

**2781-2809 Townline Rd – ZBA – 1<sup>st</sup> Submission Comment Summary**

<b>Consultant</b>	<b>Comments</b>
Source Water	<p>To deem the application complete, a Section 59 (2) (a) Notice is being provided. A copy will be served to the property owner. Please note that a Risk Management Plan (RMP) will be required for this site. Comments pertaining to the RMP and Source Protection requirements will be provided during future planning applications. For the applicant's reference, a copy of the Pre-Consultation Form has been provided, which outlines what is required for Site Plan submission.</p> <p>See attached.</p>
Bylaw Department	No Comments
GRCA	The Property does not contain any GRCA features. Therefore, we do not have any objection to the proposal. Please see the GRCA Map attached.
Building Department	<p>Additional Requirements:            ZBA/OPA amendment comment:            Provide support documentation for water &amp; sewer connections confirming that permissions/policies are place to allow for these connections (see site servicing drawings SW2 for proposed connections).</p> <p>Should this project move the site plan application stage, provide the following at the time of application:</p> <ol style="list-style-type: none"> <li>1. Conceptual elevations and floor plans for each building.</li> <li>2. Preliminary spatial separation calculations</li> <li>3. Demonstrate how adequate water supply for fire fighting purposes can be met if water cannot not be connected Cambridge watermain.</li> <li>4. Preliminary OBC matrix for each individual building</li> </ol>

	<p>5. Show any proposed fire hydrant and Siamese connection locations.</p> <p>6. MECP approval for proposed septic systems.</p> <p>7. Show designated fire routes on the site plan.</p> <p>8. Confirm if roof drainage flow control will be used as part of the storm water management.</p>
Township Roads	No Comments
NPG Planning	See attached letter.
GEI Engineering	See attached letter.
NSRI	See attached letter
Wellington Hydrogeology	See attached letter
Noise Consultant	Given the proximity of the industrial development to existing noise sensitive land uses, a noise feasibility assessment should be included with the submission and not just a generic land use compatibility study.
Traffic Consultant	See attached letter
Fire	No comments

## 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: 2781-2809 Townline Road, Puslinch

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

	Current Application	Future 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

	Current Application	Future 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Recharge Infiltration Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Functional Service Report – Source Protection Design	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Stormwater Management Report – Source Protection Design	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>
Flow meter installation, if applicable	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provincial Approval Documentation, if applicable	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please see [Appendix B](#) for required documentation descriptions.

#### Section 4: Site specific information

Wellhead Protection Area (WHPA), Intake Protection Zone (IPZ), and Vulnerability Scores:  None

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

IPZ  Q

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

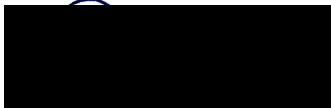
Significant Groundwater Recharge Area:  Yes  No

Highly Vulnerable Aquifer:  Yes  No

With the exception of Appendix A, the requested documentation listed above can be submitted with the Zoning By-law Amendment application, or can be deferred and submitted with future planning applications.

For more information, please contact [sourcewater@centrewellington.ca](mailto:sourcewater@centrewellington.ca).

Sincerely,

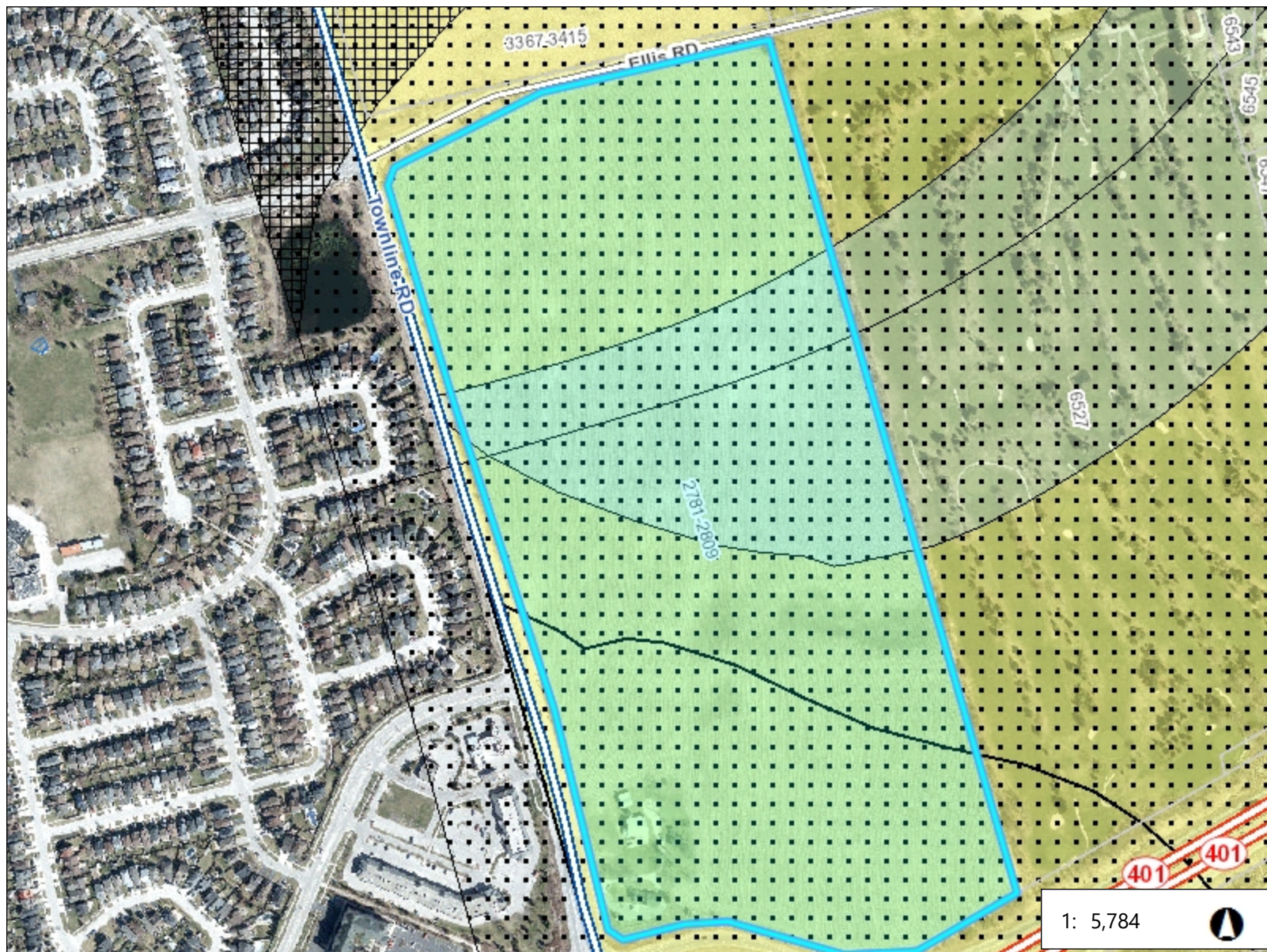


Danielle Fisher, Risk Management Inspector  
519-846-9691 ext. 236  
[dfisher@centrewellington.ca](mailto:dfisher@centrewellington.ca)

