



THE CORPORATION OF THE TOWNSHIP OF PUSLINCH
NOVEMBER 20, 2025 PUBLIC INFORMATION MEETING
VIRTUAL MEETING BY ELECTRONIC PARTICIPATION
& IN-PERSON AT THE PUSLINCH COMMUNITY CENTRE –
23 BROCK RD S, PUSLINCH

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AGENDA

DATE: November 20, 2025

PUBLIC INFORMATION SESSION: 7:00 P.M.

Order of Business:

- 1. Call the Meeting to Order**
- 2. Roll Call**
- 3. Disclosure of Conflict of Interest**
- 4. Purpose of Public Meeting**
- 5. Reports/Applications**

5.1 Zoning By-law Application D14-DAA (Daaz) – property location known as 7456

McLean Rd West/197 Brock Rd S, Township of Puslinch

- 5.1.1 Application and Submissions – [Puslinch.ca/ActiveZoning](https://puslinch.ca/ActiveZoning)
- 5.1.2 Staff Public Meeting Report
- 5.1.3 Agency Comments – None
- 5.1.4 Written Public Comments – None



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23 BROCK RD S, PUSLINCH

**5.2 Zoning By-law Application D14-ONT (Ertl) – property location known as 6678
Wellington Rd 34, Township of Puslinch**

- 5.2.1 Application and Submissions – [Puslinch.ca/ActiveZoning](https://puslinch.ca/ActiveZoning)
- 5.2.2 Staff Public Meeting Report
- 5.2.3 Agency Comments – None
- 5.2.4 Written Public Comments

6. Adjournment



REPORT COR-2025-063

TO: Mayor and Members of Council

PREPARED BY: Justine Brotherston, Director of Corporate Services/Municipal Clerk

PRESENTED BY: Justine Brotherston, Director of Corporate Services/Municipal Clerk

MEETING DATE: November 19, 2025

SUBJECT: Zoning By-law Amendment Application
7456 McLean Road W & 197 Brock Road S
Public Information Meeting Report
File: D14/DAA

Purpose

The purpose of this report is to advise Council of steps taken to date with respect to the Zoning By-law Amendment Application, and to provide Council with the Township's Planning Consultants Report outlining the purpose of the proposed Zoning By-law Amendment.

Background

Council at its meeting on September 17, 2025 at the recommendation of staff, deemed the Zoning By-law Amendment Application for the properties municipally known as 7456 McLean Road West & 197 Brock Road South to be complete and directed staff to complete the notice in accordance with Section 3 and Section 5 O. Reg 545/06 of the *Planning Act, 1990*, as amended.

The following steps have been completed to date:

- Circulate the statutory notice to properties within a 120 metre buffer, in addition to all required agencies on October September 26, 2025
- Statutory notice circulated in Wellington Advertiser on October 2nd, 2025
- Application presented to Planning and Development Advisory Committee for comments November 12, 2025
- Public Information Meeting November 20, 2025

The next step in the process is to provide Council with a Planning Recommendation report at a future Council meeting. Staff do not have an anticipated date for this report at this time.

Financial Implications

As outlined throughout the report.

Applicable Legislation and Requirements

County of Wellington Official Plan
Township of Puslinch Zoning By-law 2018-023
Planning Act, R.S.O. 1990, as amended

Attachments

Schedule "A" – NPG Planning Solutions D14-DAA Public Information Meeting Report

Respectfully submitted,

Reviewed by:

Justine Brotherston
**Director of Corporate Services/
Municipal Clerk**

Courtenay Hoytfox,
CAO



Planning Report for the Township of Puslinch
Prepared by NPG Planning Solutions Inc.

To: Courtenay Hoytfox, CAO
Township of Puslinch

From: Jeremy Tran,
Manager, Urban Design and Development Planning
NPG Planning Solutions Inc.

Subject: Public Meeting – Daaz Inc.
Zoning By-law Amendment Application D14-DAA
CON 7 REAR PT LOT 25 RP;61R4472 PART 2
7456 McLean Road West & 197 Brock Road South, Puslinch

Meeting Date: November 20, 2025

Attachments: 1 - Aerial Map of Subject Lands
2 - Draft Site Plan provided by applicant
3 - Draft Zoning By-law provided by Applicant

SUMMARY

The Township of Puslinch received a Zoning By-law Amendment Application (the “Application”) for lands municipally known as 7456 McLean Road West and 197 Brock Road South (the “Subject Lands”). The purpose of the Application for Zoning By-law Amendment is to rezone the Subject Lands to facilitate a development consisting of a gas bar for cars, a gas bar for trucks, a truck weighing station and associated truck staging area, a convenience store, and a drive through restaurant.

A Public Meeting is scheduled for November 20, 2025. This report provides a preliminary overview of the proposal, highlights some of the applicable planning policies to be considered, comments received to date and explains the next steps in the planning review process.

It is recommended that this Public Meeting Report regarding the proposed Zoning By-law Amendment Application D14-DAA be received for information.

INTRODUCTION

The Subject Lands are currently vacant and have frontages along Brock Road South (also known as County Road 46) and along McLean Road West; and located south of Aberfoyle. The lands are legally described as Concession 7 Part of Lot 25; Part 2 Plan 61R4472, and Parts 1 & 2 Plan 61R7239, Township of Puslinch, County of Wellington. The Subject Lands are approximately 1.62 hectares in size and generally rectangular in shape.

There are no environmental features on or adjacent to the Subject Lands. The Subject Lands are also outside of the Grand River Conservation Authority (GRCA) regulation limit.

Surrounding land uses consist primarily of industrial uses. Directly north and west of the Subject Lands are lands that are currently vacant but are zoned industrial. There are industrial uses to the east, and commercial uses to the south. In addition, there are aggregate operations further west and north of the Subject Lands. An aerial of the property is included as **Attachment 1**.

PURPOSE

The purpose of the Application for Zoning By-law Amendment (“the Application”) is to amend the Township of Puslinch Comprehensive Zoning By-law No. 023-18 (the “Puslinch Zoning By-law”) to permit a personal vehicle gas bar, a truck gas bar, a truck weighing station and associated truck staging area, a convenience store, and a drive through restaurant.

The Conceptual Site Plan is included as Attachment 2, illustrating the proposed uses in addition to two (2) vehicular accesses. In details, one full-movement access is proposed from McLean Road West, and one restricted right-in, right-out access is proposed from Brock Road.

The Application would rezone the lands from Industrial Site-Specific (IND(sp54)) and Industrial zone with Holding provisions 5 (IND(h-5)) to a Highway Commercial Site-Specific Zone (HC(spXX)) to permit the proposed uses. Details of the proposed Zoning By-law Amendment are included in subsequent sections of this report. The draft Zoning By-law Amendment proposed by the Applicant is included as Attachment 3.

A concurrent Site Plan Approval application was also submitted to the Township of Puslinch.

REPORTS AND STUDIES SUBMITTED

In support of the Application, the following items were submitted:

- Hydrogeological Assessment Report prepared by C.F Crozier & Associates Inc., dated July 2025;
- Transportation Impact Study prepared by C.F Crozier & Associates Inc., dated August 2025;
- Functional Servicing & Stormwater Management Report prepared by C.F Crozier & Associates Inc., dated August 2025;
- Building Elevations prepared by Richard Ziegler Architect Inc., dated August 5, 2025;
- Civil Engineering Drawing Package prepared by C.F Crozier & Associates Inc., dated August 1, 2025;
- Site Plan prepared by Richard Ziegler Architect Inc., dated August 5, 2025;
- Draft Zoning By-law;
- Gas Bar Elevations prepared by Richard Ziegler Architect Inc., dated August 5, 2025;
- Floor Plans prepared by Richard Ziegler Architect Inc., dated August 5, 2025;
- Planning Justification Report prepared by Siv-ik Planning and Design Inc. , dated September 20, 2023;
- Roof Plans prepared by Richard Ziegler Architect Inc., dated August 5, 2025;
- Drinking Water Source Protection Screening Form dated October 3, 2023;
- Tree Inventory and Preservation Plan prepared Kuntz Forestry Consulting Inc.; dated July 25, 2025;
- Woodland Designation Assessment prepared Kuntz Forestry Consulting Inc.; dated July 25, 2025;
- Topographic Survey prepared by Tarasick McMillan Kubicki Limited, dated November 3, 2022;
- Tree Inventory and Preservation Plan prepared by Kuntz Forestry Consulting Inc., dated July 25, 2025;
- Zoning By-law Amendment Application; and

- Property Transfer.

POLICY AND LEGISLATIVE FRAMEWORK

Planning Act, R.S.O. 1990, c. P.13

Section 2 of the *Planning Act* identifies matters of Provincial interest that Council shall have regard to in carrying out its responsibilities under the *Planning Act*. Subsection 3(5) of the *Planning Act* requires that decisions of Council shall be consistent with provincial policy statements and shall conform with provincial plans that are in effect. Section 34 of the *Planning Act* permits councils of local municipalities to pass and/or amend Zoning By-laws. As per Section 24(1) of the *Planning Act*, By-laws passed by Council shall conform to official plans that are in effect.

Provincial and County Policies

The Subject Lands are within an Employment Area as per the Provincial Planning Statement, 2024 (the “PPS”). The Subject Lands are designated Rural Employment Area as per Schedule B7: Puslinch (Land Use) of the Wellington County Official Plan (County OP).

The following policies apply:

Provincial Planning Statement (2024)

2.6 Rural Lands in Municipalities

1. *On rural lands located in municipalities, permitted uses are:*

g) other rural land uses.

2. *Development that can be sustained by rural service levels should be promoted.*

2.8 Employment

2.8.1 Supporting a Modern Economy

1. *Planning authorities shall promote economic development and competitiveness by:*

a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;

b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which

support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;

2.8.2 Employment Area

2. Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.

3. Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:

a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;

b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;

c) prohibiting retail and office uses that are not associated with the primary employment use.

3.6 Sewage, Water and Stormwater

1. Planning for sewage and water services shall:

b) ensure that these services are provided in a manner that:

1. can be sustained by the water resources upon which such services rely;

3. protects human health and safety, and the natural environment, including the quality and quantity of water.

4. Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.

4.2 Water

1. Planning authorities shall protect, improve or restore the quality and quantity of water by:

b) minimize potential negative impacts, including cross-jurisdictional and cross-watershed impacts;

e) implementing necessary restrictions on development and site alteration to:

2. protect, improve or restore vulnerable surface and ground water, and their ecological functions.

8: Definitions

Employment Area: means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above. Negative Impacts: means

- a) *in regard to policy 3.6.4 and 3.6.5, potential risks to human health and safety and degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development. Negative impacts should be assessed through environmental studies including hydrogeological or water quality impact assessments, in accordance with provincial standards;*
- d) *in regards to policy 4.2, degradation to the quality and quantity of water, sensitive surface water features and sensitive ground water features, and their related hydrologic functions, due to single, multiple or successive development or site alteration activities;*

County of Wellington Official Plan (Last Updated July 2024)

3.4 Servicing Growth

...Where full municipal services are not available or cannot be provided, municipalities may choose to use private communal sewage services and private communal water services. The use of individual on-site systems will be limited to the low intensity uses in the rural system and unserviced settlement areas.

4.9 Water Resources

4.9.3 Groundwater

It is the intent of this Plan that all development and site alteration shall be subject to the following policies to ensure water quality and quantity are not negatively

affected. Specifically, it is the County's intent that the development of public and private uses will not:

- negatively impact groundwater recharge or discharge*
- impair groundwater or surface water quality*
- negatively impact municipal groundwater supply.*

4.9.4 Policy Direction

Wellington County commits to pursuing the following directions relating to water resources:

b) protect surface and groundwater quality and quantity through the use of regulatory and voluntary means of prohibiting, restricting or influencing land uses and activities within vulnerable areas, communal well policy areas, and underlying vulnerable aquifers;

c) ensure that development meets provincial water quality objectives;

d) ensure levels of wastewater treatment that are appropriate for the size, location and scale of development anticipated;

4.9.7 Paris and Galt Moraine Policy Area

4.9.7.2 Policy Direction

On lands in the Paris and Galt Moraines Policy Area on Schedule C that lie outside of Wellhead Protection Areas, the following shall apply:

a) Large scale development proposals including intensive recreation, mineral aggregate operations, new rural employment area designations, and urban boundary expansions will be required to demonstrate that ground and surface water functions will be maintained, and where possible, restored and enhanced;

b) Small scale developments that do not rely on significant site alterations will not normally be required to demonstrate protection of the moraines. Where planning approvals for small scale developments are needed, best practices for alteration will be required to reduce or eliminate cut and fill activities that would fill in land surface depressions.

6.8 Rural Employment Areas

6.8.2 Permitted Uses

Dry industrial and commercial uses requiring large lots, major road access or proximity to rural resources are permitted in rural employment areas.

Such industrial uses may include manufacturing, processing, fabrication and assembly of raw materials or repair, servicing, distribution and storage of materials. Accessory uses including the retail sale of products produced on-site may be allowed.

Such commercial uses will be service focused with limited accessory retail and may include business or professional offices, farm machinery sales, farm supplies, farm produce sales, small scale motels or inns, small scale restaurants and automobile sales and services. Retail commercial uses and service commercial uses normally found in primary and secondary urban centres are not allowed.

