
Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

March 2, 2022

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

Attention: Ms. Lynne Banks

RE: Request to Schedule Public Meeting and Project Update - Audrey Meadows Ltd. – Part Lots 17, 18, and 19, Concession 8, Township of Puslinch

Stovel and Associates Inc. (“SAI”) requests that the Township of Puslinch schedule the statutory public meeting under the *Planning Act* for the Official Plan Amendment (“OPA”) and Zoning Bylaw Amendment (“ZBA”) applications made on behalf of Audrey Meadows Ltd. SAI requests that the statutory public meeting be scheduled for the first available date as these applications have been pending for a considerable time.

In order to assist the Township and County in moving the applications forward, SAI has been requested by Audrey Meadows Ltd. to prepare an update on the project for the Township of Puslinch and related agencies. This letter report provides a summary of the following: a) application timeline, b) public consultation, c) revised development concept, and d) issues/response matrix.

Application Timeline

Audrey Meadows submitted the application for an Official Plan Amendment (“OPA”) on April 19, 2021 and Zoning Bylaw Amendment (“ZBA”) on June 22, 2021. The County of Wellington deemed the OPA complete on September 15 2021. The Township of Puslinch deemed the ZBA complete on September 24, 2021.

On August 23, 2021 (and subsequently on August 25, 2021) the Township of Puslinch forwarded peer review comments from their planning review team. Subsequent to reviewing the comments from the Township of Puslinch peer review comments, SAI provided a response to the Natural Resources Solutions Inc. (“NRSI”) on December 27, 2021. Other peer review comments have also been responded to as set out in the attached matrix.

Public Consultation

Audrey Meadows Ltd. received comments from the adjacent neighbours. These comments/concerns came directly from the neighbours and not through the Township of Puslinch. Audrey Meadows Ltd. has reached out and has engaged in open dialogue with several neighbours.

The local neighbourhood group expressed several concerns which were based upon incorrect information, i.e. the proposed undertaking consisted of over 90 lots serviced by communal water

and sewer. This is incorrect as the project originally consisted of a 29 residential lot concept -- now amended to 22 residential lots -- to address concerns raised by the municipal peer reviewers and residents. This reduction was arrived at subsequent to considerable engineering and environmental analysis, together with the agreement by Audrey Meadows Ltd. to make such reduction.

Audrey Meadows Ltd. has attempted to address all of the concerns of the neighbours and has provided the updated development concept to its neighbours. In addition, several adjacent landowners participated in a water well testing program. The results of this program are set out in the Groundwater Science Inc. report.

One of the main concerns relates to the surface water ponding in the northeast portion the existing subdivision, specifically in relation to the infiltration area on the subject property. Audrey Meadows Ltd. is of the view that an engineering solution can be provided through the proposed development. We look forward to working with the Township and their consulting engineer to rectify this matter over the course of the approvals of the subject project.

Revised Development Concept

As noted previously, based on a review of the comments from the Township's peer review team and through consultation with the neighbours, Audrey Meadows Ltd. made the decision to refine the proposed development concept. Audrey Meadows Ltd. requested its engineers, Triton Engineering Services Limited ("Triton") to prepare a revision to the development concept (Drawing 01), resulting in a reduction of the number of lots to 22 (from 29). This revised development concept illustrates that the rear lot lines have been pulled back to the edge of the farm field and minimum rear yard setbacks have been established to protect the forest edge (i.e., 10 m from the dripline). All development proposed in this development concept will remain over 30 m from any wetland limit. This drawing was provided to the Township of Puslinch on December 27, 2021.

Issues/Response Matrix

The attached table provides a summary of the agency comments and the responses from the Audrey Meadows team.

Please note that Audrey Meadows Ltd. in its ZBA application has included a Holding – H Zone provision in its draft ZBA. The Holding Zone provision sets out the following:

- *Prior to the removal of the holding symbol, draft plan approval for a plan of subdivision on the Subject Lands shall be required to be granted, together with entering of a Subdivision Agreement with the Township to satisfy all requirements, including financial, servicing, environmental and other requirements to the satisfaction of the Township.*

Based on this proposed approach, we recognize that peer reviewer comments have made suggestions for incorporation into the future draft plan of subdivision and the associated conditions of draft plan approval. The holding zone mechanism provides protection for the Township so that those peer reviewer comments are incorporated going forward.