Attachment: Vulnerable Area 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
- Prime Agriculture

0.3 0 0.15 0.3 Kilometers

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Notes



Legend

- Parcels
- Roads**
  - Local Road
  - County Road
  - Highway
- Well Locations**
  - Existing
  - Proposed
- SGRA
- RoadsLookup
- Prime Agriculture

0.3 0 0.15 0.3 Kilometers



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

Notes



# Restricted Land Use Notice

## No Prohibition or Risk Management Plan Requirement

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

**Notice Number:** PUS-S59-25-012

**Description and Date of Application/Supporting Documents:** Zoning By-Law Amendment, December 5, 2025 / Drawings, Application, WHPA Maps

**Applicant:** Todd Cullen

**Email:** [toddc@fieldgateproperties.com](mailto:toddc@fieldgateproperties.com)

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

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

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

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

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

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### **Property Owner Information**

**Name:** Fieldgate Properties c/o Todd Cullen

**Mailing Address:** 5400 Yonge Street, Unit 300

**Town:** Toronto

**Province:** Ontario **Postal Code:** M2N 5R5

This Notice is being issued under subsection 59 2(a) of the Clean Water Act, 2006 and was prepared in response to an Application (as described above under Description / Supporting Documents) received for the property that is identified above. One or more of the land uses



proposed to be engaged in, at the above noted property, has been designated as a restricted land use under Section 59 of the *Clean Water Act* and the application is either for a provision of the *Planning Act* prescribed under Section 62, Ontario Regulation 287/07 of the *Clean Water Act* or for a building permit under the *Ontario Building Code*.

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

**Rationale:** This Notice pertains to a Zoning By-law Amendment application submitted for 2781-2809 Townline Rd, Puslinch. To deem the application complete, a Section 59 (2) (a) Notice is being provided. Please note that a Risk Management Plan (RMP) will be required for this site and will include, but is not limited to, winter maintenance activities and chemical handling and storage. Comments pertaining to the RMP and Source Protection requirements will be provided during future planning applications. For reference, a copy of the Pre-Consultation Form has been provided, please note what is required for Site Plan submission.

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

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



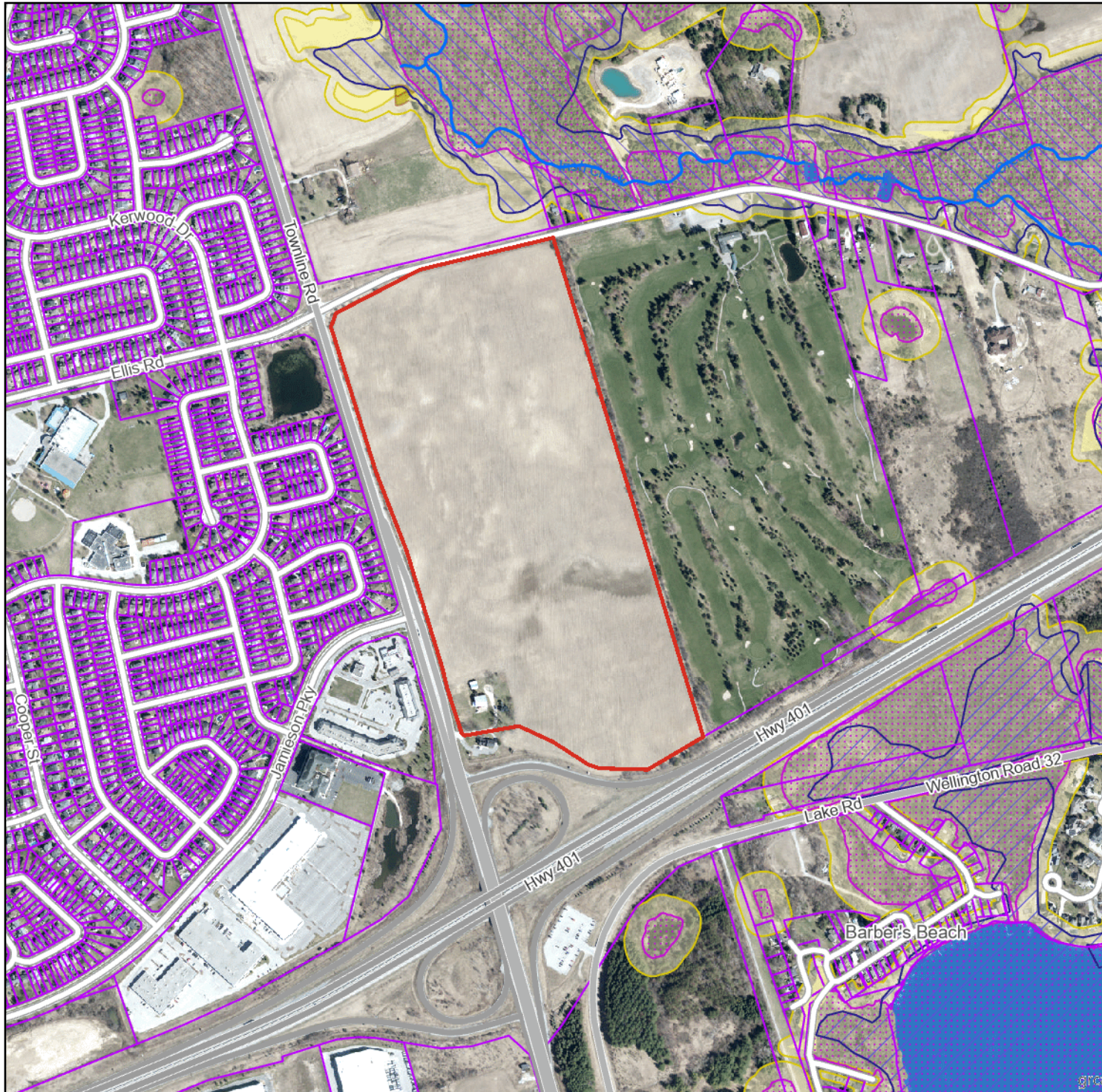
If you require further information, please contact the undersigned.

[REDACTED]  
Nov 25, 2025

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

Attachment(s): WHPA Map(s)  
Pre-Consultation Form

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



Legend

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

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





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December 5, 2025

Monika Farncombe  
7404 Wellington Road 34,  
Puslinch, Ontario

Dear Monika Farncombe,

RE: **NPG Comments**  
**2781-2809 Townline Road**  
**RE: Application for Zoning By-law Amendment**

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NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding a Zoning By-law Amendment Application proposing a prestige industrial centre on lands municipally known as 2781-2809 Townline Road ("Subject Lands"). The applicant has provided two concept plans for the Subject Lands as follows:

- Concept A: three (3) industrial standalone buildings, three (3) industrial condominium buildings (each building containing 11 units), a standalone big-box retail store and a gas bar. The applicant is also proposing 2,384 vehicle parking spaces, 53 trailer parking spaces and 208 loading spaces. For this proposal, the applicant is exploring the possibility of the retail store and gas bar being serviced by the City of Cambridge's municipal services, and the remaining building would be serviced by private on-site services.
- Concept B: five (5) industrial standalone buildings, three (3) industrial condominium buildings (each building containing 11 units). The applicant is also proposing 1,460 vehicle parking spaces, and 274 loading spaces. All the buildings in this concept are proposed to be serviced by on-site private services.