9.8 Puslinch Local Policies

9.8.1 Wellington Rd 46

Specific development policies have been established for Wellington Rd 46 to ensure that proposed development will not interfere with the safe and efficient operation of this transportation corridor. The following policies are to be considered:

a) For every development where direct access to Wellington Rd 46 is proposed, identify the following:

- *Posted speed limit;*
- *Clear sight distance along the roadway in both directions from the mouth of the access;*
- *Approach grades on access driveway;*
- *Traffic controls;*
- *Existing width of county road right-of-way adjacent to the site;*
- *Width of paved roadway and shoulders;*
- *Turning or stacking lanes on roadway;*
- *Width of access driveway and radii of corners;*
- *Distance between proposed driveway and existing driveways on adjacent sites;*
- *Project trip ends for average day and peak hours on roadway.*

- b) *For every industrial and commercial development project which generates more than 50 additional peak direction trips to or from the site during the roadway's peak hour, a complete traffic impact study is required to be submitted to the County Engineer;*
- c) *Where a site has frontage and access to a local township road or Wellington Rd 34, new commercial or industrial access to Wellington Rd 46 is not permitted;*
- h) *Obtain evidence that approval from the County of Wellington is available with regard to access driveway location and design, improvements to County Road, including turning lanes, traffic controls, stacking lanes.*

9.8.3 Puslinch Industrial Policy

a) *Areas designated Rural Employment in Puslinch are permitted to have the following additional uses:*

- *complementary commercial uses such as automotive uses, restaurants, motels and limited retail*
- *offices, including a head office and/or research centre*

9.8.6 Policy Areas

PA7-1 Puslinch Economic Development Area

The land identified as PA7-1 on Schedule B7 is known as the Puslinch Economic Development Area. This is an area intended to service the Township by providing locations for economic activity and employment opportunities. This area is the predominant location for business and industry in the Township, but does not preclude the establishment of small-scale activities outside of concentrations elsewhere in the Township.

11.2.6 Rural System Servicing

The following water and sewage policies apply in the rural system outside of secondary urban centres and hamlets:

- a) *development in the rural system is anticipated to be on individual on-site systems where soil conditions are suitable over the long term;*

13.3 Zoning By-laws

Where a land use designation in this Plan authorizes a range of uses which may be allowed, the local zoning by-law may allow all or some of those uses based on

local needs and circumstances. The by-law also may establish appropriate regulations related to those uses.

Zoning By-law 023-18

The Subject Lands consist of lands municipally known as 7456 McLean Road West and 197 Brock Avenue. The property known as 7456 McLean Road West is zoned Industrial Site-Specific (IND(sp54)) while the property known as 197 Brock Avenue is zoned Industrial Zone with Holding provision 5 (IND(h5)). The proposed gas bars, retail store and restaurant uses are not currently permitted on the Subject Lands under the Puslinch Zoning By-law.

The entirety of the Subject Lands are within the Industrial Design Overlay as per Map A-4 of the Puslinch Zoning By-law. The Industrial Design Zone Overlay provides the following relevant provision:

13.5 a. All uses permitted in the IND zone shall be permitted provided they are within a wholly enclosed building and with no outdoor storage areas...

The proposed Zoning By-law Amendment included as Attachment 3 would rezone the Subject Lands to a Highway Commercial Site-Specific Zone (HC(spXX)).

The following table provides an overview of the site-specific provisions sought by the Applicant:

Table 1: Proposed Highway Commercial Site-Specific Zone (HC(spXX))

Zone Category	Permitted Uses	Site Specific Special Provision
Highway Commercial Site-Specific (HC(spXX))	All uses permitted in the Highway Commercial Zone including gas bar, retail store and restaurant	Minimum Landscape Open Space : 20% (Current requirement is 25%) Restaurant Parking Space Requirement: 1 per 20 m ² including outdoor patio area (Current requirement is 1 per 10 m ² including outdoor patio area)

REVIEW COMMENTS

Township Comments:

- Planning (NPG Planning Solutions) – There are outstanding technical comments related to the justification of the requested reduced parking rate, and the list of

permitted uses that are contemplated on the Subject Lands. The Applicant has also been requested to discuss the proposal's consistency with the Provincial Planning Statement (2024) in an updated Planning Justification Report.

- Wellington Source Water Protection - No outstanding concerns. Additional documentation/reports have been identified to be provided during Site Plan process.
- Engineering (GEI Consultants) – The outstanding comments include revisions to the Functional Servicing and Stormwater Management Report with regard to storm sewer design, regional storms, time to peak, curve numbers, jellyfish units and maintenance of stormwater management infrastructure. Other comments can be addressed at the Site Plan stage.
- Ecology (Dougan Ecology) – The Site Plan should be revised to minimize impacts to the woodland and to meet the requirements and conditions of the County of Wellington's Woodland Conservation By-law 5115-09. According to the Tree Inventory and Preservation Plan, the proposal would remove 1.12 hectares of woodland while a permit issued under the said by-law would permit up to 0.5 hectares of woodland removal only.
- Hydrogeology (Harden Environmental) – The proposed high volume of sewage, small lot size, high water table and high degree of treatment are technical issues that need to be addressed in regard to the sewage treatment system. An Environmental Compliance Approval (ECA) will be required to permit the proposed development. In addition, the proposed development is recommended to adhere to the draft wellhead protection area (WHPA)-Q for quantity policies. Additional technical comments can be deferred to Site Plan Stage.
- Transportation (Salvini Consulting Inc.) – There are outstanding technical comments that should be addressed as part of the Zoning By-law Amendment Application. These include matters such as additional information to confirm trip generation forecasts, updates to the 95th percentile queues, additional information on the proposed truck scale, further information to support the queuing space provided for the drive-through facility, and conducting proxy surveys of comparable sites to support the reduced parking provision requested by the applicant.
- Planning and Development Advisory Committee – the application is scheduled to be considered at PDAC on November 12. PDAC's comments will be provided to Council either in an Addendum to this report or in a future report for this proposal
- Building – No comments.
- Fire and Rescue Services – No comments.

- Public Works, Parks and Facilities – No comments.
- By-law enforcement – No comments.

County Comments:

- Planning – No outstanding concerns.
- County Roads – The extension of the raised center median on Brock Road (Wellington Road 46) will be required beyond the shown proposed access location on Brock Road to permit its installation. Other key issues to be addressed as part of the Zoning By-law Amendment Application include further clarification required to verify the anticipated trip generation and further analysis required for the drive-through stacking design to justify that sufficient stacking spaces are provided.

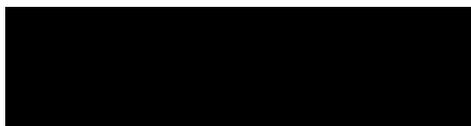
Agency Comments:

- MTO – No comments provided.
- GRCA – Not within GRCA’s regulation limit. No comments provided.

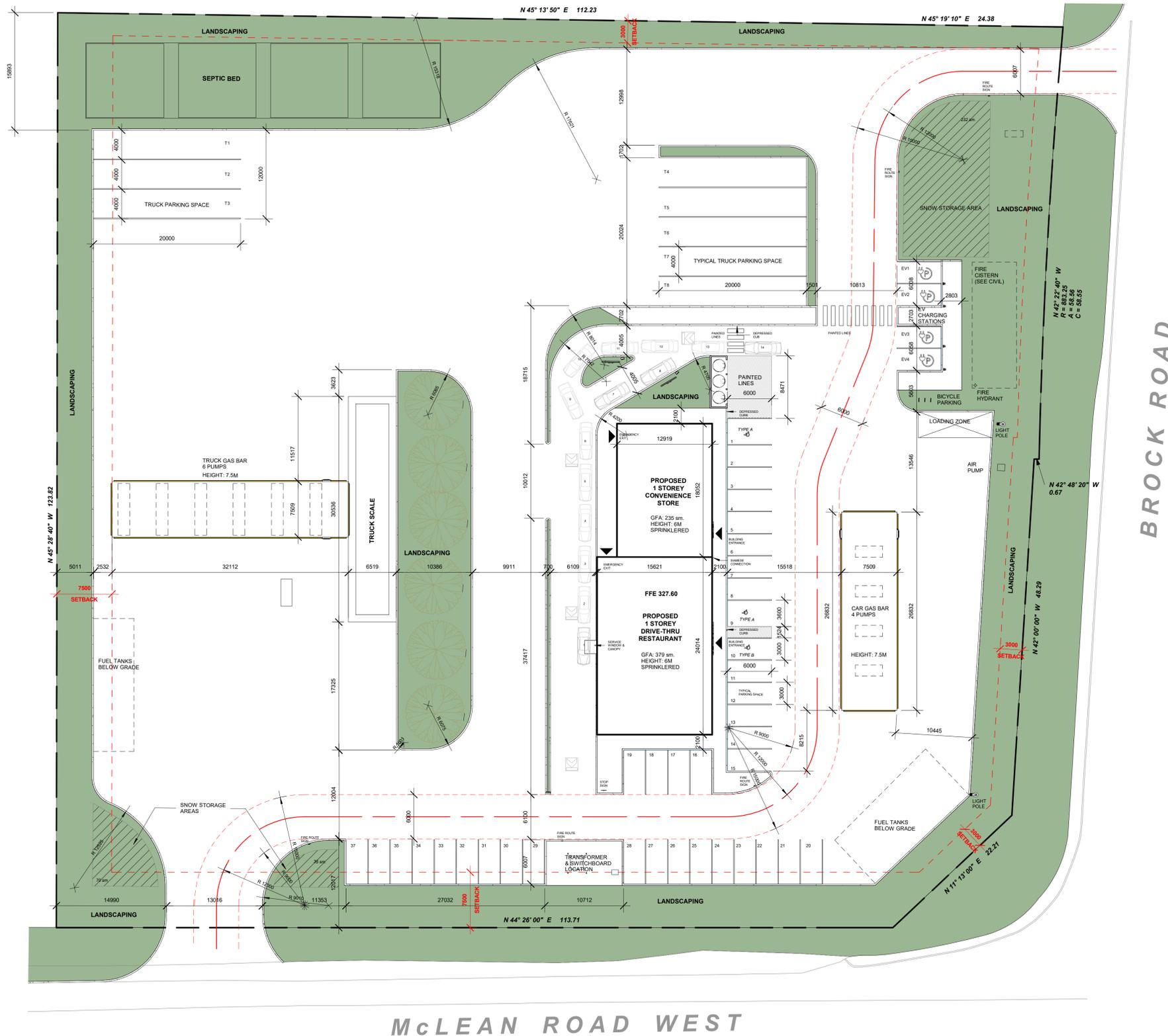
NEXT STEPS

- Our Recommendation Report is anticipated to be prepared for a future Council Meeting.

Respectfully Submitted,



Jeremy Tran, RPP, MCIP
Manager, Urban Design & Development Planning, Toronto
NPG Planning Solutions Inc.



PROJECT STATISTICS

HC ZONE REGULATIONS	REQUIRED	PROPOSED
PERMITTED USES	TABLE 8.1 ZONING BYLAW	GAS BAR(S), CONVENIENCE STORE AND RESTAURANT
LOT AREA (MIN.)	0.4 HA	1.62 H
LOT FRONTAGE (MIN.)	20 M	101 M
FRONT YARD (MIN.)	3 M	3 M
INTERIOR SIDE YARD (MIN.)	3 M	3 M
EXTERIOR SIDE YARD (MIN.)	7.5 M	7.5 M
REAR YARD (MIN.)	3 M	3 M
RESTAURANT AREA		379 sm.
CONVENIENCE STORE		235 sm.
GAS BAR CANOPY (CARS)		201 sm.
GAS BAR CANOPY (TRUCKS)		241 sm.
TOTAL BUILDING/STRUCTURE AREA		1,056 sm.
LOT COVERAGE (MAX.)	45%	6.50%
LANDSCAPED OPEN SPACE (MIN.)	25%	24%

PARKING REQUIRED		
GAS BAR - CARS	(1 PER PUMP) = 4	SEE BELOW
GAS BAR - TRUCKS	(1 PER PUMP) = 6	8
CONVENIENCE STORE	(1 PER 20 sm.) = 12	SEE BELOW
RESTAURANT	(1 PER 10 sm.) = 38	SEE BELOW
TOTAL	60	49

VEHICLE PARKING SCHEDULE

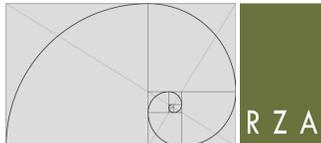
Per Table 5.3 of Zoning Bylaw

TYPE OF PARKING SPACE	PROVIDED PARKING SPACE
ACCESSIBLE PARKING - TYPE A	2
ACCESSIBLE PARKING - TYPE B	1
TRUCK PARKING	8
TYPICAL PARKING SPACE	38
TOTAL	49

BICYCLE PARKING SCHEDULE

Per Table 5.6 of Zoning Bylaw

REQUIRED	PROVIDED
2 PER 1,000 sm. = 2	2



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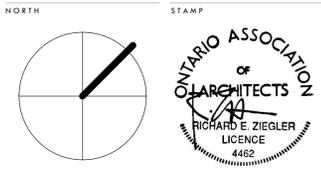


SITE CONTEXT

ISSUED FOR PLANNING APPROVALS 2025.08.05

NO. ISSUANCE DATE

THE GENERAL CONTRACTOR SHALL CHECK AND VERIFY ALL DIMENSIONS AND REPORT ALL ERRORS AND OMISSIONS TO THE ARCHITECT. DO NOT SCALE THE DRAWINGS. DO NOT USE THIS DRAWING FOR CONSTRUCTION UNLESS SIGNED AND SEALED BY THE ARCHITECT.



PROPOSED COMMERCIAL DEVELOPMENT

7456 McLEAN ROAD WEST & 197 BROCK ROAD SOUTH
 TOWN OF PUSLINC

SITE PLAN

SCALE	PROJECT NUMBER
1:300	202436
DATE 2025-08-05 9:52:48 AM	
DRAWN REZ	
CHECKED REZ	
SHEET	REVISION

A101

FILE NAME: Y:\2024\Project\202436 - 7456 McLean Road_PlanSet\2D Design and Construction Document\Plan\Site\7456 McLean Road 20241110.dwg
 PLOT DATE: 2025-08-05 9:52:48 AM

ZONING BY-LAW AMENDMENT to By-law 023/18

for

DAAZ Inc.