On behalf of Audrey Meadows Ltd., SAI respectfully requests that the principle of development be endorsed by the Township and County through the approval of the OPA and passage of the

ZBA, so that Audrey Meadows Ltd. can move to the next step, being the application for and approval of the Draft Plan and associated conditions.

Request

We look forward to being advised of the statutory public meeting date, and continuing to work with the Township and the County in moving forward with this project to provide needed housing opportunities within the Township.

Please do not hesitate to contact me should you have any concerns or questions.

Yours truly,

A black rectangular redaction box covering the signature of Robert P. Stovel.

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

cc: County Planning.

Audrey Meadows – Issues/Responses Summary (March 2, 2022)

Letter	Issue	Response
1. NRSI (August 4, 2021 and January 28, 2022)	1. Agree with general vegetation descriptions for woodland and wetland areas. 2. Several concerns and comments were provided regarding: a) Habitat of Endangered or Threatened Species (Core Greenlands); b) incomplete wildlife and habitat surveys (amphibian and bird); c) presence of vernal pool on offsite lands; d) presence of rock pile and crevices on adjacent lands; e) screening for SWH; f) concerns about tree protection and setbacks; g) concern about wetland delineation and setbacks to wetlands; h) concern about adjacent aquatic resources; i) specification of SWM Plan measures to ensure protection of fish habitat features. 3. Remaining items as per January 28, 2022 correspondence to be addressed as conditions of subdivision approval.	1. No response required. 2. Response to NRSI issues was submitted to the Township on Dec. 27, 2021. Wetland limits were confirmed with GRCA staff and surveyed. A revised development concept plan was submitted showing fewer lots (22 instead of 29) and 30 m setbacks to adjacent wetlands and 10 m setbacks to dripline of woodlands. 3. To be addressed as part of the subdivision approval process (“Draft Plan Approval”).
2. GM BluePlan (July 23, 2021)	No concerns with ZBA from engineering perspective. Several documents/survey requirements noted for submission at the time of Draft Plan Approval.	Triton Engineering has reviewed this letter and agrees that these matters will be considered at the Draft Plan Approval stage.
3. GRCA (August 3, 2021).	1. 15 m buffer to wetland has not been justified. 2. Wetland limits to be delineated by qualified person and surveyed using GPS or Total Station. 3. Several comments regarding Function Servicing and Stormwater Management Report. 4. Requirement to obtain site alteration permit for Regulated Areas. 5. Insufficient information provided to address threatened/endangered species and woodland features.	1. SAI completed wetland survey. The limits were confirmed by GRCA staff and the limits were surveyed and submitted to the GRCA. No concerns have been noted. 2. The dripline limit was surveyed for the adjacent woodland and submitted. 3. The limits of development were revised and submitted to the GRCA. Revised setback limits were noted (30 m from wetland and 10 m from

		dripline of woodland). These setbacks conform to standard GRCA provisions. 4. Triton submitted report to GRCA documenting responses to questions on Stormwater Management Report. Additional detailed documentation to be provided as part of the Draft Plan Approval. 5. Triton has submitted a copy of the EIS Addendum Report to the GRCA. This report addresses many of the GRCA comments. Additional documentation, as required, will be provided as part of the Draft Plan Approval.
4. GRCA (November 1, 2021)	1. Update EIS. 2. 15 m buffer to wetland has not been justified, minimum 30 m required. We recommend that the presence or absence of significant natural heritage features such as threatened or endangered species, significant wildlife habitat, and significant woodland be assessed more fully, using current guidelines and criteria as applicable.	Response memo dated February 24, 2022 for Triton/SAI provides additional information/details. Below is a summary. 1. SAI completed a wetland survey. The limits were confirmed by GRCA staff. EIS Addendum Report was prepared to address comments. The EIS will be updated, as required, once specifics of the development have been established as part of the detailed design stage during Draft Plan Approval (DPA). 2. A 30 m setback has been illustrated on the revised design concept Drawing No. 1. The 10 m dripline setback in portions of the site provides a setback of greater than 30 m to the wetlands. As part of Draft Plan Approval process, the 30 m setback will be re-examined. The EIS Addendum