The Subject Lands have a frontage of 407 meters along Ellis Road and are 34.03 hectares in size. The Subject Lands are presently used for agricultural purposes and also include a development showroom near the southwest corner. Surrounding uses consist of agricultural uses to the north, a golf course to the east, a highway, car parking lot and vacant land to the south, a detached residential development and an industrial park in the City of Cambridge to the west.

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

This is the first submission for a Zoning By-law Amendment. As part of this submission, NPG has reviewed the following documents:

- Natural Heritage Assessment prepared by GeoProcess Research Associates Inc., dated October 22, 2025;
- Functional Servicing and Stormwater Management Report prepared by HUSSON, dated November 2025;
- Land Use Compatibility Study prepared by GHD, dated November 13, 2025;
- Grading Plan prepared by HUSSON, dated October 31, 2025;
- Servicing Plan prepared by HUSSON, dated October 31, 2025;
- Survey prepared by J.D Barnes, dated July 15, 2025;
- Topography Survey prepared by J.D Barnes, dated July 15, 2025;
- Conceptual Site Plan A prepared by WARE MALCOMB, dated November 7, 2025;
- Conceptual Site Plan B prepared by WARE MALCOMB, dated November 7, 2025;
- Parcel Register;
- Minimum Distance Separation Report prepared by MHBC Planning Urban Design & Landscape Architecture, dated November 14, 2025;
- Planning Justification Report prepared by Sajecki Planning;
- Private Servicing Assessment Memo prepared by CF Crozier, dated November 10, 2025;
- Traffic Impact Study prepared by GHD, dated November 18, 2025;
- Tree Inventory and Preservation Plan Report prepared by Jackson Arborticulture Inc., dated November 11, 2025; and
- Conceptual Urban Design Brief prepared by WARE MALCOMB, dated November 11, 2025.

**1. Determination of Completeness:**

- a. We have no issues with the Township deeming the Zoning By-law Amendment Application complete from a planning's perspective, provided that there is no objection from other commenting parties.

**2. Additional Requirements:**

- b. Additional requirements are outlined in Section 3 and 4 below.

### 3. High-level Comments:

- a. We have concerns with the proposal from a policy's perspective. The following high-level comments are provided and more detailed comments will follow once the application has been deemed complete.
- b. The Subject Lands are located within Rural Lands as per the Provincial Planning Statement 2024 (PPS). Section 2.6 of the PPS provides policy direction for Rural Lands which promotes development which can be sustained by rural service levels and requires new land uses to comply with minimum distance separation (MDS) formulae. Schedule B7-1 of the County of Wellington Official Plan (County Official Plan) designates the Subject Lands Secondary Agricultural. The proposed uses are not contemplated within Secondary Agricultural areas.
- c. The applicant is proposing to redesignate the Subject Lands to an Employment Area in the County Official Plan. The applicant should provide justification on how the proposed commercial uses in Concept A, including the standalone big-box retail building are consistent with the definition of employment lands provided by the PPS (2024). Additionally, planning analysis of the proposed servicing options against policies under Section 3.6 of the PPS is also required.
- d. Section 6.8.1 of the County Official Plan states rural employment areas will be used by "dry" industrial and limited commercial uses which do not use significant amounts of water in their operation and which do not produce significant amounts of effluent, consistent with rural servicing levels which rely on private water and sewage systems. It is our understanding that the proposed development requires both a Permit to Take Water and an Environmental Compliance Approval for the sewage amount. The applicant needs to demonstrate how the proposed development conforms with this policy of the County Official Plan.
- e. The Township of Puslinch recently concluded the Puslinch By Design study in partnership with the County of Wellington to identify a minimum of 30 hectares of land for rural employment growth. The Township's Council endorsed the redesignation of approximately 139 net hectares of lands to Rural Employment Areas. These lands are proposed to be redesignated to Rural Employment Areas in the County Official Plan through the Official Plan Amendment No. 131 which has not been adopted yet. Policy 6.2.1 of the PPS requires a coordinated, integrated and comprehensive approach to managing and/or promoting growth, economic development strategies and employment projections. Accordingly, we will consider the findings and recommendations of the Puslinch By Design study in the review of the application.
- f. In addition, the development is proposed in lands that are currently designated Secondary Agricultural in the County Official Plan and consist of Canada Land Inventory Class 2 and 3 lands. Based on the proposed scope of the development, we require an assessment of the impacts the development may have on agricultural

activities in the area as per policy 4.6.5 of the County Official Plan. Policy 2.6.4 of the PPS also requires protecting agricultural and other resource-related uses and directing non-related development to areas where it will minimize constraints on these uses. In lieu of an Agricultural Impact Assessment, we may accept an analysis of these policies as part of an updated Planning Justification Report.

- g. Additional analysis of Policy 4.7.1 in the County Official Plan is needed. For clarity, this policy also applies to cities that are adjacent to the County, including the City of Cambridge.
- h. Further, Section 11.2.6 of the County Official Plan anticipates development in the rural system to be on individual on-site water and sewage systems where soil conditions are suitable over the long term. The applicant needs to address this policy with regard to the proposed municipal servicing being considered for Concept A. The applicant should provide a status update of the proposed connection to Cambridge's municipal services.

#### 4. Technical Comments

- a. With respect to the Site Plans, we offer the following commentary:
  - i. The applicant should clarify if the provisions included under the heading "Development Standards" are standards that are being proposed for the Subject Lands, or if these are the required provisions for the industrial zone. If the latter, the provisions should be revised as they are currently incorrect. As an example, the site plan states that the maximum height is 40 m, meanwhile table 9.2 of the Puslinch Zoning By-law identifies that the maximum height in the industrial zone is 25 meters;
  - ii. The applicant should include a zoning matrix, identifying the Township Zoning By-law's applicable regulations, including General Provisions, and what is provided/ proposed by the proposal;
  - iii. Bicycle Parking and Accessible vehicle parking are required as per the Puslinch Zoning By-law, and should be included on the Site Plan(s). Section 5.2.14 of the Puslinch Zoning By-law outlines the minimum number of parking spaces that are required to be provided. In addition, section 5.2.15 of the Puslinch Zoning By-law provides the bicycle parking requirements for retail and industrial uses;
  - iv. For information, Section 4.15 of the Puslinch Zoning By-law includes provisions regarding lighting. As this stage of the development, the applicant should confirm that any lighting fixtures will be designed in accordance with

the provisions of the Puslinch Zoning By-law. A photometric plan will be required during Site Plan stage;