7456 Mclean Road West & 197 Brock Road South, Puslinch

Township Rezoning Application D14/DAZ

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER _____

**A BY-LAW TO AMEND BY-LAW NUMBER 023/18, AS AMENDED,
BEING THE ZONING BY-LAW OF THE TOWNSHIP OF PUSLINCH**

WHEREAS, the Council of the Corporation of the Township of Puslinch deem it appropriate and in the public interest to amend By-Law Number 023/18 pursuant to Sections 34 of the Planning Act, R.S.O. 1990 as amended;

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF PUSLINCH ENACTS AS FOLLOWS:

1. That Schedule "A" of By-law 023/18 is hereby amended by rezoning the lands municipally referred to as 7456 Mclean Road West and 197 Brock Road South, from a Special Provision Industrial (IND(sp54)) ZONE and Holding Industrial (IND(h5)) ZONE to a site specific **Highway Commercial (HC(sp_)) ZONE**, as shown on schedule "A" of this By-law.
2. That Section 14 Site-Specific Special Provisions is amended by adding the following site specific provision:

No.	Zone Designation	Additional Permitted Uses	Prohibited Uses	Site Specific Special Provision
	HC	N/A	N/A	LANDSCAPED OPEN SPACE (MINIMUM): 20.0% PARKING SPACE REQUIREMENT RESTAURANT (MINIMUM): 1 per 20m ² including outdoor patio area.

3. That the subject land as shown on Schedule "A" to this By-Law shall be subject to all applicable regulations of Zoning By-Law 023/18, as amended.
4. This By-law shall become effective from the date of passage by Council and come into force in accordance with the requirements of the Planning Act, R.S.O. 1990, as amended.

READ A FIRST AND SECOND TIME THIS _____ OF _____, 20__.

MAYOR

CLERK

READ A THIRD TIME AND PASSED THIS _____ OF _____, 20__.

MAYOR

CLERK

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER _____

Schedule "A"

INSERT MAP

Highlighted area to be rezoned from **"IND(sp54) & IND(h5)" Zone** to a site specific **"HC(sp_)" Zone**

This is Schedule "A" to By-law No. _____

Passed this ____ day of _____, 20__.

MAYOR

CLERK

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

EXPLANATION OF BY-LAW NO. _____

By-law Number _____ amends the Township of Puslinch Zoning By-law 23/18 by rezoning the lands municipally referred to as 7456 Mclean Road West and 197 Brock Road South from a Special Provision Industrial (IND(sp54)) ZONE and a Holding Industrial (IND(h5)) ZONE to a Special Provision Highway Commercial (HC(sp_)) ZONE to permit a gas bar, associated retail/convenience store, and drive through restaurant.

The subject property is approximately 1.62 hectares (4.0 acres) in size and is currently vacant/undeveloped.

Within the County's Official Plan, the subject lands are designated as "Rural Employment". This designation permits such commercial uses that will be service focused, with limited accessory retails, including both small scale restaurants and automobile services.



REPORT COR-2025-064

TO: Mayor and Members of Council

PREPARED BY: Joe Nethery, MCIP, RPP - Consultant Planner

PRESENTED BY: Joe Nethery, MCIP, RPP - Consultant Planner

MEETING DATE: November 20, 2025

SUBJECT: Zoning By-law Amendment – Temporary Use By-law
6676-6678 Wellington Rd. 34, Township of Puslinch

File No.: D14-ONT

Attachments: 1 – Aerial map of subject lands
2 – Concept Plan provided by applicant
3 – Preconsultation summary
4 – Draft By-law provided by applicant

Purpose

The purpose of the Application for a Zoning By-law Amendment (“the Application”) is to apply a temporary use permission in accordance with the *Planning Act*, section 39(1), on lands municipally known as 6676-6678 Wellington Road 34. The temporary use by-law would permit a liquid soil management operation on a portion of the property for 3 years. Extensions of temporary use by-laws can be granted by Council as per the *Planning Act*, section 39(3), “council may by by-law grant further periods of not more than three years each during which the temporary use is authorized.”

Description of site

The subject property comprises of approximately 40 hectares of land (See aerial map in **Appendix #1**). The proposed temporary use would occupy approximately 2.9 hectares in the central portion of the property (see the applicant’s site plan attached as **Appendix #2**) and includes:

- A 650 sq. ft. office/maintenance building;

- 25 hydrovac truck parking spaces;
- 35 employee/visitor spaces;
- areas for soil offloading, dewatering, processing, and stockpiling;
- a lined temporary pond and drainage swale; and,
- associated on-site services (as identified by the proponent, private wells, septic leach field, and firefighting cistern).

The operation would receive liquid soil from hydrovac trucks and dewater the material on-site. The dried soil would then be sampled and managed for reuse in pit rehabilitation or transport to approved receiving sites.

Background

The proponents of this application were previously before Council under a Zoning By-law Amendment application (D14/BAD) submitted by the same operator on January 11, 2022, to permit an existing and on-going liquid soil management operation on the property. The application was considered through Staff Report ADM-2023-016 and was refused by Council on March 22, 2023. The matter was subsequently appealed to the Ontario Land Tribunal (OLT); however, prior to the scheduled hearing, the operator withdrew from the proceeding, and the case was formally closed in 2024.

In October 2024, the proponent was granted two Environmental Compliance Approvals by Ministry of the Environment, Conservation and Parks (MECP). These Environmental Compliance Approvals (ECAs) permit the operation of a liquid soil management facility at 6678 Wellington Road 34. These include ECA No. A-500-4277838045 (Waste Disposal Site) and ECA No. A-500-3223236868 (Air and Noise).

Collectively, these approvals authorize the receipt, storage, processing, and transfer of excess soil, including liquid soil, on the subject property. Among other conditions, Condition 8 of ECA No. A-500-4277838045 states:

“The issuance of, and compliance with the conditions of, this Approval does not relieve any person of any obligation to comply with any provision of any applicable statute, regulation, or other legal requirement, including municipal by-laws relating to zoning or site plan approval.”

While the ECAs regulate the environmental operation of the facility, municipal planning approval through a Zoning By-law Amendment remains required before the activity may proceed in compliance with local land use permissions.

The ECAs further establish monitoring, reporting, and contingency measures governing the site's operation, including soil and water sampling, acoustic monitoring, and environmental management protocols.

A pre-consultation meeting was held on February 27, 2025, with Township, County, and external consultants. Through this pre-consultation, Township consultants once again identified that the operation is not a permitted use under existing zoning and that relief from the Zoning By-law would be required (see the pre-consultation notes in **Appendix #3**). Technical studies identified, as necessary to support the application, included a Planning Justification Report, Environmental Impact Assessment, Traffic Operations Assessment, Design and Operations Report, Site Servicing and Stormwater Management Report, Hydrogeological Impact Assessment, Acoustic Assessment, and Source Water Protection documentation.

On July 2, 2025, the Township received a complete application for a Zoning By-law Amendment (Temporary Use By-law) from 2374868 Ontario Inc. (the "Applicant") for the lands municipally known as 6676–6678 Wellington Road 34, legally described as Part of the South Half of Lot 8, Concession 3, Township of Puslinch. The application was submitted by GSP Group Inc. on behalf of the owner and proposes to permit a liquid soil management operation on a portion of the property for a period of three years, in accordance with Section 39 of the *Planning Act*.

At its meeting on September 17, 2025, Council received Staff Report COR-2025-035, through which staff deemed the application complete in accordance with the requirements of the *Planning Act*.

The purpose of this staff report is to provide background information to facilitate the statutory public meeting with Council in accordance with the *Planning Act*.

Overview of Technical Comments

The applicant submitted the following required studies in July 2025:

- Concept Plan (Figure 1), prepared by GHD, dated May 28, 2025.
- Development Concept, prepared by GSP Group, dated June 6, 2023.

- Site Servicing Study, prepared by GHD, dated June 20, 2025.
- Environmental Compliance Approval (diesel engine and emissions), prepared by the MECP, issued October 11, 2024.
- Environmental Compliance Approval (liquid soil waste disposal), prepared by the MECP, issued October 11, 2024.
- Stormwater Management Plan, prepared by GHD, dated February 9, 2021.
- Erosion and Sediment Control Plan (C-02), prepared by GHD, dated December 13, 2021.
- Response to Comments (Valcoustics), prepared by GHD, dated June 12, 2025.
- Response to Comments (Valcoustics), prepared by GHD, dated October 30, 2023.
- Response to Comments (Dougan), prepared by GHD, dated June 11, 2025.
- Response to Comments (Dougan), prepared by GHD, dated February 20, 2024.
- Response to Comments (Harden), prepared by GHD, dated June 9, 2025.
- Response to Comments (Source Water Protection), prepared by GHD, dated June 9, 2025.
- Planning Justification Report (Temporary Use By-Law Amendment), prepared by GSP Group, dated July 2025.
- Updated Traffic Operations Assessment, prepared by GHD, dated May 28, 2025.
- Acoustic Assessment Report, prepared by GHD, dated April 3, 2024.
- Design and Operations Report (Waste Processing Facility), prepared by GHD, dated March 26, 2024.
- Environmental Impact Assessment, prepared by GHD, dated May 9, 2022.
- Emission Summary and Dispersion Modelling Report, prepared by GHD, dated December 10, 2021.
- Drinking Water Treat Disclosure Report, prepared by GHD, dated December 17, 2021.

These materials were circulated to Township departments, the County of Wellington, and external agencies for review. Technical comments were received from the Township's peer reviewers and agencies as follows:

- **Engineering (GEI Consultants):** requested an updated Stormwater Management Report and associated design drawings to address inconsistencies with the 2025 Site Servicing Study and to confirm details of the liner system and temporary pond.
- **Hydrogeology (Harden Environmental):** expressed concern that the proposed use poses risk to groundwater resources given the permeable soils and proximity to aquifers, noting that mitigation measures required by the Environmental Compliance Approval (ECA) have not yet been demonstrated on site.
- **Ecology (Dougan Associates):** requested additional information to demonstrate compliance with the County's Greenlands policies, a restoration/enhancement plan, and monitoring provisions for mitigation measures.

- **Noise (Valcoustics Canada Ltd.):** requested clarification and additional modelling to ensure the Acoustic Assessment reflects predictable worst-case operating conditions.
- **Engineering (Trace Associates):** identified that the comments in their letter issued in 2023 were not addressed and request additional information and clarification regarding the design and function of the stormwater and drainage system, including pond and swale details, grading, and consistency with the ECA approvals.
- **Source Water Protection (Wellington County):** confirmed that the property is within a Wellhead Protection Area (WHPA-D) and Issue Contributing Area (Chloride), requiring a Section 59 Notice and a Risk Management Plan for chemical handling and winter maintenance activities.
- **Land Use Planning (County of Wellington Planning Department):** noted that the proposal must be evaluated against the six criteria in Section 13.4 of the County Official Plan which includes the duration, compatibility, adequacy of services, access and parking, impact assessment, and general conformity, and that the Township's technical consultants must be satisfied that the proposal meets the Paris-Galt Moraine and Greenlands policies.
- **Land Use Planning (Nethery Planning):** noted that several key sections of the County's Official Plan were not sufficiently addressed in the applicant's Planning Justification Report and a list of questions are to be addressed in subsequent application submissions.

Applicable Legislation and Requirements

Planning Act, R.S.O. 1990, c. P.13

39 (1) The council of a local municipality may, in a by-law passed under section 34, authorize the temporary use of land, buildings or structures for any purpose set out therein that is otherwise prohibited by the by-law.

This application has been submitted under Section 39(1) of the *Planning Act*, which allows Council to authorize the temporary use of land for a period of up to three years, with the ability to grant extensions under Section 39(3). The applicant relies on this section to permit the liquid soil management operation as an interim use supporting the ongoing rehabilitation of the pit.

Aggregate Resources Act, R.S.O. 1990, c. A.8

The *Aggregate Resources Act* (ARA) governs the licensing and operation of aggregate extraction sites. The property is subject to Aggregate Licence No. 626648, issued by the Ministry of Natural Resources and Forestry (MNRF) following the division of a former shared licence with Capital Paving Inc. The applicant identifies that the proposed use would occur within the licensed area and would utilize portions of the site previously used for liquid soil handling before the 2022 MNRF policy change prohibiting such activity within aggregate sites.

Environmental Protection Act, R.S.O. 1990, c. E.19

The *Environmental Protection Act* (EPA) regulates waste management, air emissions, and noise in Ontario. As noted, there were two ECAs issued. The applicant is proposing these ECAs, as part of the operational framework for the proposed temporary use, including for on-site water management and environmental protection measures.

Provincial Planning Statement, 2024 (PPS)

On October 20, 2024, the new PPS 2024 came into effect, per section 3(5) of the Planning Act:

A decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Tribunal, in respect of the exercise of any authority that affects a planning matter,

(a) subject to a regulation made under subsection (6.1), shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision; and

(b) shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be.

Staff shall rely upon the Provincial Planning Statement (2024) regarding this application. The applicant provided analysis of the policies of the 2024 Provincial Planning Statement in section 2.2 in their PJR that they believe to be applicable to the proposal.

County of Wellington Official Plan

The County of Wellington Official Plan provides the upper-tier policy framework guiding land use within the Township of Puslinch. The subject lands are identified within the Rural System on

Schedule A7 (County Growth Structure) and are primarily designated Secondary Agricultural, with a smaller portion identified as Greenlands on Schedule B7 (Puslinch Land Use). The property also lies within the Paris-Galt Moraine Policy Area as shown on Schedule C7, and the northern portion of the site is within the Mineral Aggregate Resource Overlay on Schedule D, recognized in Appendix 2 as a Licensed Aggregate Operation.

