/Skit Range to meet the Draft By-law.

As illustrated on the attached sketch, the sealed container wall is 146.4 metres in length in a north-south direction and 36.6 metres in length in a northwest and southwest direction. The wall will have an overall height of 5.18 metres from finished grade.

GRIT has also prepared a visual assessment of the proposed noise wall from surrounding residential properties. The visual assessment includes the elevation of existing structures, the height of the treed areas, and the sight line between the proposed noise wall and the residential use to the southwest. The adjacent residential property to the southwest is at an approximate grade elevation of 295.9 metres ASL and has a wide tree stand located on the boundary between the Site and the residential property. The estimated height of the boundary trees is 313.8 metres ASL. In addition to the buffering with a large tree stand, the proposed noise wall is approximately 200 metres (650 feet) from the residential property. There is also a raised grade on the Site and a building between the noise wall and the residential property. Based on the foregoing, it is anticipated that the noise wall will have very limited, if any, visibility from the adjacent residential property.

# Land Use Planning Framework

The following section outlines the applicable land use policy framework for the proposed Minor Variance Application.

#### Provincial Planning Statement, 2024

The Provincial Planning Statement ("PPS"), 2024, is a province-wide policy document that sets the foundation for regulating development and land use. The PPS is issued under Section 3 of the Planning Act. The PPS "sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians." The document is to be read in its entirety, and all relevant policies must be considered. Municipal official plans are the most important vehicle for implementing the PPS and achieving comprehensive, integrated, and long-term planning.

The Site forms part of the "Rural Area" and is defined as Rural Lands. Section 2.5.1 of the PPS states that rural areas shall be supported by, amongst others:

- a) building upon rural character, and leveraging rural amenities and assets;
- e) promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;



- f) providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;
- g) conserving biodiversity and considering the ecological benefits provided by nature; and
- h) providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.

Permitted uses on rural lands include resource-based recreational uses and other rural land uses (Section 2.6.1).

Policies related to the natural environment are provided in Section 4.1 of the PPS. Natural features and areas shall be protected for the long term. Development and site alteration are not permitted in significant woodlands, significant wetlands, and significant areas of natural and scientific interest, unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

Section 5.2 of the PPS addresses floodplains and flooding risks, stating that development and site alteration shall not be permitted in areas that would be rendered inaccessible to people and vehicles during times of flooding hazards, erosion hazards and/or dynamic beach hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard.

In our professional opinion, the Minor Variance is consistent with the PPS, supporting a long-established recreational use, while ensuring matters related to land use compatibility with surrounding sensitive land uses are addressed. The proposed noise wall is located outside of the defined natural heritage features and areas identified by the GRCA as floodplain.

# County of Wellington Official Plan, 1999

The Site is designated as "Secondary Agricultural", "Core Greenlands" and "Greenlands" on Schedule B7 (Land Use – Puslinch) to the County of Wellington Official Plan ("OP"). Schedule C7 also identifies the Site as forming part of the "Paris and Galt Moraine Policy Area".

The OP is based on the following concepts: sustainable development, land stewardship, healthy communities, and complete communities. Within the concept of healthy communities, the OP promote social, physical and mental well-being as well as accessible recreational opportunities for people of all ages, abilities and incomes. Furthermore, the reduction of stress of daily living is a goal of the OP.

The area in which the new structure is proposed on the Site is designated as "Greenlands"; as such, this Planning Justification Letter focuses on these policies. The Greenlands System are identified as providing visual pleasure, tranquility, recreation and renewal to human health and wellbeing.

Section 5.5 of the OP states that "Greenlands":



Other significant natural heritage features, including habitat, areas of natural and scientific interest, streams and valleylands, woodlands, environmentally sensitive areas, ponds, lakes and reservoirs and natural links, are also intended to be afforded protection from development or site alteration which would have negative impacts.

These areas are often found within Core Greenlands. Where they are outside Core Greenlands they are identified as Greenlands.

Within the "Greenlands" designated, permitted uses and activities may include agriculture, existing uses, and passive recreation. Based on the foregoing, the existing use of the Site for the purposes of a gun club with associated outdoor passive recreational uses is permitted. The proposed noise wall is an accessory structure to a permitted use.

Section 4.9.7 of the OP sets out the policies related to the Paris and Galt Moraine Policy Area, which has unique landforms. The policies are designed to protect moraine processes and features, and promote stewardship activities on the moraines that maintain, restore, or enhance groundwater and surface water resources. Section 4.9.7.2 b) permits small-scale development that does not rely on significant site alterations. Best practices for alterations will be required to reduce or eliminate cut and fill activities that would fill in land surface depressions. The proposed noise wall is to be constructed on a portion of the Site that is already altered and is comprised of gravel and manicured lawn.

#### Township of Puslinch Zoning By-law No. 023-18

The Township of Puslinch Zoning By-law No. 023-18 ("By-law") zones the Site as "Agricultural Site-specific Zone (A(sp4))" and "Natural Environment" with an Environmental Protection Overlay. The portion of the Site proposed to accommodate the noise wall is zoned A(sp4) with the Environmental Protection Overlay.

Township staff confirmed on June 11, 2025 that the "existing single detached dwelling, shooting range, hall for meetings and banquets, Sportsmen's private club, and up to 20 seasonal tourist trailers are permitted under the A(sp4) Zone."

The proposed noise wall is an accessory structure to the permitted use on the Site. The By-law defines an "accessory structure" as a detached building or structure, the use of which is naturally and normally incidental to, subordinate to, or exclusively devoted to a principal use or building on the same lot.