- v. The applicant appears to apply the parking requirement for “industrial use” (warehouse’s requirement is 1 per 200 m<sup>2</sup>) in Table 5.3 of the Puslinch Zoning By-law to calculate the parking requirement for all industrial uses in the proposal. The correct parking requirement for “business or professional office” is 1 per 40 m<sup>2</sup>. The proposal appears to provide more parking spaces than required based on this use combination. We note that there are uses under the Industrial Zone (I) that has higher parking requirements than the “industrial use” in Table 5.3;
- vi. The applicant should include the dimensions of the proposed loading spaces to demonstrate compliance with section 5.1.3 of the Puslinch Zoning By-law;
- vii. The proposed surface of the parking area should be identified on the site plan to demonstrate compliance with section 5.2.10 of the Puslinch Zoning By-law;
- viii. Conceptual Site Plan A identifies that 53 trailer stalls are proposed. This may be considered an outdoor storage area. The applicant should provide more information on the proposed trailer stalls, and confirm whether the trailers will be attached to tractors. In addition, the applicant should confirm if these trailers are being stored/parked for sale and/or repair;
- ix. The number of gas pumps and any accessory structures associated with the proposed gas bar should be included. Parking requirement for gas bar is 1 space per pump as per the Puslinch Zoning By-law;
- x. Concept B should identify the office use’s floor areas in Building 7 and Building 8 to confirm parking requirement;
- xi. All proposed buildings and structures and their setbacks to property lines should be included;
- xii. The width of the vehicular accesses should be included.
- xiii. The drive aisle widths appear to meet the Puslinch Zoning By-law’s minimum requirement. Please identify if there are instances where this regulation is not met; and
- xiv. The Legal description of the Subject Lands should be included;
- xv. All measurements need to be shown in metric.

- b. With respect to the Land Use Compatibility Study, we offer the following commentary:
- i. The Land Use Compatibility compares the proposed development with the recommended minimum separation distances as provided in the D-6 Guidelines. It is our understanding that these are the separation distances within which no incompatible development should occur even if additional mitigation for adverse impacts is provided. For the purpose of the Zoning By-law Amendment application, an assessment of the proposal's impacts based on the facility's operations/ processes and transport activities within the Influence Area or Potential Influence Areas as set out by the Ministry may be required. We defer to the Township's consultant to comment on the adequacy of this Study.
  - ii. The Study states that the portion of lands that are contemplated to contain the retail store and gas bar (in Concept A) are proposed to be zoned Highway Commercial (HC). Table 4.1 in the Study also examines uses that are permitted in the HC Zone. This is not consistent with the draft zoning by-law provided.
  - iii. The Land Use Compatibility Study recommends the zoning by-law to restrict the uses to only those that are classified as Class I or Class II in the study. The draft Zoning By-law provided seeks to permit gas bar, retail store and all uses that are permitted under the parent Industrial Zone (I). Some of these uses are identified as potential Class III in the Study. The draft zoning by-law needs to remove uses that could be classified as Class III or the Land Use Compatibility Study needs to provide recommendations for the zoning by-law to ensure the uses are Class I or Class II only.
  - iv. The Land Use Compatibility should also recommend minimum building setbacks from Class I and Class II uses to the relevant lot lines. These will have to be incorporated into the draft zoning by-law if they are more than the required setbacks for the Industrial Zone (I).
- c. The Planning Justification Report (PJR) should be signed by a Registered Professional Planner and be revised to address policy matters identified in Section 3 of this letter.
- d. With respect to the draft Zoning By-law, we offer the following comments:
- i. Under the Puslinch Zoning By-law, "Industrial Use, dry" are defined as no significant water or sewage requirements are necessary as part of the assembly, manufacturing, repair, packaging and storage activities. For the purposes of this definition, significant water requirements are defined as

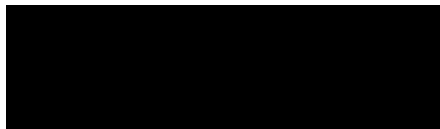
requiring a Permit to Take Water and/or greater than 50,000 liters of water per day. In regard to significant sewage disposal requirements, this is defined as systems that exceed 10,000 litres per day. The applicant should discuss if the proposed industrial uses comply with this definition.

- ii. The draft zoning by-law schedule identifies that two industrial site-specific zones are proposed ((IND(spXX) and (IND(spXXX)). The applicant should identify what the site-specific provisions are proposed for the IND(spXXX) Zone.
- e. With respect to the Traffic Impact Study, we offer the following commentary:
- i. The Site generated traffic for the proposed development assumed the uses for the various buildings on the site as follows: Buildings 1-3 – warehouse, Buildings 4-6 – industrial park and the big-box retail store to be either a discount store, a home improvement store, an electronic superstore or a home furnishing superstore. As the draft zoning by-law seeks to permit a wider range of uses, we will coordinate with the Township’s traffic consultant to determine if the site generated traffic assumptions in this study are adequate.
  - ii. The parking calculations for concept A should be revised to include the parking requirement for the proposed gas bar; and
  - iii. The parking calculations for both concepts should be revised to address the required parking for the proposed office uses.
- f. With respect to the Urban Design Brief, we offer the following commentary:
- i. The Urban Design references the Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe, both policy documents were replaced by the Provincial Planning Statement (2024). The brief should be revised to reference the right policy document.
  - ii. The Brief states that the Subject Lands are zoned Secondary Agricultural (A2), this is incorrect. The Subject Lands are zoned Agricultural (A).
  - iii. The Township’s Puslinch Design Guidelines (PDG) are applied to commercial and industrial development proposals throughout the Township. The Brief needs to address how relevant guidelines in PDG have been considered as part of the site design. Sections relevant to the proposed development may include: Section B1 – Commercial, Industrial and Institutional Uses; Section B2 – Corner Sites and Gateways; Section B3 – Pedestrians and Cyclists; Section B4 – Vehicles, Parking and Service Areas; Section B5 – Signs (if

applicable); Section C4 – Development near residential uses; and Section C5 – Site Landscaping.