	3. EIS be revised to interpret and integrate the key findings and recommendations of the hydrogeology assessment. Please confirm that proposed infiltration measures, including the proposed dry pond, will be sufficient to maintain or enhance water quantity and quality within adjacent wetland and watercourse features. 4. A more comprehensive assessment of surface runoff and infiltration rates and volumes on this site is required to clearly demonstrate that the proposed development will not result in an adverse impact on the hydrological functions (i.e. recharge, discharge, and storage) of the wetlands on and adjacent to the subject lands. 5. It is requested that wetland water balance be assessed using the Thornthwaite-Mather method. 6. Confirm that all existing groundwater recharge and stormwater discharge characteristics will be met in accordance with the Mill Creek Subwatershed Study. A detailed monthly water balance will be required at Draft Plan Approval to demonstrate the applicable criteria have been met. 7. Incorporate extended detention of the 25mm storm for erosion control as part of the stormwater	report addresses comments regarding significant natural heritage features. 3. EIS will be updated once details of the SWM strategy have been established as part of the detailed design stage during Draft Plan Approval. Configuration and design criteria of the SWM/Water Balance Strategy will be confirmed as part of the Draft Plan Approval process in consultation with the GRCA. 4. As part of detailed SWM design the mix of runoff and recharge to these areas can be adjusted through the implementation of infiltration facilities and/or adjustment of grading to obtain the optimum runoff/recharge to suit the receivers. This will be confirmed as part of the Draft Plan Approval process in consultation with the GRCA. 5. A water balance calculation using the Thornthwaite-Mather method will be completed as part of the Draft Plan Approval process. 6. SWM strategy will be in accordance with the Mill Creek Subwatershed Study. Water balance calculation considering monthly balance will be provided. Both items to be provided at detailed design during Draft Plan Approval stage.
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	management criteria for the development. Demonstration of how this criterion is met will be required at Draft Plan Approval. 8. Figure 1 – The south portion of Catchment 101 seems to be incorrectly delineated as the high point is located central to the catchment. Revise and delineate catchments based on stormwater outlets.	7. Extended detention of the 25mm storm for erosion control will be included as part of the SWM criteria for the development. Detailed SWM design will be completed as part of Draft Plan Approval. 8. Figure 1 and related data will be adjusted during detail design at the Draft Plan Approval stage once lot fabric and grading/drainage has been confirmed. These changes are minor and will not change the viability of the development or SWM strategy.
5. Wellington Source Water Protection (Aug. 13, 2021)	1. Property located in Significant Groundwater Recharge Area and draft Wellhead Protection Area Q with significant risk level. 2. Section 59 Notice not required. 3. No Clean Water Act requirements applicable for this property related to the management of water quantity threat activities. 4. At Site Plan submission, confirm how lots will be serviced and whether a hydrogeological impact assessment will be a requirement. 5. Recommended that site plan submissions incorporate design measures to ensure aquifer is maintained and that recharge is contaminant-free as possible. Several suggestions for consideration were noted.	These matters will be considered during subdivision approval process and the associated Draft Plan Approval and associated conditions. Also, additional future detailed analysis, such as Servicing and Stormwater Management Report, will address many of these comments at the Draft Plan Approval stage.
6. Harden Environmental (Aug. 23, 2021)	Harden provided preliminary comments on the ZBA application: 1. Numerous closed depressions on the site. Detailed accounting of the water capture in these depressions must be made.	GWS (December 2021) prepared a response to Harden's comments. Additional detailed information to be completed as part of future required studies implemented as a condition of approval in the Draft Plan Approval.

	2. Pre-development storm drainage map is oversimplification of existing site conditions. 3. Nitrate impact analysis is required. 4. Recommendation for three water supply wells to be installed to confirm quantity and quality of underlying aquifer. 5. Quality of Mill Creek found along southern edge of existing subdivision to be considered. 6. Water quality of infiltrated water to be considered. Several conditions of development noted.	
7. Puslinch Fire and Rescue (undated)		To be addressed as part of the Draft Plan Approval.