Accessory structures are related through Section 4.4 of the By-law. The following provisions apply (Section 4.4.2):

- a) No accessory building or structure shall be erected on a lot prior to the erection of the principal building on the lot.
- b) No accessory building or structure shall be used for human habitation or as a home business, unless expressly permitted by this By-law.
- c) No accessory building or structure or part thereof shall be located within:
  - a. an easement that is in favour of a public authority;



- b. a sight triangle; or
- c. One (1) metre from the principal building on the lot.

With respect to the use of shipping containers, Section 4.24 of the By-law states that they may be used as an accessory structure for storage in the A Zone, subject to the following:

- a) Shipping containers shall only be permitted on a lot with a minimum area of 0.4 hectares.
- b) A maximum of one shipping container shall be permitted per 0.4 hectares of lot area to a maximum floor area of 255 m2 of all shipping containers on any one lot.
- c) Shipping containers shall only be permitted in a rear yard and shall not be permitted in a required parking area.
- d) Shipping containers shall only be permitted where an outdoor storage area or outdoor storage use is also permitted.
- e) Shipping containers in an Industrial Zone shall be screened from the street frontage and buildings on abutting lots.
- f) Shipping containers shall not be permitted any closer than 10 metres to a lot containing residential uses or zoned for residential use.
- g) Shipping containers shall not be used for human habitation.
- h) The maximum size of a shipping container permitted shall be 51 m2
- i) Shipping containers shall be subject to the maximum lot coverage requirements for accessory buildings, as per Table 4.1 of this By-law.
- j) On any lot zoned Agricultural, a minimum of 75 percent of all shipping containers, based on floor area, shall be located within 50 metres of an agricultural building or structure.

The Environmental Protection Overlay corresponds to the Greenlands designation in the OP and indicates that a physical feature is present that may require further review or permissions prior to development approvals or the issuance of a building permit.

In our professional opinion, the construction of an accessory structure is permitted on the Site, and the noise wall is supportive of, and accessory to, the existing recreational use. The Minor Variance seeks to provide greater clarity on the use of shipping containers as an accessory structure and to ensure that they are not used for storage purposes.

Based on the foregoing, the Minor Variance is proposed as follows:

Notwithstanding Section 4.24 and 4.4 of the Zoning By-law, shipping containers may be used for the purposes of accessory structures to provide noise attenuation and are exempted from the provisions in Section 4.24.2, provided the shipping containers do not exceed a height of 8 metres.

#### **Grand River Conservation Authority**

A portion of the Site is located within the Regulated Area and identified as "wetland", "slope valley", "regulated watercourse", and "floodplain". The area proposed for the accessory structure is located outside



the Regulated Area of the GRCA and therefore requires no further assessment related to the conservation authority.

#### Four (4) Tests of Minor Variance

Per Section 45(1) of the Planning Act, R.S.O. 1990, c. P.13, there are four (4) tests to be evaluated when considering a Minor Variance Application. The following section outlines the four (4) tests and provides an analysis in relation to the variances being sought by the Owner.

# 1. Is the application minor?

It is our professional opinion that the requested variance is minor in nature. As noted, the Zoning Bylaw permits accessory uses on the Site, and the proposed noise wall is clearly accessory to the permitted use. The Minor Variance does not alter the range of permitted uses on the Site, solely the material and form of the proposed accessory structure (noise wall).

The proposed wording for the variance ensures that a new structure cannot be used for storage purposes and provides for clear parameters on overall height.

The Noise Opinion Letter and associated visual assessment have confirmed that the proposed noise wall will not be visible from the surrounding residential properties, as well as the municipal road (Gore Road).

The Owner will submit a Site Plan Application and Building Permit Application to address matters such as grading, stormwater management, and structural integrity.

2. Is the application desirable for the appropriate development of the lands in question?

It is our professional opinion that the application facilitates the desired and appropriate development of the Site by providing for noise attenuation, thereby bringing the Site into compliance with the draft Township of Puslinch's Shooting Range By-law. The proposed noise wall will provide for a net improvement to the surrounding land uses.

The noise wall will not be visible from surrounding properties, and the required Site Plan Application will ensure that there are no negative impacts related to grading and drainage.

3. Does the application conform to the general intent of the Zoning Bylaw?

In our professional opinion, the Minor Variance meets the general intent of the Zoning By-law. The existing use is permitted, in addition to structures accessory to the permitted use. The variance is scoped to permit the accessory structure to be constructed of shipping containers, which has not yet been contemplated in the By-law.



In our opinion, there is no expressed prohibition on using shipping containers for the accessory structure, and the variance provides greater clarity on its permission, intent of use and height.

4. Does the application conform to the general intent of the Official Plan?

In our professional opinion, the Minor Variance conforms to the general intent of the Official Plan, which promotes recreation opportunities in the rural areas for Puslinch residents. The proposed noise wall will provide for the continued use of the Site for recreational purposes, while providing for noise attenuation to surrounding residential properties.

The proposed structure is located outside the Regulated Area of the GRCA and is located on a developed portion of the Site. The structure has a greater physical separation to existing natural features than existing development on the Site.

# **Summary**

In support of the Applications, please find attached the following documents:

- The completed and executed Minor Variance Form (CloudPermit);
- The Noise Opinion Letter, prepared by GRIT Engineering and dated September 12<sup>th</sup>, 2025; and,
- Noise Wall Elevation and Site Line Analysis, prepared by GRIT Engineering.

We trust the submission can be accepted and circulated for review. If you have any questions or comments, please don't hesitate to let us know, and we will be happy to discuss them further.

Kind regards,

Caroline Baker, MCIP, RPP Principal

c.c. Owners