- g. In accordance with policy 12.5.6 of the County Official plan, the required road width for local roads including Ellis Road is 20 meters. It appears that a road widening might have already been taken on the south side of Ellis Road, however a survey plan showing the measurement between the northerly lot line and the original centerline of Ellis is required to confirm if a road widening is required.
- h. The Stormwater Management Report indicates part of the site will drain into the adjacent neighbouring property to the east. We will coordinate with the Township's engineering consultant to determine if this is appropriate and whether there is any additional requirement to facilitate this, including an easement.
- i. Parkland dedication and Development Charges may be required in accordance with the prevailing Township's by-laws.
- j. The following information is available to assist with a submission:
  - i. Site Plan and Drawing Requirements:  
[https://puslinch.ca/wpcontent/uploads/2020/09/Site-Plan-and-Drawing\\_Guidelines.pdf](https://puslinch.ca/wpcontent/uploads/2020/09/Site-Plan-and-Drawing_Guidelines.pdf)
  - ii. Municipal Development Standards:  
[https://puslinch.ca/wpcontent/uploads/2022/07/117006-3-Puslinch-Standards\\_FINAL-September2019.pdf](https://puslinch.ca/wpcontent/uploads/2022/07/117006-3-Puslinch-Standards_FINAL-September2019.pdf)
  - iii. Puslinch Design Guidelines:  
<https://puslinch.ca/wpcontent/uploads/2022/07/Puslinch-Design-Guidelines-Feb-2010.pdf>

Sincerely,



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

December 2, 2025

GEI Project No. 2501655 – 125006-010

VIA CLOUDPERMIT: Township of Puslinch  
Township Application No. D14-CUL

Monika Farncombe  
Township of Puslinch  
7404 Wellington Road 34  
Puslinch, ON NOB 2J0

**Re: ZBA 1<sup>st</sup> Submission  
2781-2809 Townline Road  
Puslinch, ON**

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed first submission documents for a Zoning By-Law Amendment application in support of a proposed commercial development on the subject lands located at 2781-2809 Townline Road in the Township of Puslinch. The submission was received from the Township on November 20, 2025.

It is our understanding that the proposed development includes multiple buildings with associated parking and three driveway accesses from Townline Road. The lands are currently zoned agricultural and therefore a Zoning By-Law Amendment is required prior to site plan application.

The pre-consultation meeting was held on August 21, 2025.

## **1. Documents Received**

All plans and studies required from an engineering perspective have been submitted.

The following documents were received as part of this submission and will be reviewed by GEI at a later date:

- Plan of Survey (legal), prepared by J.D. Barnes, dated July 15, 2025.
- Plan of Survey (topographical), prepared by J.D. Barnes, dated July 15, 2025.
- Conceptual Site Plan, prepared by Ware Malcomb, dated August 5, 2025.
- Conceptual Site Plan A, prepared by Ware Malcomb, dated November 7, 2025.
- Conceptual Site Plan B, prepared by Ware Malcomb, dated November 7, 2025.

- Geotechnical Investigation, prepared by Soil Engineers, dated November 2025.
- Hydrogeological Assessment, prepared by Soil Engineers, dated November 13, 2025.
- Preliminary Grading Plan (Rev. 1), prepared by Husson Engineering Management, dated October 31, 2025.
- Preliminary Servicing Plan (Rev. 1), prepared by Husson Engineering Management, dated October 31, 2025.
- Functional Servicing and Stormwater Management Report, prepared by Husson Engineering Management, dated November 2025.
- Private Servicing Assessment, prepared by C.F. Crozier & Associates, dated November 10, 2025.

The following documents were also received as part of this submission and will be reviewed by Township staff and other consultants at a later date:

- Parcel Register, dated September 22, 2025.
- Natural Heritage Assessment, prepared by GeoProcess Research Associates, dated October 22, 2025.
- Planning Justification Report, prepared by Sajecki Planning, dated November 2025.
- Tree Inventory and Preservation Plan Report, prepared by Jackson Arboriculture, dated November 11, 2025.
- Conceptual Urban Design Brief, prepared by Ware Malcomb, dated November 11, 2025.
- Land Use Compatibility Study, prepared by GHD, dated November 13, 2025.
- Minimum Distance Separation Report, prepared by MHBC Planning, dated November 14, 2025.
- Traffic Impact Study, prepared by GHD, dated November 18, 2025.

## **2. Additional Documents Required**

All plans and studies required from an engineering perspective have been submitted and additional documents are not required. We are in support of the zoning bylaw application being deemed complete at this time.

Technical review of the submitted documents will be completed at a later date.

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

December 2, 2025

3625

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

Attention: Monika Farncombe  
Planning and Corporate Services Coordinator

**RE: 2781-2809 Townline Road, Puslinch, Proposed Zoning Bylaw  
Amendment and Industrial Development  
Peer Review of EIS & TPP, OPA & ZBA Application**

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As requested, we have reviewed the Official Plan Amendment (OPA) and Zoning Bylaw Amendment (ZBA) Application submitted to the Township of Puslinch (the "Township") on behalf of Fieldgate Properties Limited in support of the development of six industrial buildings, one retail store, and one gas station at 2781-2809 Townline Road, Township of Puslinch, Ontario ("subject property"). Specifically, NRSI staff have reviewed the Natural Heritage Assessment (NHA) prepared by GeoProcess Research Associates Inc. (GeoProcess) (dated October 2025) and supporting technical documents submitted in support of the proposed development. The submission package includes a Tree Inventory and Preservation Plan (TPP) (Jackson Arboriculture Inc., November 2025), Hydrogeological Assessment (Soil Engineers Ltd., November 2025), and the Functional Servicing and Stormwater Management Report and Grading Plan (Husson Engineering & Management, November 2025), among other reports and plans. Our comments are set out below.

**Background**

The subject property is located east of Townline Road, north of the Macdonald-Cartier Freeway, and south of Ellis Road in the Township of Puslinch, Ontario. NRSI staff previously reviewed and provided comments on a pre-consultation request and attended a pre-consultation meeting with the Township, review staff, and the applicant for the proposed development in August 2025. Staff have since reviewed the OPA and ZPA application materials.

**Reviewed Materials**

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

- Natural Heritage Assessment for 2809 Townline Road, Puslinch, Ontario. Prepared by GeoProcess Research Associates Inc. (October 22, 2025);
- Tree Inventory and Preservation Plan Report, 2809 Townline Road, Puslinch, ON. Prepared by Jackson Arboriculture Inc., (November 11, 2025);
- A Hydrogeological Assessment for Proposed Industrial and Commercial Development, 2809 Townline Road, Township of Puslinch. Prepared by Soil Engineers Ltd. (November 13, 2025);
- Functional Servicing and Stormwater Management Report, 2809 Townline Road, Township of Puslinch. Prepared by Husson Engineering & Management. (November 2025);

- Preliminary Grading Plan SW1, 2809 Townline Road, Puslinch, Ontario; prepared by Husson Engineering & Management, Project No. 251619. (November 12, 2025);
- County of Wellington Official Plan (last updated May 2025);
- “Make a Map: Natural Heritage Areas”, Ministry of Natural Resources (2025);
- Grand River Conservation Authority (GRCA) Regulation Mapping, Grand River Conservation Authority (2025); and,
- Natural Heritage Information Centre (NHIC) database (2025).

In addition to the materials identified above, NRSI staff also conducted a high-level review of the additional application materials provided to further understand potential impacts to existing natural heritage features within the subject property and adjacent lands. The review comments provided below are limited to ecological matters and primarily focused on the NHA and TPP.