The applicant provided in section 2.3 in their PJR the policies of the County Official Plan they believe to be applicable to the proposal, including:

- Section 4.2.3 Economic Development (Variety)
- Section 4.2.5 Economic Development (Rural Opportunities)
- Section 4.6 Impact Assessment
- Section 4.9.7 Paris Galt Moraine Policy Area (Objectives)
- Section 5.5 Greenlands (Definition)
- Section 6.5.1 Secondary Agricultural Areas (Definition)
- Section 6.5.5 Secondary Agricultural Areas (Commercial, Industrial & Institutional, Development Criteria)
- Section 6.6.3 Mineral Aggregate Areas (Existing Aggregate Operations)
- Section 6.6.4 Mineral Aggregate Areas (Permitted Uses)
- Section 11.2 Water and Sewage
- Section 11.3 Stormwater Management
- Section 13.4 Temporary Use By-law

Wellington County advised that final consideration of the application should occur once the Township's technical reviewers are satisfied that the proposal conforms to these policies and adequately addresses environmental and servicing requirements.

The Township's review team has identified additional policies in the Official Plan that may be relevant to the proposal, which are requested to be addressed in a second submission.

- Section 4.9.7 Paris Galt Moraine Policy Area
- Part 5 The Greenlands System
- Section 5.4 Core Greenlands
- Section 6.6.4(c) Mineral Aggregate Systems (Permitted Uses)
- Section 6.6.7 Mineral Aggregate Areas (Ancillary Uses)
- Section 11.4.4 Waste Management (Disposal)

The Township reserves the ability to provide additional comments and request further clarification or documentation as part of subsequent submission reviews, should new information or revised materials warrant further evaluation.

Township of Puslinch Zoning By-law 023-18

The Township of Puslinch Zoning By-law 023-18 zones the subject property Agricultural (A-13) on the southern portion and Extractive Industrial (EXI) on the northern portion. In accordance with Section 9.2 of the Zoning By-law, permitted uses within the EXI Zone include aggregate processing facilities, agricultural uses, asphalt plants, business or professional offices, conservation uses, pits, quarries, warehouses, and wayside pits or quarries.

The proposed liquid soil management operation is not a permitted use under the current zoning. As such, relief from the Zoning By-law is required to permit the use. A draft By-law was provided by the applicant (see **Appendix #4**).

Financial Implications

There are no financial implications to the Township or Council arising from the review or consideration of this application, as all costs associated with peer review and processing are to be recovered from the applicant in accordance with the Township's Fees By-law 042-2023.

Engagement Opportunities

Notification of this application shall occur in accordance with the requirements of the *Planning Act* and the County of Wellington Official Plan. In accordance with O. Reg. 545/06, Section 5, a notice of public meeting for a zoning by-law amendment must be provided at least 20 days prior to the meeting by personal service, prepaid mail, or electronic means to all property owners within 120 metres of the subject lands, prescribed agencies, and any other parties requesting notification. The notice must also be published in a newspaper of general circulation within the Township.

All public and agency comments received through this process will be collected and summarized for Council's consideration in a subsequent report.

Next Steps

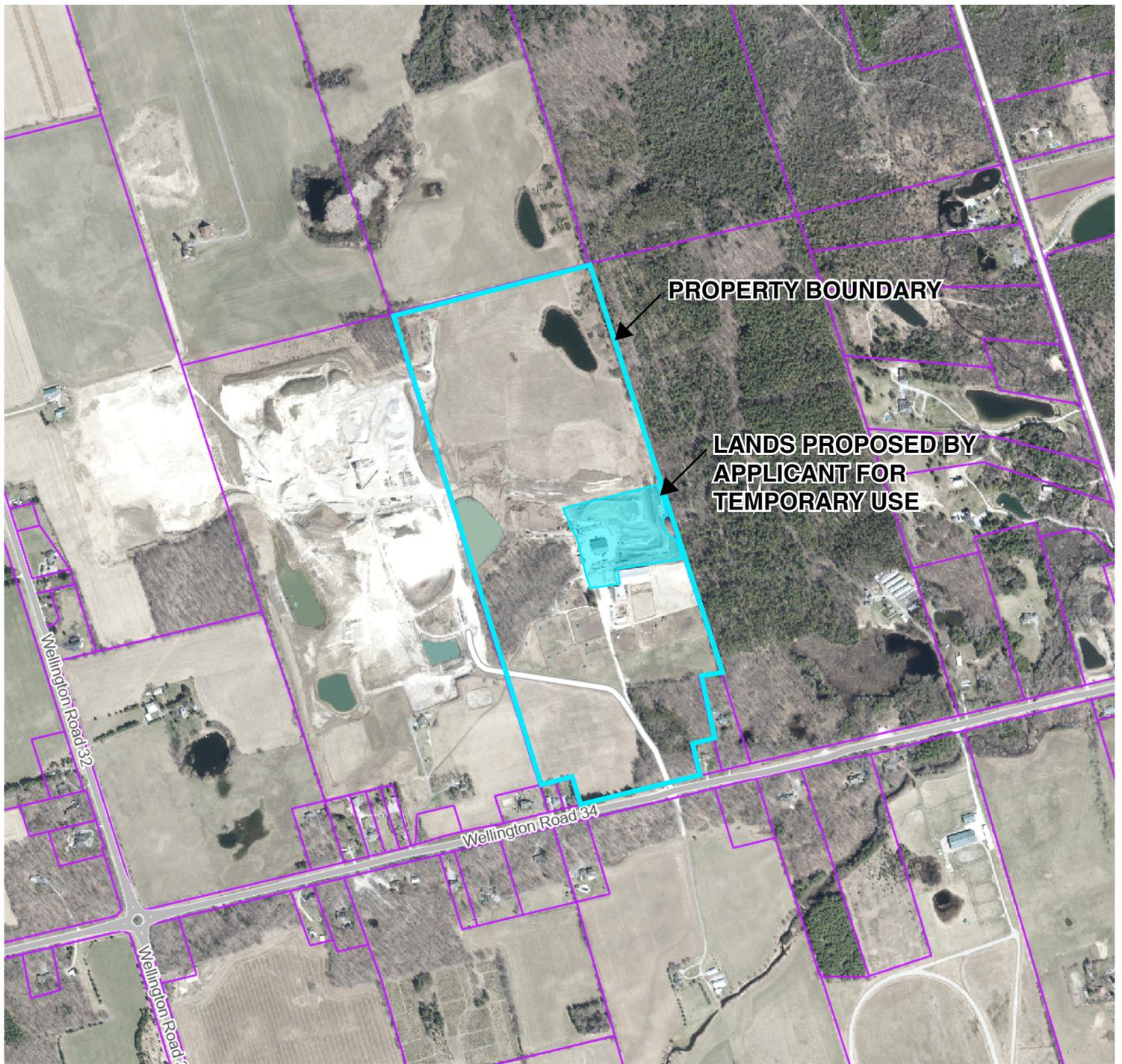
The Township review team has requested the applicant to provide a second submission addressing the outstanding technical and policy comments identified through the first round of peer review.

Once the revised materials have been received and reviewed, staff and technical reviewers will assess the information and determine if a further circulation is required or to proceed to a recommendation report in consultation with the applicant.

A subsequent report will be brought forward to Council for consideration following the completion of the review and statutory public meeting.

Respectfully submitted,

Joe Nethery, MCIP, RPP
Consultant Planner

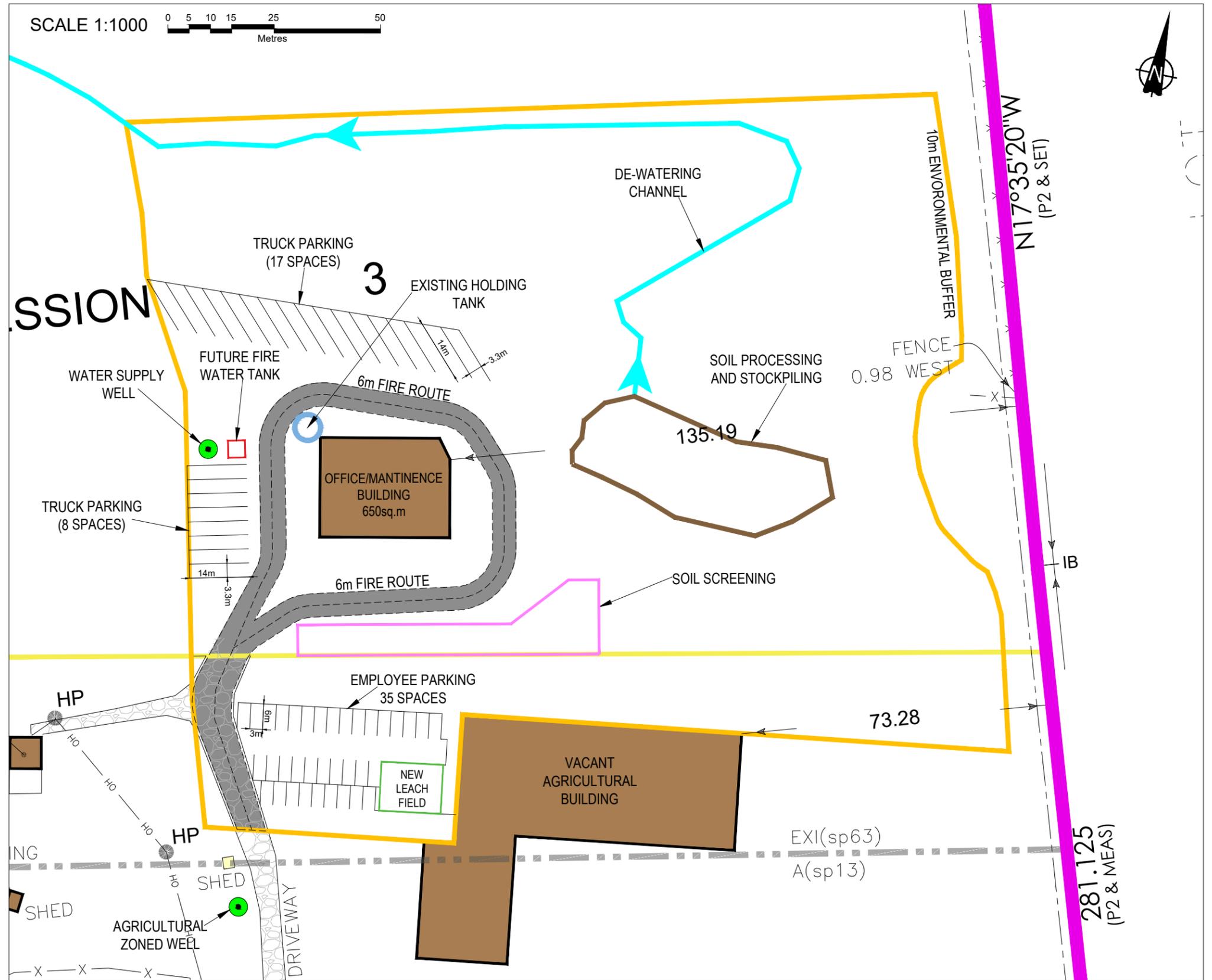
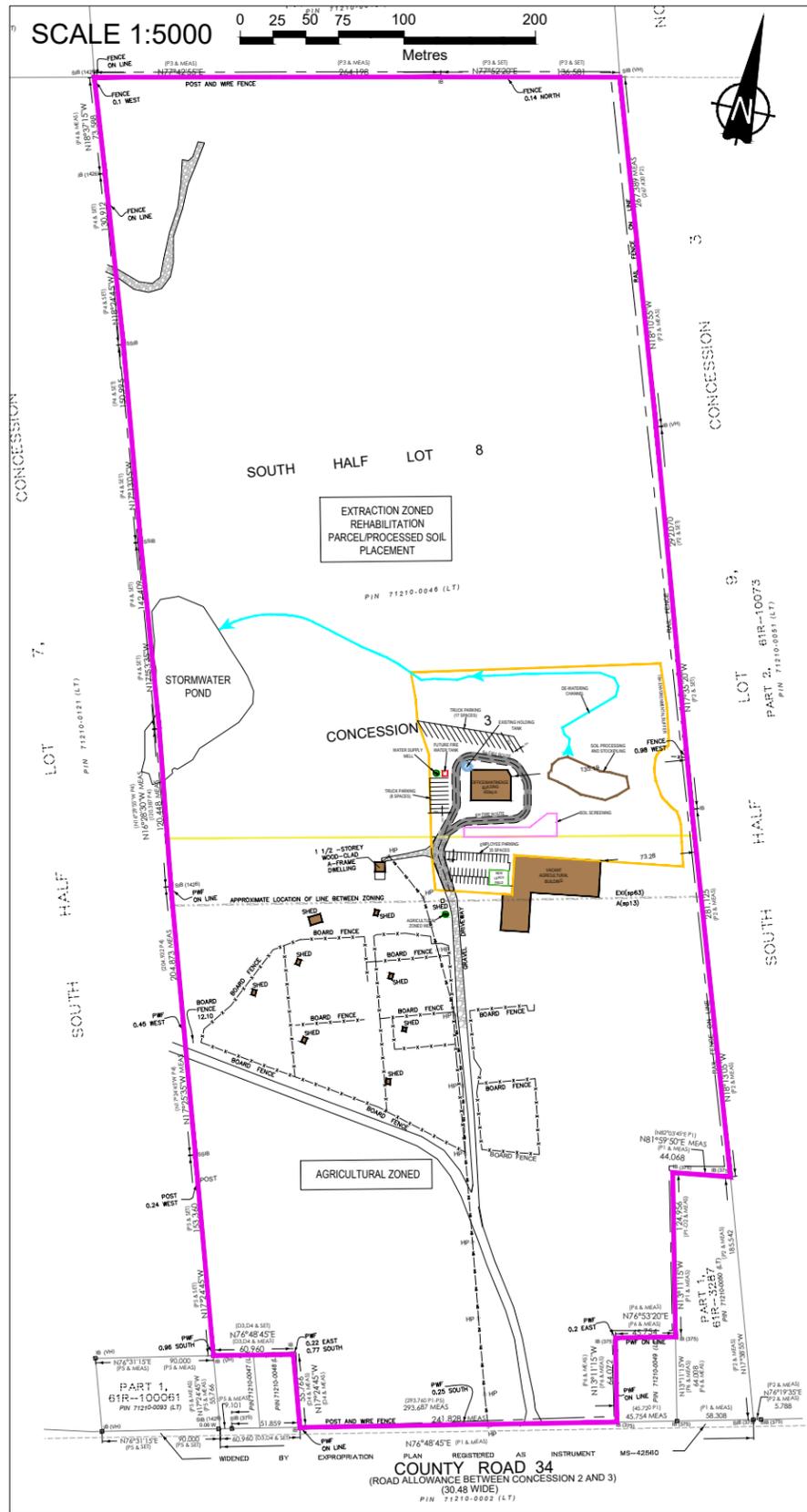


6676-6678 Wellington County Rd 34

Scale 1:10,931
NAD83 UTM zone 17 (EPSG:26917)



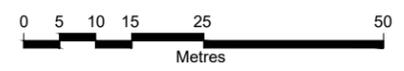
 Parcel - Assessment (MPAC/MNRF)  Site Boundary  Lands Proposed by Applicant for Temporary Use



DEVELOPMENT CONCEPT

6678 Wellington Road 34, Puslinch

-  WATER SUPPLY WELL
-  DE-WATERING CHANNEL
-  SITE/OPERATIONS BOUNDARY (2.89ha.)
-  NEW LEACH FIELD
-  SOIL PROCESSING AND STOCKPILING
-  LICENSE BOUNDARY
-  PROPERTY BOUNDARY
-  SOIL SCREENING AREA



NOTE: This concept should be considered as a preliminary demonstration model that illustrates an 'order of magnitude' development scenario for the site. The number of units, floor area and parking supply are approximate and subject to more detailed design as well as municipal planning approvals.