### **Relevant Policy Framework**

Our review considered the adequacy of the proposed development and potential impacts on natural heritage features identified within the County of Wellington Natural Heritage System, or “Greenlands System”, and the Provincial Planning Statement (PPS) (2024). The lands surrounding the subject property contain regulated natural heritage features and Schedule B7 of the County of Wellington Official Plan (OP) (2025) identifies the presence of “Greenlands” and “Core Greenlands”. Additionally, our review evaluated the level to which the proposed development adheres to the requirements of the *Endangered Species Act* (ESA 2007) and the Township of Puslinch Comprehensive Zoning By-law No. 023-18 (2024). This analysis was undertaken to identify whether the NHA has sufficiently addressed relevant natural heritage policies, evaluated the potential direct and indirect impacts the proposed development may have on the existing natural features, and whether appropriate avoidance and mitigation measures have been considered.

## General Comments

GeoProcess has prepared a scoped NHA focused primarily on potential impacts to the adjacent Puslinch Lake–Irish Creek Provincially Significant Wetland (PSW) Complex, Species at Risk (SAR) bats, and a high-level characterization of development impacts. While the submission and approach to natural feature impact assessment appear generally consistent with the County of Wellington EIA guidelines and are reasonable given the limited on-site natural heritage features, the report does not document the desktop background screening that would typically support and justify this level of scoping. Instead, it appears that the NHA has been scoped based primarily on comments received through the pre-consultation process by NRSI staff (August 2025) and comments provided in an Ecological Constraints Reviews prepared by Aboud & Associates (September 2023).

Typically, the completion of an NHA would involve a comprehensive background review of the subject property and adjacent lands. The report does not specify whether a review of Official Plan schedules, Ministry of Natural Resources (MNR) or Natural Heritage Information Centre (NHIC) records, SAR and Significant Wildlife Habitat (SWH) screening, or relevant wildlife atlas data was completed and used to confirm the low likelihood of other significant features or species.

Despite this, NRSI staff generally agree that the potential for additional significant natural heritage features or significant species is very limited on the subject property, based on the information provided and available background information. However, explicit confirmation that a screening exercise was completed, even at a high level, would strengthen the rationale for the scoped NHA approach and conclusions.

The NHA describes the spatial relationship between the subject property and the Puslinch Lake–Irish Creek PSW Complex and concludes that direct impacts are unlikely due to separation by Ellis Road and distance to the PSW. Surface drainage is proposed to be collected, treated for quality and quantity, and discharged to the Ellis Road roadside ditch, ultimately draining toward downstream receivers. The Hydrogeological Assessment indicates buildings will be constructed above the shallow groundwater table and that construction dewatering and long-term foundation drainage are minimal, with no significant impacts anticipated to nearby natural features. NRSI staff generally agree with the conclusion that the proposed development is unlikely to result in negative impacts to the Puslinch Lake–Irish Creek PSW Complex, based on the information provided with respect to proposed grading, surface water dewatering, stormwater management, and hydrogeological controls.

The NHA notes the presence of inactive Barn Swallow (*Hirundo rustica*) nests within the on-site barn but does not discuss the implications of this habitat or provide recommendations for its management. As Barn Swallow is listed as a species of “Special Concern” in Ontario, nesting habitat in and on the barn is protected. Nests are specifically protected during the breeding period from May 1 to August 31. The NHA should acknowledge this status and prescribe that any removal of unoccupied nests or works that could damage nests or nesting substrate be completed outside of this period, with any future alteration or demolition of the barn undertaken in accordance with applicable habitat provisions.

Section 4.6.3 of the Wellington County Official Plan requires that Environmental Impact Assessments provide a statement that there will be no negative impacts on provincially significant Greenlands features and functions, and describe how negative environmental impacts will be mitigated in other Greenlands areas. In this case, the NHA conclusion includes discussion demonstrating that concerns related to the adjacent PSW and bat habitat have been

addressed; however, it does not explicitly frame these findings as a “no negative impact” conclusion for Greenlands features/functions. It is recommended that an addendum be prepared to address additional recommendations provided in this letter, as well as a clear statement and brief analysis confirming no negative impact on Greenlands features and functions, and summarizing the key mitigation measures that will be implemented to ensure policy conformity with Section 4.6.3 of the County OP.

### Recommendations

- Confirm and briefly document that a desktop background screening (OP schedules, MNRF/NHIC records, SAR/SWH screening, wildlife atlases) was completed to support the scoped NHA approach;
- Prepare an addendum that:
  - Clearly states no negative impact on Greenlands features/functions (incl. PSW) and summarizes key mitigation measures to meet OP Section 4.6.3; and
  - Acknowledges Barn Swallow habitat protection and prescribes that any removal of unoccupied nests or works affecting nests/nesting substrate occur outside May 1–August 31, with any barn alteration/demolition completed in accordance with applicable habitat provisions.
- Confirm that natural heritage mitigation measures (tree protection, timing windows, ESC, bat/bird measures) will be secured through Site Plan conditions and are consistent across the NHA, TPP, grading and servicing drawings.

### **Habitat for Endangered or Threatened Species (Species at Risk Bats)**

As described in the NHA, the field survey program investigated the potential for SAR bat habitat primarily through a snag survey and inspection of on-site structures. However, the surveys completed do not fully reflect the current Ministry of Environment, Conservation and Parks (MECP)\_guidance or the full suite of SAR bats known or potentially present in Ontario.

At the time of the habitat assessment survey, the three migratory bats (Eastern Red Bat (*Lasiurus borealis*), Hoary Bat (*Lasiurus cinereus*), and Silver-haired Bat (*Lasionycteris noctivagans*)) native to southern Ontario were listed as Endangered and their habitat is protected under the *Endangered Species Act* (ESA, 2007); however, the methods and discussion focus almost exclusively on Little Brown Myotis (*Myotis lucifugus*) and Northern Myotis (*Myotis septentrionalis*) and do not explicitly address these migratory species. Eastern Small-footed Myotis (*Myotis leibii*) also appears to have not been considered. In practice, all of the identified habitat trees should be treated as candidate roosting habitat for Eastern Red Bat and Hoary Bat, and Silver-haired Bat should be considered under the same snag criteria as Little Brown and Northern Myotis.

Although the subject property is unlikely to contain the rocky habitat preferred by Eastern Small-footed Myotis, this species can also use buildings for maternity roosting and should be acknowledged in the report for completeness. The report also references an older “MNR 2017” protocol; it should instead be explicitly grounded in current MECP guidance, including:

- Maternity Roost Surveys (Forests/Woodlands) (MECP 2022a); and,
- Species at Risk Bats Survey Note 2022 (MECP 2022b).

The NHA also identifies that bat habitat assessment surveys were completed on September 22, 2025, while the site remained in full leaf conditions, as evidenced by the field photos, and no

subsequent leaf-off assessment was undertaken. Current MECP guidance (MECP 2022a) requires that snag surveys for candidate maternity roost trees be completed under leaf-off conditions to adequately identify cavities, bark features, and other microhabitat attributes. As a result, the absence of a leaf-off survey does not technically meet MECP protocol requirements, and the full extent of potential maternity roost trees on the property may not have been captured. The report's conclusion that the subject property provides low overall bat maternity roosting function should therefore be explicitly qualified and supported by a clearer rationale that reflects these methodological limitations.