June 6, 2023 | Project No. 24038 | Drawn By: EF



Comment Summary – 6676-6678 Wellington Rd 34

Preconsultation

Joe Nethery – Township Planning Consultant	Comments pending
GEI – Township Engineers	See letter attached
County Planning Comments	Comments pending
Hydrogeology Comments	See letter attached
Ecology Comments	See letter attached
Township of Puslinch Fire Department	No comments
Township of Puslinch Building Department	<ol style="list-style-type: none">1. Clarify the use of the “office” building that is labelled on “Figure 2” drawing provided. Will this be used only as an office? Provide preliminary floor plans to support the proposed/existing use.2. Building Permits are required for the office, septic system and any retaining walls greater than 1m in height that have been built without the benefit building permit.3. The existing office exceeds 600m² and will be considered a part 3 building under the building code which will require adequate fire water storage on site and fire routes. Ensure the site plan is updated to reflect the office's actual building area.4. Provide an updated site plan showing all the site features including retaining walls, fire routes (show 6m widths and slope), existing buildings and

	areas, septic systems, fire water storage (size and location), fuel storage and any other site feature related to the proposed operations.
Township of Puslinch Property Standards & By-law Enforcement	No comments
Township of Puslinch Public Works Department	No comments
Sourcewater	See attached
County Transportation Department	No comments
Township Noise Consultant	See letter attached
GRCA	No comments

February 13, 2025

Project No. 2402574 / 120006-017

VIA CLOUDPERMIT: Township of Puslinch

Lynne Banks
Township of Puslinch
4704 Wellington Road 34
Puslinch, ON N0B 2J0

**Re: Pre-Consultation Request
Township File No. D00-ONT
6676-6678 Wellington Road 34
Puslinch, ON**

Dear Ms. Banks:

Following our review of pre-consultation application documents received on January 30, 2025, we are providing comments related to an existing operation on the subject lands located at 6676-6678 Wellington Road 34 in the Township of Puslinch. It is our understanding that the proposed application is a Temporary Use By-Law Amendment for a portion of the site to permit management of liquid waste.

A Zoning By-Law Amendment application was previously submitted for this property and was denied by the Township. A Temporary Use By-Law would permit a land-use that is otherwise prohibited by the Zoning By-Law on the subject lands for a duration of three years.

In support of the identification of engineering requirements, the following documents were received and reviewed:

- Cover Letter, prepared by GSP Group, dated January 27, 2025.
- Figure 2 (Site Layout), prepared by GHD, dated April 13, 2023.

We provide the following requirements in support of Temporary By-Law Amendment:

- **Site Plan**, generally showing existing and proposed aboveground and underground infrastructure, including but not limited to:
 - Buildings
 - Soil offloading, processing, stockpiling and screening locations
 - Outdoor storage areas
 - Parking areas, loading areas, driveways and walkways
 - Lighting, signage, and fencing
 - Wells and septic system
 - Fire routes and fire protection infrastructure
 - Stormwater management infrastructure
 - Property boundaries and limits of operations and zoning.

- **Site Grading and Servicing Plan**, generally showing existing and proposed drainage patterns on the subject lands, confirming legal drainage outlet, and showing existing and proposed infrastructure and services, including but not limited to water lines, septic systems, sanitary sewers, storm sewers and stormwater management facilities.

- **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.

- **Spills Management Plan**, to document the control of potential spills or contaminated liquid soils on the property.

- **Site Servicing and Stormwater Management Report**, detailing:
 - The existing conditions of the site and any proposed changes to existing infrastructure or operations.
 - How stormwater management and management of imported liquid soil and associated runoff is and will be provided for the site as required by Township standards and MECP guidelines, including:
 - Stormwater and liquid soil runoff quantity control (including stormwater management pond volumes, drawdown times and flow rates under existing and proposed conditions).
 - Stormwater and liquid soil runoff quality control (including TSS removal calculations and sediment removal frequency calculations under proposed conditions).
 - Water balance (including groundwater recharge rates and volumes).
 - Protections and controls related to offloading, stockpiling and processing of potentially contaminated liquid soils.
 - Grading and drainage considerations, including overland flow route and legal outlet.
 - Erosion and sediment controls.
 - Geotechnical and hydrogeological considerations.
 - How the site is serviced by potable water and wastewater servicing.
 - Transportation considerations.

The existing stormwater management pond appears to encroach onto adjacent property. Are there any concerns that this could be an issue in present day or in the future if either property is sold?

The Township Hydrogeologist should comment on hydrogeological study requirements and potential groundwater contamination concerns related to site operations.

The Puslinch Fire Department should comment on requirements for fire protection and access.

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



Parth Lad, E.I.T.
Technical Specialist



Harden Environmental Services Ltd.
4622 Nassagaweya-Puslinch Townline
Moffat, Ontario, L0P 1J0
Phone: (519) 826-0099 Fax: (519) 826-9099

Groundwater Studies
Geochemistry
Phase I / II
Regional Flow Studies
Contaminant Investigations
OMB Hearings
Water Quality Sampling
Monitoring
Groundwater Protection
Studies
Groundwater Modeling
Groundwater Mapping
Permits to Take Water
Environmental Compliance
Approvals

Our File: 2135

March 13, 2023

Township of Puslinch
7404 Wellington Road 34
Guelph, ON, N1H 6H9

Attention: Mr. Glenn Schwendinger
CAO

Dear Glenn;

Hydro-Vac Truck Disposal Area: 6678 County Road 34, Puslinch Township

We have received and reviewed additional draft information provided by the applicant. In response to concerns related to the permeable and vulnerable underlying aquifer condition, the following measures are suggested;

- Offloading of slurry on impermeable base
- Drainage of slurry through a lined drainage channel
- Storage of water in a lined pond with a control structure
- Release of water only when tested "clean" in comparison to Table 2 Potable Groundwater Criteria (*Full Depth Generic Site Condition Standards in a Potable Ground Water Condition All Types of Property Use, as provided in the Table 2 of the MECP document entitled "Soil, Ground Water and Sediment Standards for Use Under Part XV.1 of the Environmental Protection Act", dated April 15, 2011*).
- Water released to existing aggregate pond for irrigation or infiltration

In comparison to the present ongoing operation, the proposed measures reduces the risk of groundwater contamination from the offloading of untested slurries from the Hydro-Vac Trucks.

It remains our recommendation to the Township of Puslinch to not permit this activity through a zoning amendment. The ongoing and

proposed activity does not fall within the permitted activities for the existing zoning and the requested activities come with risk to the underlying groundwater resources.

The Township and County adopted the Paris and Galt Moraine Policies to protect the groundwater resources lying thereunder. The underlying geological formations are the source areas for local water supplies. The only available water supply comes from the groundwater aquifers and despite all assurances provided to date, the requested activity involves the offloading of untested sediment/water slurries. Although containment, testing and conditional release of water procedures will be in place, it remains our opinion that the hydrogeological setting is inappropriate for this activity given the reliance of local residents on the groundwater resource. In addition, there is continued pressure from the City of Guelph and Region of Waterloo for additional groundwater resources sourced from this area.

There are suitable locations for this type of activity below the escarpment where there are lake-based municipal drinking water systems and low permeability soils. There are also hydrogeologically suitable areas north of Guelph where lower permeability formations at surface do not allow for rapid transmission of contaminants to aquifers.

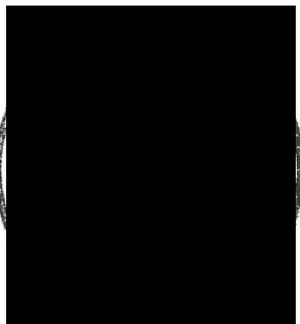
Given an opportunity to deny this activity, we continue to recommend that the Township prohibit this activity at this site.

Sincerely,

Harden Environmental Services Ltd.



Stan Denhoed, P.Eng., M.Sc.
Senior Hydrogeologist





3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

February 14, 2025

Lynne Banks
Development and Legislative Coordinator
Township of Puslinch
7404 Wellington Rd. 34, Puslinch, ON
N0B 2J0

RE: 6678 Wellington Rd. 34 Puslinch Pre-Consultation Request - File # D00-ONT

Thank you for inviting Dougan Ecology to provide comments on the pre-consultation request for the above listed property.

A Zoning By-law Amendment was previously submitted for this property alongside an EIS prepared by GHD (2022). This application was refused by the Township following review. The Owner is now proposing a Temporary Use By-law Amendment for a portion of the site, representing 2.16 ha previously used for management of liquid soil. The temporary use provisions would allow the management of liquid waste on the site, for a period of up to 3 years. Following this it would be eligible for an extension of an addition 3 years following Council approval.

The proposed liquid waste management area is located within 120 m of natural heritage features that may be impacted by this work, including:

- Oil Well Bog Little Tract Regional Life Science ANSI;
- Significant Woodlands;
- Significant Wildlife Habitat (confirmed and candidate);
- Species at Risk habitat;
- Waterbodies; and
- Wildlife Corridors

Natural heritage policy applicable to the site includes:

- Migratory Birds Convention Act (1994)



- Provincial Planning Statement Natural Heritage policies (2024)
- Growth Plan for the Greater Golden Horseshoe (2020)
- Paris Galt Moraine Conservation Act (2019)
- Wellington County Official Plan Greenlands (2021)
- County of Wellington Forest Conservation Bylaw 5115-09
- Township of Puslinch Zoning By-law (2018)

The previous EIS was prepared by GHD (2022) in support of a Zoning By-law Amendment for proposed hydro-vac operations on the site. Given that the proposed activities have changed (i.e. the current proposal is for liquid waste disposal), a revised EIS is required to demonstrate natural heritage policy compliance and address potential direct, indirect and cumulative impacts to natural heritage features.

It is expected that the EIS could be largely based on existing background data presented in GHD's EIS (2022) with a revised assessment of impacts, appropriate avoidance, mitigation and enhancement strategies to demonstrate no negative impact to existing natural heritage features and ecological functions. The EIS should clearly demonstrate how the proposal is compliant with federal, provincial, regional, and local natural heritage policy.

We trust this assists the Township in developing the next steps regarding this application.

Sincerely,



Christina Olar, B.Sc. Eco. Mgmt. Tech. ISA
Manager of Ecology



Todd Fell, OALA, CSLA, CERP
Principal, Manager of Landscape
Architecture



Source Water Protection – Planning Application Requirements

As part of the *Clean Water Act* and Source Protection Plan requirements, all proposed development that is subject to a *Planning Act* application on lands located within a vulnerable area shall ensure that proposed development work does not result in a threat to municipal drinking water quality and/or quantity.

Section 1: Property and Application Information

Property Address: 6678 Wellington Road 34

Application Type:

- Official Plan Amendment
 Zoning By-law Amendment
 Site Plan

- Plan of Subdivision
 Plan of Condominium
 Type: _____

Section 2: Documentation to be provided by the Risk Management Office

	ZBA Application	Site Plan Application	Not Required
Section 59 Notice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Risk Management Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Section 3: Documentation required to be provided by the owner or their agents

	ZBA Application	Site Plan Application	Not Required
Appendix A: Contact & Proposal Information	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drinking Water Threats Disclosure Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Liquid Fuel Handling/Storage Spill Response Plan (>250L)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Winter Maintenance Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chemical/ Waste Management Storage Spill Response Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Hydrogeological Assessment Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Water Balance Assessment Report	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Recharge Infiltration Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Flow Meter Installation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Groundwater Monitoring Plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Record of Site Condition	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Phase 1 and/or Phase 2 Environmental Assessments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please see [Appendix B](#) for required documentation descriptions. Please note, if it is determined that a Site Plan Application is not required, the above noted studies must be completed in support of the ZBA application.

Section 4: Site specific information

Wellhead Protection Area (WHPA) and Vulnerability Scores:

WHPA A B C D Q Score 2 4 6 8 10

Issue Contributing Area (ICA): None Chloride Trichloroethylene Nitrate Sodium

Significant Groundwater Recharge Area: Yes No

Highly Vulnerable Aquifer: Yes No

For more information, please contact sourcewater@centrewellington.ca.