Notwithstanding these issues, NRSI staff generally agree that the removal of trees on the subject property is unlikely to impair or eliminate the broader habitat function for SAR bats, if removals occur outside of the bat active period and appropriate avoidance measures are implemented. This conclusion is supported by the small number of trees involved, their isolated nature, the lack of meaningful connective function to off-site habitats, and the proximity of more extensive and higher-quality forest and riparian habitats to the north and south (including along the nearby watercourse corridor). To align with MECP guidance (2022b) and to account for potential Eastern Small-footed Myotis habitat, we recommend that no removal of trees or woody shrubs 1m tall or greater occur between March 15 and November 30, and that any required vegetation removals be restricted to the December 1–March 14 window. If removals cannot be confined to this period, the proponent should follow MECP's avoidance and mitigation measures (MECP 2022b), including pre-clearing inspections and contingency protocols, and ensure that any future surveys or refinements to the bat assessment explicitly consider all SAR bats with potential to occur in the area.

### Recommendations

- Treat all identified habitat trees as candidate maternity/roosting habitat for migratory SAR bats;
- Address the methodological gap by either completing a leaf-off snag survey (per MECP 2022a) or clearly qualifying the "low bat maternity function" conclusion with rationale that recognizes the lack of leaf-off assessment; and,
- Prescribe a timing window where no removal of trees or woody shrubs >1m tall occurs between March 15 and November 30, restricting vegetation removal to December 1 – March 14, or, where this is not feasible, apply MECP 2022b avoidance/mitigation (pre-clearing inspections, contingency measures).

### **Tree Preservation Plan**

A Tree Preservation Plan (November 11, 2025) was prepared by Jackson Arboriculture Inc. NRSI staff provide the following comments:

- Several trees proposed for retention with Tree Protection Fencing (TPF) appear to have grading or other impacts within their minimum Tree Protection Zone (TPZ), including Trees 7, 19, 20, 24, in addition to those flagged in the TPP Note (Trees 32–43, 48–57, 73, 167);
  - Confirmation should be provided as to whether these trees can reasonably be retained given the extent of encroachment, or whether removal and compensation is more appropriate.

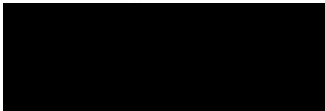
- Many of the affected trees along Townline Road appear to be within the Township right-of-way and include non-native invasive species (e.g., Norway Maple (*Acer platanoides*)) or non-native cultivars (e.g., Honey Locust (*Gleditsia triacanthos*));
- Township permission will be required for any injury/removal of right-of-way (ROW) trees, as identified in the TPP, and given the likely grading impacts it may be preferable to remove these trees and replace them with native species within the western landscape/dry service buffer where there is available planting space;
- Based on the grading plan, Trees 150, 151, 154, 169, 175, 178, and 186 also appear to have grading overlapping their root zones/TPZ but are not clearly identified as impacted in the TPP;
  - Impacts to Tree 154 appear substantial, and its realistic potential for retention should be confirmed.
- Tree 154 is also a boundary tree, and any injury or removal will require written consent from the shared owner under the *Forestry Act*, R.S.O. 1990. This should be explicitly noted in the TPP and the required permissions obtained prior to any tree removal or site alteration affecting this tree;
- The TPP does not appear to address the proposed drainage channel in the northwest corner of the site, where impacts to on-site and potential off-site/ROW trees (e.g., Trees 68 and 69) are anticipated. An updated TPP should be prepared at detailed design based on final grading and full construction limits to ensure all affected trees in this area are properly assessed.
- No tree compensation strategy has been provided for the removal of 22 trees. It is recommended that compensation be provided at a minimum 2:1 ratio using native tree species tolerant of urban conditions, integrated into the landscape plan.
- Tree protection fencing alignments are generally appropriate. However, the prescribed orange snow-fence will not effectively mitigate potential grading, erosion, and sedimentation impacts. This should be replaced or combined with erosion and sediment control fencing along downgradient limits, installed prior to and maintained throughout construction.

## Conclusion

Based on our review of the submitted NHA, TPP, and supporting materials, we consider the application complete from a natural heritage and ecology perspective. However, the additional clarifications and updates identified in this letter should be addressed through conditions of approval and prior to any site alteration or tree removal, to ensure that natural heritage policies are satisfied and that appropriate mitigation and compliance measures are fully implemented.

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

Sincerely,  
Natural Resource Solutions Inc.



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



Sydney Gilmour, M.Sc.  
Terrestrial and Wetland Biologist

Project: 2501.08 (Township File: D00-CUL)

December 5, 2025

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

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

**RE:** Hydrogeological Comments for Zoning By-Law Amendment Application –  
Submission 1  
2781-2809 Townline Road, Puslinch, Ontario

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

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

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

- A large format retail store;
  - A gas station;
  - Six industrial buildings totaling 94,358 m<sup>2</sup>;
  - An alternative development scenario proposing two additional industrial buildings in place of the retail store and gas bar, providing a total building area of 118,287 m<sup>2</sup>.
- Municipal servicing is not available within the Township of Puslinch on the east side of Townline Road. As such, all rural properties in the area are serviced by private water supply wells and septic systems. The urban residential properties on the west side of Townline Road are part of the City of Cambridge and receive municipal water and sewer servicing.

## Documents Reviewed

WHL reviewed and cross-referenced the following documents in preparation of these hydrogeological comments:

1. Soil Engineers Ltd. (SoilEng). 2025a. A Hydrogeological Assessment for Proposed Industrial and Commercial Development, 2809 Townline Road, Township of Puslinch. Reference No. 2507-W060, dated November 13, 2025.
2. Soil Engineers Ltd. (SoilEng). 2025b. A Preliminary Geotechnical Investigation for Proposed Commercial/Industrial Development, 2809 Townline Road, Township of Puslinch. Reference No. 2507-S060, dated November 13, 2025.
3. C.F. Crozier & Associates Inc. (Crozier). 2025. Private Servicing Assessment. Project No. 2996-7616, dated November 10, 2025.
4. Husson Limited (Husson). 2025. Functional Servicing and Stormwater Management Report, 2809 Townline Road, Township of Puslinch. Project: 251619, dated November 2025.
5. GeoProcess Research Associates Inc. (GeoProcess). 2025. Natural Heritage Assessment, 2809 Townline Rd, Puslinch. Project No. P2025-1046, dated October 22, 2025.

## Determination of Completeness

From a hydrogeological perspective the current application is incomplete. Additional supporting information and materials are required to deem the application complete.

## Requirements for Application Review

### 1. Public Water Servicing

Husson (2025) identified that the proposed big box store development requires municipal servicing, with connection to an existing 450 mm diameter watermain along Jamieson Parkway. The existing watermain is located within the City of Cambridge and not within the Township of Puslinch. WHL notes that municipal servicing is currently unavailable within the Township. The proponent must confirm water servicing plans as part of the ZBA submission to enable a complete hydrogeological review.