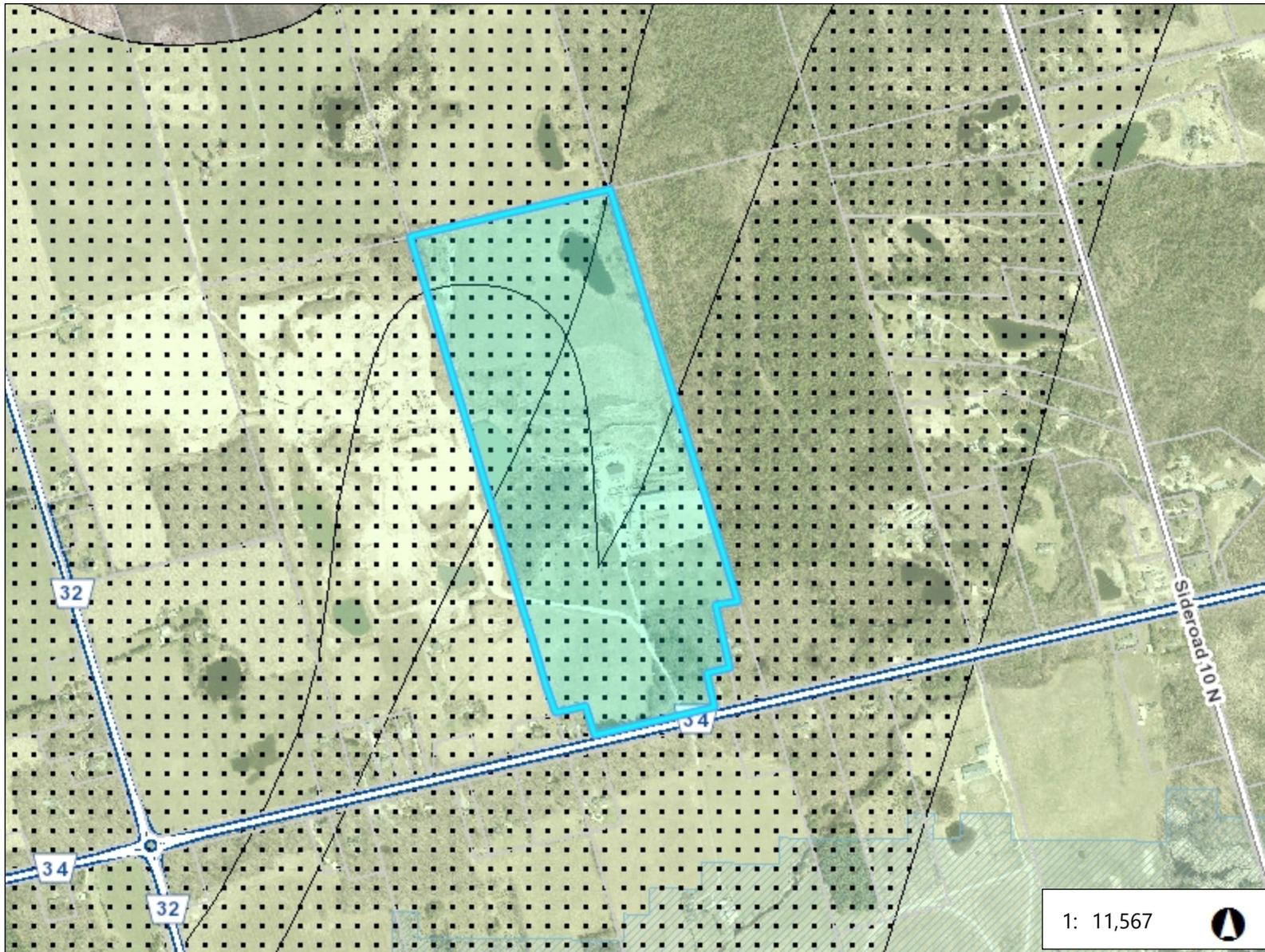
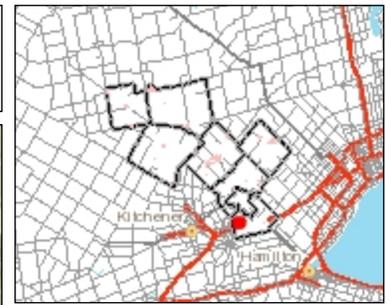
Sincerely,

Kim Funk, Source Protection Coordinator
519-846-9691 ext. 283
kfunk@centrewellington.ca

Attachment: WHPA Map(s)

Resources: [Appendix A: Contact & Proposal Information](#)
 [Appendix B: Source Water Protection required document descriptions](#)
 [Appendix C: Guidance documents](#)
 [Appendix D: Water Balance Terms of Reference](#)

Please note that the requested documentation is applicable as per the information available as of the date signed above. If the proposed application type and/or proposed use changes, there may be additional requirements. Future planning and/or building applications may have additional requirements beyond those listed above or may require reports listed as “not required”, based on the information provided at the time of application.



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

1: 11,567

0.6 0 0.29 0.6 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. Produced using information under License with the Grand River Conservation Authority. Copyright © Grand River Conservation Authority, 2022.

Notes

February 19, 2025

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

Attention: Lynne Banks
lbanks@puslinch.ca

VIA E-MAIL

**Re: Temporary Use By-Law Amendment Application
Liquid Waste Management Facility
Puslinch, Ontario
VCL File: 122-0269**

Dear Ms. Banks:

We have completed our review of the January 27, 2025 letter, prepared by GSP Group, requesting a Pre-Consultation meeting to discuss a Temporary Use By-Law Amendment application. Comments regarding the request are outlined herein.

It appears that the proposed temporary use for a portion of the site is the same or similar to the one previously proposed. The temporary use would initially be permitted for up to three years when the use could be reviewed and extended for a further three years. Even though the use is temporary, it is of long enough duration where potential noise impacts on sensitive receptors in the vicinity is a concern. Thus, the sound emissions from the facility should be mitigated to ensure the noise guideline limits for stationary noise sources in NPC-300 are met.

A noise study was previously prepared in support of the proposed waste processing facility to be located at this location. The noise study was peer reviewed by Valcoustics Canada Ltd. with outstanding items outlined in our letter dated March 16, 2023. A noise study supporting the proposed temporary use and addresses the outstanding previously identified issues should be included as part of the submission requirements. The temporary use should be considered a stationary noise source as defined in MECP Publication NPC-300.

As stated in the GSP Group letter, compatibility is an item that Council would have regard for. The noise study would be part of demonstrating land use compatibility for the proposed temporary use.

If there are any questions, please do not hesitate to call.

Yours truly,

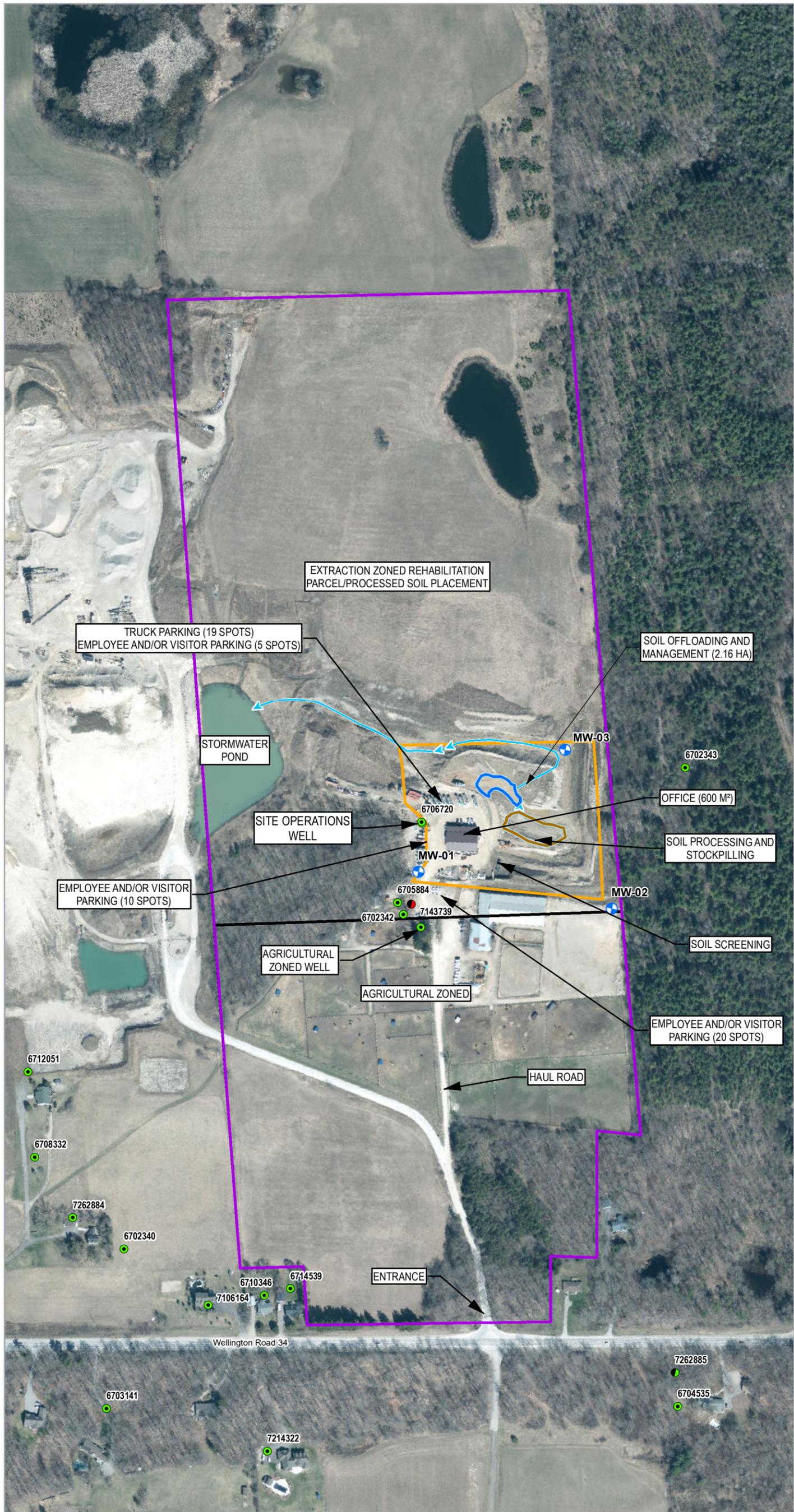
VALCOUSTICS CANADA LTD.

Per:

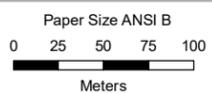


John Emeljanow, P.Eng.

JEV
2025-02-19 Pre Con Request Review V1.0.docx



Legend	
●	Water Supply
●	Abandoned-Supply
●	Abandoned-Other
⊕	Monitoring Well
↔	Drainage Swale
	Temporary Pond
	Unloading/Drainage Area
	Site/Operations Boundary
	Property Boundary



Map Projection: Transverse Mercator
 Horizontal Datum: North American 1983 CSRS
 Grid: NAD 1983 CSRS UTM Zone 17N



2374868 ONTARIO INC.
6678 WELLINGTON RD 34
TOWNSHIP OF PUSLINCH, ON

Project No. **11210029**
 Revision No. -
 Date **Apr 13, 2023**

SITE LAYOUT

FIGURE 2



SHAPING GREAT COMMUNITIES

January 27, 2025

File No. 24038

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

Attn: Lynne Banks
Development and Legislative Coordinator

**Re: 6678 Wellington Road 34
Pre-Consultation Meeting Request
Temporary Use By-law Amendment Application**

Dear Lynne,

On behalf of 2374868 Ontario Inc. (the “**Owner**”), GSP Group is pleased to submit the following letter as part of our formal request for a Pre-Consultation Meeting to discuss a proposed Temporary Use By-law Amendment application (the “**Application**”) for a portion of the property located at 6678 Wellington Road 34 in Puslinch (the “**Site**”).

Background Information

The entire property at 6678 Wellington Road 34 in Puslinch is 39.4 hectares in size and has frontage onto Wellington Road 34. The northern part of the site is a gravel pit mostly under rehabilitation pursuant to a License under the *Aggregate Resources Act* (“**ARA**”) issued by MNR. As part of those operations, liquid soil was processed and used for the rehabilitation of the gravel pit.

The Site is designated Secondary Agricultural and Greenlands in the County of Wellington Official Plan. The Site currently has dual zoning. The south portion of the Site is zoned Agricultural with special provision 13 (Asp13). Within the Asp13 zone, agricultural uses, normal farm practices and farm related businesses are permitted. The north portion is currently zoned Extractive Industrial with special provision 63 (EX1sp63). The Extractive Zone permits uses as regulated under the MNR license.

On October 10, 2024, the Ministry of Environment, Conservation and Parks (the “**MECP**”), issued an Environmental Compliance Approval (“**ECA**”) (Waste) for the Site. The application for the ECA was applied for under *section 20.2 of Part II of the Environmental Protection Act*, for approval of a waste disposal site to be used for the processing of excess soil, including liquid soil. The ECA provides for, among other items, comprehensive soil, surface water and groundwater sampling, monitoring, reporting and contingency programs.

PLANNING | URBAN DESIGN | LANDSCAPE ARCHITECTURE

72 Victoria St. S., Suite 201, Kitchener, ON, N2G 4Y9
162 Locke St. S., Suite 200, Hamilton, ON, L8P 4A9
gspgroup.ca

On October 10, 2024, the MECP also issued an Air and Noise ECA for the Site. The approval governs the air and noise emissions from the hydrovac processing equipment and operations. The ECA provides for, among other items, a comprehensive operation and maintenance program for trucks and processing equipment.

On November 5, 2024, the MNR approved the split of License #20085 between Capital Paving Inc. and the Owner, creating License #626648 which governs all of the licensed area on the Owner's property.

The Owner is currently in the process of removing the area that is subject to the ECA for the processing of liquid soil from the ARA license, which would come into force upon the rezoning of the site.

The Application

We understand that a Zoning By-law Amendment was previously submitted for the property and was refused by the Township.

The Owner is now proposing a Temporary Use By-law Amendment for a portion of the Site within the EX1sp63 zone representing the area on the Site previously used for the management of liquid soil (see **Figure 1** attached), which is 2.16 hectares in area. The temporary use provisions would permit the management of liquid waste on the Site, for a period up to 3 years. After 3 years, the use could be reviewed and extended for an additional 3 years, subject to Council approval. All other uses associated with the operations are permitted under the amending License #626648 with the MNR and the MECP Waste and Air & Noise ECAs.

Section 13.4 of the County of Wellington Official Plan states that a by-law may be passed by a local council to allow the temporary use of land for a purpose that is otherwise prohibited by the Official Plan or Zoning By-law. A Temporary Use By-law may not exceed three years but may be extended. When considering a Temporary Use By-law, Council would have regard for the following: the likely duration; compatibility; the adequacy of services; access and parking; impact assessment; and general conformity with the County Official Plan.

The demand for liquid waste disposal sites is expected to increase due to a number of factors, including:

- **Growing volume of liquid waste:** As urban areas expand and infrastructure projects are completed, so does the amount of liquid waste generated from hydrovac operations. Hydrovac operations are a critical infrastructure service used by municipalities, utilities and landowners to prevent inadvertent underground utility strikes and support emergency services such as power line failures and water main breaks.
- **Environmental Awareness:** As environmental awareness grows, so does the need for advanced liquid waste treatment. With approved ECAs, there are extensive and

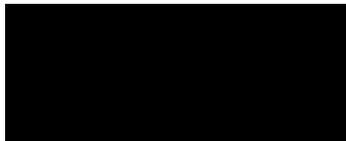
comprehensive environmental and other measures in place that will ensure protection of the natural environment. Providing an approved liquid waste disposal site will prevent illegal dumping. Illegal dumping can cause health concerns and long-term environmental damage.

- **Lack of Local Sites:** A liquid waste disposal site will service local municipalities who are actively involved in ongoing infrastructure projects. This also includes local utilities including gas and hydro companies. Currently, liquid soil being collected in Waterloo Region/Wellington County is hauled to the closest waste disposal site located in Stoney Creek, ON. This means greater costs to the municipality and the utility and ultimately the public to haul the waste to another municipality, as well as greater impact to the environment due to truck travel and associated consumption of gas, diesel fuel and emissions.

We look forward to meeting with the Township to discuss the proposed Temporary Use By-law to permit the management of liquid soil on the Site as a temporary use. We believe there is a benefit between the proposed use and the continued need for the rehabilitation of the licensed former gravel pit, as well as a benefit to the wider community by providing a certified disposal site for liquid soil.

We look forward to receiving pre-consultation comments and meeting with staff and agencies to discuss this proposal further.

Sincerely,
GSP Group Inc.

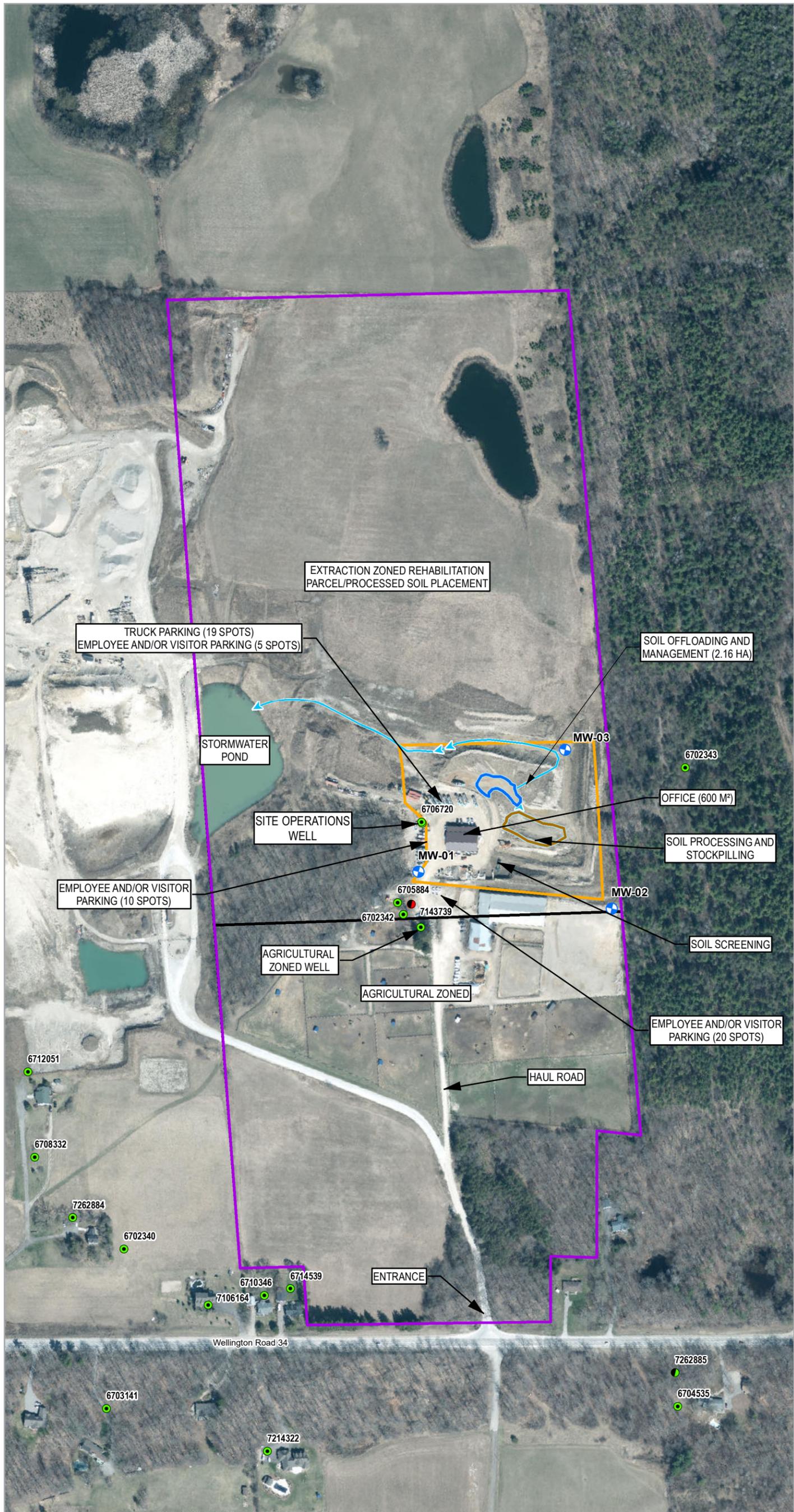


Hugh Handy, MCIP, RPP
Vice President



Valerie Schmidt, MCIP, RPP
Planning Development Manager

Cc: Frank Ertl, Owner
Fred Taylor, GHD
Amelia Soutar, GHD



Legend	
●	Water Supply
●	Abandoned-Supply
●	Abandoned-Other
⊕	Monitoring Well
↔	Drainage Swale
	Temporary Pond
	Unloading/Drainage Area
	Site/Operations Boundary
	Property Boundary

Paper Size ANSI B
 0 25 50 75 100
 Meters
 Map Projection: Transverse Mercator
 Horizontal Datum: North American 1983 CSRS
 Grid: NAD 1983 CSRS UTM Zone 17N



2374868 ONTARIO INC.
6678 WELLINGTON RD 34
TOWNSHIP OF PUSLINCH, ON

Project No. **11210029**
 Revision No. -
 Date **Apr 13, 2023**

SITE LAYOUT

FIGURE 2

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER _____

**A BY-LAW TO AMEND BY-LAW NUMBER 023/18, AS AMENDED,
BEING THE ZONING BY-LAW OF THE TOWNSHIP OF PUSLINCH**

WHEREAS, the Council of the Corporation of Puslinch deem it appropriate and in the public interest to amend By-Law Number 023/18 pursuant to Section 34 & 39 of the Planning Act, R.S.O. 1990 as amended;

**NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE
TOWNSHIP OF PUSLINCH ENACTS AS FOLLOWS:**

1. That Schedule “A” of By-law 023/18, as amended, be further amended by rezoning the lands described legally as Part of South Half Lot 8, Concession 3, and known municipally as 6678 Wellington Road 34 in the Township of Puslinch, from Extractive Special Provision (EXI)(sp63) to a Temporary Special Provision (EXI^X) as shown on Schedule “A” to this By-law.
2. That Table 16.1 of By-law 023/18 be amended by adding the following Temporary Special Provision (EXI^X):

No.	Zone	Temporary Uses	Date Enacted	Date Expired
X	EXI(sp63)	In addition to the uses permitted in subsection 9.2, permitted uses include a liquid soil management operation/business limited to a 1-storey, 650 square feet office/maintenance building, area for soil offloading and management, soil processing and stockpiling and screening including a temporary pond and drainage swale. A maximum of 25 truck parking spaces and 35 employee/visitor are permitted.	_____, 2025	_____, 2025

3. That except as amended by this By-law, the subject lands as shown on Schedule “A” to this By-law, shall be subject to all other applicable regulations of By-law 023/18, as amended.

4. Schedule "A" attached hereto forms part of this By-law.

5. This By-law shall take effect from its date of passage by Council and shall come into force either upon approval by the Ontario Land Tribunal or upon compliance with Sections 34 and 39 of the Planning, R.S.O. 1990, C.P 13.

READ A FIRST AND SECOND TIME THIS _____ OF _____, 2025.

MAYOR

CLERK

READ A THIRD TIME AND PASSED THIS _____ OF _____, 2025.

MAYOR

CLERK

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER _____

Schedule "A"

INSERT MAP

This is Schedule "A" to By-law No. _____

Passed this ____ day of _____, 2025.

MAYOR

CLERK

THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

EXPLANATION OF BY-LAW NO. _____

By-law Number _____ amends the Township of Puslinch Zoning By-law 23/18 by rezoning Part of South Half Lot 8, Concession 3, and municipally referred to as 6678 Wellington Road 34 to permit the temporary use of a liquid soil management operation including parking for truck and vehicles for a temporary period of three (3) years.

The area subject to be rezoned for the temporary use is approximately 2.9 hectares (7.2 acres) in size with one building on-site as shown on Schedule A.

Within the County's Official Plan, the area to be rezoned is designated as Secondary Agricultural and Greenlands. The land use permissions for the Secondary Agricultural designation allows for aggregate extraction and ancillary uses.



CAPITAL PAVING INC.

Quality Construction by Quality People
P.O. Box 815 Guelph, Ontario N1H 6L8

November 11, 2025

Township of Puslinch

7404 Wellington Rd. 34

Puslinch ON N0B 2J0

Delivered VIA email to: jbrotherson@puslinch.ca

ATTENTION: Justine Brotherson, Interim Municipal Clerk

RE: Zoning By-Law Application, D14/ONT (2374868 Ontario Inc.)
6678 Wellington Rd. 34, Township of Puslinch

Dear Ms. Brotherson,

This letter is in response to the Notice of Complete Application & Notice of the Public Information Session received by Capital Paving regarding the above noted Zoning By-Law application.

This application is for lands that are adjacent to Capital lands and as such, Capital has a direct interest in this application.

While we do not have objections to the current application, based on current and publicly available information at the moment, Capital would like to preserve its rights to comment in the future should any changes directly impact the lands owned by Capital.

We also request to be on the circulation list for any future notices or decisions regarding this application.

Should you have any questions, please do not hesitate to call me at 519 – 822 – 4511.

Yours truly,

CAPITAL PAVING INC.