### 2. Private Water Supply

If the site is to be privately serviced, the proponent must demonstrate that sufficient groundwater supply is available to meet development demands. The water supply assessment must include drilling of test wells and pumping tests to confirm adequate water quantity and potable water quality in accordance with MECP Guideline D-5-5. A Permit to Take Water (PTTW) is required for water takings exceeding 50,000 L/day, which is anticipated for this development, and may involve additional requirements to demonstrate supply adequacy.

**Note:** The site is underlain by the Guelph Formation and the Goat Island/Gasport Formation aquifer, separated by a regional aquitard. Multiaquifer wells connecting these units are not permitted. Supply wells must be constructed either in the upper bedrock aquifer or cased appropriately into the lower bedrock aquifer, in accordance with R.R.O. 1990, Reg. 903: Wells, to minimize inter-aquifer groundwater movement.

### 3. Well Survey and Impact Assessment

A door-to-door well survey is required within 500 m of the site, including voluntary participation in a baseline groundwater level and quality monitoring program. The project hydrogeologist must complete an impact assessment to evaluate potential water quantity or quality impacts to nearby users. The assessment must include discussion of local hydrostratigraphy, aquifers supplying groundwater, and aquitards protecting those aquifers. Additionally, the impact assessment must ensure no adverse impacts to surrounding natural features.

#### **4. Shallow Groundwater Flow**

The project hydrogeologist must determine the direction of shallow groundwater flow to support the hydrogeological assessment and the Environmental Compliance Approval (ECA) application for the proposed onsite sewage system. With estimated sewage design flows between 130,500 L/day (Concept Plan A) and 190,000 L/day (Concept Plan B) (Crozier, 2025), evaluation under MECP Procedure B-7-1 is required for the evaluation of the large subsurface sewage disposal system. The preliminary hydrogeological report was unable to establish shallow groundwater flow direction, as groundwater was encountered in only one monitoring well. Additional wells may be required at sufficient depth to intercept the shallow groundwater system receiving sewage effluent.

#### **5. Shallow Groundwater Quality**

Baseline groundwater quality sampling must be completed in a minimum of two wells, with samples submitted to an accredited laboratory for analysis of general chemistry, metals, and nutrients.

#### **6. Shallow Groundwater Table Fluctuations**

Groundwater level monitoring must continue for a minimum of one year, using either monthly manual measurements or a combination of continuous datalogger monitoring supplemented with manual checks. *(Not required for ZBA; required at site plan stage.)*

#### **7. Water Balance**

A monthly water balance assessment is required, including pre-development, post-development (without mitigation), and post-development (with mitigation) scenarios. The proposed design must incorporate Low Impact Development (LID) measures to maximize infiltration of clean runoff and maintain the pre-development infiltration regime. Runoff infiltration from parking areas where deicing salt is applied is not recommended. *(Not required for ZBA; required at site plan stage.)*

#### **8. Soil Infiltration Tests**

Soil infiltration testing must be completed using a Guelph Permeameter (or equivalent), in accordance with the 2012 TRCA Stormwater Management Criteria. Testing must be conducted at appropriate locations and elevations based on proposed infiltration gallery placement. *(Not required for ZBA; required at detailed design stage.)*

## 9. Excess Soil

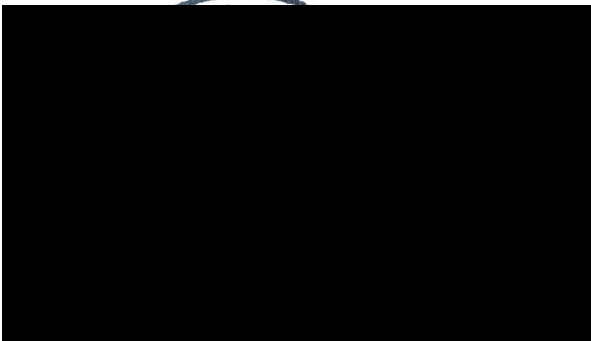
All import/export of fill or soil from the site must comply with O. Reg. 406/19: On-Site and Excess Soil Management, the Rules for Soil Management and Excess Soil Quality Standards (Soil Rules), and O. Reg. 153/04, as amended.

## Closure

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

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

### WELLINGTON HYDROGEOLOGY LTD.



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

Senior Hydrogeologist and CEO

Cell: 519-831-9696

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



**SALVINI**  
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December 9, 2025

Monika Farncombe  
Planning and Corporate Services Coordinator  
Township of Puslinch  
7404 Wellington Road 34  
Puslinch, ON · N0B 2J0

**Re: 2781-2809 Townline Road  
Transportation Impact Study (TIS), November 2025  
Deem Application Complete, ZBA 1<sup>st</sup> Submission  
Township Peer Review Comments**

Dear Monika,

I've begun reviewing the November 2025 TIS prepared by GHD (GHD TIS) for the site noted above as requested for the purposes of assisting in determining if the application is complete. The site is the subject of planning applications for the development of industrial and commercial uses. The GHD TIS was undertaken for two different site concepts that explore the use of the southern portion of the site for either retail or industrial uses.

The site was the subject of a Pre-Study Conference in October of 2025 set up by the Region of Waterloo. Transportation stakeholders from the Township and the Region attended along with representatives from the County of Wellington, the MTO and GHD. The City of Cambridge was invited, but was unable to attend. At the meeting, the scope of the study was discussed and the parameters for the study were reviewed. I did not receive an updated Terms of Reference or a filled in Pre-Study Conference Form from the applicant's consultant or confirmation from the various transportation stakeholders that they were in agreement with the Terms of Reference. In addition, there are a number of items discussed in the meeting that are not addressed in the study. The following are some key items not addressed up to now.

1. Both the Region of Waterloo and the MTO indicated that they would not support maintaining the existing driveway connection to Townline Road south of Jamieson Parkway from the site. The Region asked that the concept be revised to include no more than two driveway connections to Townline Road. MTO provided correspondence to the applicant's consultant that they would review a revised Terms of Reference that reflects a redesign of the proposed development to meet their Highway Access Management policies and to address the concerns outlined in previous correspondence. Both

concepts included in the study include the existing southerly driveway and MTO has not yet provided comments on the Terms of Reference to confirm the scope.

2. There is a background development southwest of the site that was identified to include in the study that was not included. If the applicant's consultant is not able to get the information needed from the City of Cambridge, perhaps we can assist.
3. An approved Terms of Reference from the various transportation stakeholders would provide guidance on background growth rates. Without this document, I'm not able to confirm that the rates that were used throughout the study area are supported by the MTO, the Region of Waterloo and the City of Cambridge.

To address the Township's review process, I provide the following:

1. The application is not complete because the TIS does not address an agreed to Terms of Reference and does not address some comments provided in the Pre-Study Conference.
2. In order for the application to be deemed complete, the Terms of Reference for the TIS should be confirmed with all of the transportation stakeholders and then the study should be updated to address the scope.

Please let me know if you have any further questions about my review of the subject application.

Sincerely,



Julia Salvin, MEng, PEng, FITE  
President

Cc: Mike Fowler, Township of Puslinch  
Justine Brotherston, Township of Puslinch