George Lourenco, P.Eng
Director, Lands & Resources



Alison McCrindle
6639 Wellington Rd 34,
Cambridge, ON N3C 2V4

Nov. 12, 2025

Dear Township of Puslinch Council and Staff,

I am writing to express my concerns about the proposed Temporary Zoning By-law Amendment at 6678 Wellington County Rd 34. I am opposed to this idea for the following reasons:

1. I do not believe that Badger will continue their operations on a temporary, three-year basis. The company has been operating on this property for almost two decades without the proper zoning. Their track record shows that they are not to be trusted to stop operations in three years.
2. I agree with GSP Consultants that, "Hydro-vac operations are a critical infrastructure service". However, this land is not a suitable choice for a hydro-vac operation. There are neighbouring residences that are, and will continue to be impacted. There is a risk that neighbouring wells could be contaminated. Furthermore, Dougan Ecology's letter to the Township stated that the property is "located within 120 m of natural heritage features that may be impacted by this work, including: Oil Well Bog Little Tract Regional Life Science ANSI; Significant Woodlands; Significant Wildlife Habitat (confirmed and candidate); Species at Risk habitat; Waterbodies; and Wildlife Corridors". As such, this is not an appropriate place for dumping liquid waste.
3. We have been "assured" by the consultants hired by Badger that all of the soil and water is being tested. Who is collecting the samples? Badger? What laboratory is testing these samples? Is the laboratory capable of testing for the tiny levels of potential toxins that may be present in the waste? In the ECA (A-500-4277838045) issued to Badger on Oct. 10, 2024, under Terms and Conditions #25, it is stated that, "The Owner shall ensure that discrete samples are taken and analysed for:
1. metals, 2. Hydride-forming metals, 3. petroleum-hydrocarbons (PHCs), 3. Benzene, toluene, ethylbenzene, xylene (BTEX), 5. Volatile organic compounds (VOCs), 6. Polycyclic aromatic hydrocarbons (PAHs), 7. Acid/base/neutral compounds (ABNs), 8. Chlorophenols (CPs)."
Is this actually happening? Is testing being done by a third party?
Furthermore, the ECA states that, "The Owner shall ensure that any additional sampling and analysis specific to the receiving site shall be carried out as required by the local municipality, the local conservation authority and any applicable federal/municipal legislation." Is the Township asking for additional analysis to take place?
Under Terms and Conditions #28 of the ECA, "The Owner shall construct liners under all storage areas and under all process water collection/storage and conveyance pathways on-site no later than 90 days from the date of issuance of the Approval in order to prevent uncontrolled infiltration of process water or contact water at the Site" and "submit as-built drawings showing construction details for the above-noted liners to the Director no later than 120 days from the date of issuance of this of this Approval." Today, I spoke to Lynette Armour, Senior Environmental Officer for Puslinch. To date, she has not received this documentation even though it has now been over a year since the ECA was issued. She has also not been on the property to inspect it.
4. The Applicant has asked for a Temporary Zoning Amendment for 2.9 hectares of the property, where the waste is to be dumped. This does not take into consideration the many impacts that

this kind of operation has on the rest of the property. There are dozens of hydro-vac trucks coming and going and parking there. Are all of these trucks refuelling on-site? If so, are the refuelling and fuel storage practices in compliance with the laws? The trucks are being washed on-site. Is the run-off of waste water from this activity being handled safely? How much water is being used to fill these hydro-vac trucks and wash them? Terms and Conditions #9 of the ECA states that, "the Owner shall ensure that any water taking is only in accordance with a Permit to Take Water where such a permit is required". Is a permit required to take water from this site and if so, has it been issued? Are the trucks being maintained on site? Is this being handled safely? What type of building and flooring is being used to carry out maintenance? Did Badger get building permits for this type of building? In addition to the hydro-vac trucks entering, exiting and parking on-site, there is the additional impact of staff traffic. The plan says that there are 35 parking spaces for staff. Once again, this type of activity is not an appropriate use of lands that are zoned Agriculture/Greenlands. It is an industrial operation that should be in industrially zoned lands.

5. The Applicant maintains that the soil that is being brought in is being used to "rehabilitate" the gravel pit. Is this actually happening? How long will it take to rehabilitate the gravel pit using this method? Three years? Is there an actual plan on file regarding rehabilitation of this gravel pit and is Badger's waste part of it?

Prior to the last attempt to have a Zoning Amendment, the Applicant brought in hundreds and hundreds of loads of "fill" from construction on the 401. They admitted to this at the time of the last public hearing and were asked by the Mayor, "did you have approval for this?" The response from the consultant was, "we are working on it." They were working on getting approval for soil brought on to the site, after the soil was already there? Did they get it? Was this soil ever tested? What is leaching out of it into the groundwater?

6. The Consultants for Badger have said that this location is very suitable as it is "out of sight". I would suggest that this makes it very suitable for the Applicant. "Out of sight", has meant that they have been able to run this operation for years, hiding their practices from the citizens of Puslinch. What type of tax rates is the company paying The Township to operate on this land? Aggregate rates? Agricultural rates? I would hope that The Township is receiving Industrial level taxes from this "industrial" scale operation?
7. GSP Consultants themselves make the point that, "As environmental awareness grows, so does the need for advanced liquid waste treatment. With approved ECAs, there are extensive and comprehensive environmental and other measures in place that will ensure protection of the natural environment. Providing an approved liquid waste disposal site will prevent illegal dumping. Illegal dumping can cause health concerns and long-term environmental damage." This point is ironic, considering Badger has been dumping liquid waste (illegally?), for years, at this property without proper zoning. How can this company be trusted? It seems that they have been "playing the system" for years now.

In closing, thank you for taking my questions and concerns into consideration. I hope that Council will refuse this Temporary By-law Amendment Application.

Yours sincerely,

Alison McCrindle

Monika Farncombe

From: Robert McCrindle [REDACTED]
Sent: Thursday, November 13, 2025 3:22 PM
To: Admin
Cc: [REDACTED]
Subject: Badger "Pre-Consultation Meeting" I write from the

Caution! This message was sent from outside your organization.

[Allow sender](#) | [Block sender](#) | [Report](#)

I write from the perspective of someone with an up-to-date knowledge of how to measure the concentrations of persistent organic pollutants (POPs) in environmental samples. Currently, the major challenge has shifted on from PFAS, the “live forever” compounds, to the tiny fragments, “microplastics” produced by degradation of a plastic item. These are now being detected in matrices all over the world and concerns have arisen about the large amount of danger they pose to the environment. Of particular concern are the products of tire wear, tire wear particles (TRPs). They are both the most abundant of microplastics in the environment but also the most toxic. Thousands of papers have been published in the last twenty years in support of that contention. The amount of attention, because of their toxicity and wide distribution, far outstrips that of most other POPs, for example PCBs or Dioxins. One does not have to read the scientific literature to see the evidence. One can find many of the relevant details by simply using Google and searching, for example, “tire wear particles and health,” One finds information of the following nature.

“Tire wear particles (TWPs) are a significant source of microplastics and chemical pollution in Canada. They are linked to various health concerns, including respiratory issues,”

“Every year, billions of vehicles worldwide shed an estimated [6 million tons](#) of tire fragments are released in Canada each year. These tiny flakes of plastic, generated by the wear and tear of normal driving, eventually accumulate in the soil, in rivers and lakes, and even in our food. Researchers in [South China](#) recently found tire-derived chemicals in most human urine samples.”

“These tire particles are a significant but often-overlooked contributor to microplastic pollution. They account for [28% of microplastics](#) entering the environment globally.”

“Despite the scale of the issue, tire particles have flown under the radar. Often lumped in with other microplastics, they are rarely treated as a distinct pollution category, yet their unique characteristics demand a different approach.”

“Already, researchers have [linked](#) TWPs and their additives to cell damage, lung inflammation, heart problems, reproductive risks and digestive issues in animal and human cell studies.”

Google searches reveal – (i) road dust often contains 15-25% of TWPs (ii). The smallest particles can be transported by air currents to remote locations (iii) Large quantities are washed out with some reaching the oceans (but often p large fish kills along the way (iv) A high proportion remains close to the highway.

Turning now to the relevance of the preamble above to the current application, I note that at the Township of Puslinch Information meeting held on November 30, 2022, on an earlier Badger application Fred Talor, GHD, estimated that “probably half, maybe two-thirds” of the Hydrovac residue would come from sites “close to roads”. In Canada, the current regulations state that “the slurry, which is approximately 60% water and 40% solids, must be transported by licensed haulers to an authorized waste management facility or a dedicated Hydrovac processing/recycling site. Are there any analytical labs in this whole area with the capability of testing for TWPs and if there are, can they test at levels that are appropriate for current knowledge? Will all water be held until it is tested?

To be blunt, Puslinch Township should not approve this request until it gets a reassurance from MECP that the questions I pose above can be answered in the affirmative.

It is worth noting that the research branch of MECP has scientists who publish research papers on TWPs (for example Dr. Paul Helm).

Thank you.

Dr. Robert McCrindle, DSc, PhD
Professor Emeritus (University of Guelph)
Senior Research Advisor
Wellington Laboratories Inc.
345 Southgate Drive
Guelph, Ontario, Canada N1G 3M5

November 13, 2025

Justine Brotherston
Municipal Clerk
Township of Puslinch

RE: Zoning by law amendment D14/ONT (2374868 Ontario – Ertl)

Dear Ms. Brotherston,

Thank you for the opportunity to comment on the Badger zoning application. We have previously commented on a proposed zoning change in 2022 and are one of Badger's closest residential neighbors. We continue to have concerns regarding the operation's potential effects to our private drinking water well.

We are please to see the requirement of a Ground Water Monitoring Plan for the site as required by the Environmental Compliance Approval (ECA) issued by the Ministry of the Environment Conservation and Parks. We have reviewed it and other documents and have the following comments in relation to the zoning application.

1. According to section 19.2 of the ECA, waste may be processed and managed at the Site 24 hours per day, 7 days per week, unless otherwise restricted by municipal by-laws.
 - Comment: We ask that when reviewing the application the Township consider if any additional mitigation measures are needed to ensure the activity is not a disturbance to residential neighbors.

2. According to section 24.5 of the ECA, process water may be infiltrated at the Site provided the waste is tested prior to discharge in accordance with the Monitoring Plan
 - Comment: We ask that prior to making a decision, the Township and their consultant(s) review and confirm that the monitoring plan is satisfactory to protect neighboring private drinking water wells and the aquifers we depend on.

3. The ECA requires annual monitoring reports beginning 12 months after issuance. Since the ECA was issued in October 2024, the first annual monitoring report should be available.
 - Comment: Prior to making a decision we ask that the Township and their consultant(s) be provided the soil and water quality data collected and review the Report. Information from the annual report could help inform the zoning decision. If a zoning change is approved, information sharing, and the review of subsequent reports including the Groundwater Trigger Mechanism and

Contingency Plan required under Section 28.9, better ensures concerns can be relayed to MECF, MNR and neighboring residents in a timely manner to better protect the drinking water of surrounding residents.

4. We note the ECA requires financial assurance in the amount of \$119,505.
 - Comment: It is unlikely that this would be adequate to fund the replacement or remediation of nearby private drinking water wells were they to be impacted by contaminated groundwater emanating from the site. It would certainly not be enough to off set the negative impact to property values should that occur. Are there actions the Township can take to better ensure (should private wells be impacted), residents are compensated for well remediation work?
5. The stormwater management pond seems to be in the extractive zoned area, outside of the area proposed for the zoning change. Water collected from this pond would also likely include runoff collected from other areas of the site as well as the Capital Paving pit.
 - Comment: It is unclear how water testing results from the storm water management pond would adequately reflect the quality of water draining from the liquid soil stockpile. Ideally any monitoring would be done directly on the water discharging from the waste soil prior to allowing it to infiltrate into highly permeable sand in a groundwater recharge area. We reiterate our concern for our private well drinking water supply
6. Planning and Development Committee meeting on November 12th: Valerie Schmidt from the applicants Consultant, GSP Group, stated that the operation has been in effect for 10 years with no adverse effects to neighboring properties.
 - Comment: Please ask GSP Group to share the monitoring results from the last 10 years on which she basis this conclusion with the adjacent residents. This would help assure us that the operation would not impact neighboring drinking water wells in the future.
7. At the same meeting, Ms. Schmidt and Mr. Frank Taylor also identified that the site would need continued remediation post extraction and the only other alternative is to truck soil in from off site.
 - Comment: This is confusing as much of the northern part of the property has been growing hay for many years including before it was bought by Badger.
 - Comment: It also seems like it would be a Capital Paving Pit responsibility to remediate the area they previously excavated under their aggregate license, not the owners of the property
 - Comment: There is a very large amount of soil of unknown origin that Badger brought in several years ago to construct a large berm across the southern portion of the property (zoned agriculture) which still remains. We would like

to see this soil tested and the results shared. This too could be a threat to our drinking water as rainwater filters through it and into the ground less than 80 meters from our drinking water well.

- If it is clean and suitable, then perhaps it should be considered as an alternative source of soil for use in the post extraction remediation.

Thank you for the opportunity to comment.

Regards,

Robert Hanner and Eva Ammentorp
6692 Wellington Road 34
Cambridge, ON N3C2V4

Monika Farncombe

From: [REDACTED]
Sent: Thursday, November 13, 2025 3:56 PM
To: Admin; Planning
Cc: [REDACTED]
Subject: Badger application for re zoning

Caution! This message was sent from outside your organization.

Barb Hagey
6688 Wellington Road 34
Cambridge Ont.
N3C 2V4

Nov. 13, 2025

Dear township of Puslinch Council and Staff

I am writing to state my opposition to the Temporary Zoning By-law Amendment at 6678 Wellington county rd.34. In my opinion this company has been dumping liquid waste at this location for 20 years. If not 20 years very close to it. Frank and Joe were the first owners of the Badger hydrovac trucks. Frank could verify this. I would think that there are records that would indicate the start of this business.

This business was very well hidden, In my opinion township council never knew they existed.

There was a huge horse stable and indoor riding ring on the property, as well as a bank barn. The bank barn was replaced with another huge building. I believe it's a garage for the Badger trucks. I believe no building permits were ever obtained by Badger to build this structure.

A trucking company was using the Badger property for its operation for quite some time. It added a lot of traffic on the road and into the Badger property.

This property received hundreds of loads of fill changing the landscape dramatically. I would estimate 20 maybe 25 foot elevation. Huge berms were built along the west side of the Little Tract. No berms are found on the east side of the little tract.

When Capital paving ran the gravel pit the end of the driveway at the road, was kept clean, by frequently sweeping and watering. I can't say the same for the Badger operation.

The hydrologists report states that this is not the place for this industrial operation of liquid waste. The report states that a more suitable location would be areas below the escarpment or north of Guelph.

Would the owner consider relocating to his property where he lives?

No travel time to and from work, this would save fuel and wear and tear on the roads and vehicles.

There doesn't seem to be any guards or catch basins around the oil tanks/gas tanks. Is this legal? Should there be safeguards put in place in case of a spill?

I wonder how much water is used to wash the trucks. How much water is used in a day, or a week, or a month. Can the water table maintain the use of 25 trucks. I understood from the previous meeting that the truck allotment would be 19 at the most. Is oil and or grease being washed off the trucks into the soil and eventually the ground water.

Mike Mobile, Tire delivery service, UPS, Wasteco, Purolator, UPS, other hydrovac companies add to the traffic on the road and into the Badger property.

How is the testing of each truck load done? What laboratory does it go to? What company takes the soil sample from each truck. Is the sample take. At every job site?

Three years is a long time for a temporary permit.

I oppose this application for a zoning by law amendment 023-2018. File D14/ONT(2374868Ontario-Ertl).

Respectfully submitted
Barb Hagey

Sent from my iPad