

2nd Submission Comment Summary – 2871-2809 Townline Rd – D14-CUL

Consultant	Comments
Township Traffic Consultant – Salvini Consulting	See attached letter
Township Noise Consultant – Valcoustics	See attached letter
Source Water	1. Sufficient information has been provided, the application can be deemed complete.
Township Building Department	<p>For the purposes of OPA/ZBA, the building department considers the application complete.</p> <p>Should this project move to the site plan application stage, provide the following at the time of application:</p> <ol style="list-style-type: none"> 1. Conceptual elevations and floor plans for each building. 2. Preliminary spatial separation calculations 3. Demonstrate how an adequate water supply for fire-fighting purposes can be met if water can not be connected to the Cambridge watermain. 4. Preliminary OBC matrix for each individual building 5. Show any proposed fire hydrant and Siamese connection locations. 6. MECP approval for proposed septic systems. 7. Show designated fire routes on the site plan. 8. Confirm if roof drainage flow control will be used as part of the stormwater management.
Township Hydrogeologist – Wellington Hydrogeology	See attached letter



SALVINI
CONSULTING
Transportation Engineering and Planning

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February 26, 2026

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), February 2026
Deem Application Complete, ZBA 1st Submission
Township Peer Review Comments**

Dear Monika,

I've begun reviewing the February 2026 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.

Since I last provided comments on this application, a completed pre-study conference form (Region of Waterloo template) and related terms of reference for the GHD TIS has been agreed to by the various transportation stakeholders and provincial legislation has changed so that a TIS completed by and stamped by a Professional Engineer is deemed complete. The submitted GHD TIS has been stamped by a Professional Engineer and is deemed complete.

My initial high level review of the updated GHD TIS finds that the access along Townline Road has been revised to remove the proposed driveway closest to the highway interchange and to consolidate access to the site at two driveways to Townline Road. In addition, the study includes for the development southwest of the site as background traffic as I had requested.

I will provide a more fulsome review of the GHD TIS and comments on the study at a later date.

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

1. The application is complete.
2. n/a

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

Sincerely,



Julia Salvini, MEng, PEng, FITE
President

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



March 10, 2026

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

Attention: Monika Farncombe
mfarncombe@puslinch.ca

VIA E-MAIL

**Re: Peer Review of Preliminary Noise Study
 2809 Townline Road
 Puslinch, Ontario
 VCL File: 123-0460**

Dear Ms. Farncombe:

We have completed our review of "Preliminary Noise Study, 2809 Townline Road, Twp of Puslinch ON", dated February 3, 2026, prepared by Thornton Tomasetti (TT).

Our comments are outlined herein.

- a) The noise study has appropriately applied the Ministry of Environment, Conservation and Parks (MECP) noise guidelines. The noise sensitive receptors are deemed to be in a Class 1 area due to their proximity to Highway 401. This is considered appropriate.

- b) There are a few items that require some additional clarification before we can agree with the findings and recommendations of the preliminary noise study:
 - a. Ambient sound levels, which have been used as the guideline limit, are provided in Table 2 and in Appendix E. It is not clear if the existing sound barriers have been taken into account in calculating the ambient sound levels. Since the existing sound barriers will reduce the ambient and applicable guideline limits, the sound barrier must be accounted for in the assessment.

 - b. The ambient calculations appear to have been done on the rear (east facing) facades of the dwellings. This likely is not the worst-case location. It is likely that the north-facing facades receive similar worst-case noise levels but a lower ambient sound level/guideline limit. Additional assessment is requested.

 - c. Some of the reference sound levels in Table 3 are very low and much lower than we have seen TT use in the past. Of particular concern are the truck pass-by, truck coupling and trailer loading reference sound levels.

- d. We are concerned about the assumed average speed of 40 km/hr when trucks are operating on site. Using too high of a speed results in less time on site and reduced off-site sound levels.
- e. NPC-300 requires a predictable worst-case noise assessment. Assuming impulses are distributed across the entire site does not reflect a predictable worst-case scenario.
- f. The truck source heights (1.2 m for truck coupling and 1.75 m for truck movements) are lower than what is typically used. What source height has been used for the reefers?
- g. Assessment results that include the reefers are not included in Appendix E.
- h. Why have idling trucks been modelled as a line source?

Based on our review of the preliminary noise study, there are a few items, as outlined above, that require further clarification before we can agree with the findings and conclusions of the noise study.

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

Yours truly,

VALCOUSTICS CANADA LTD.

Per:



John Emeljanow, P.Eng.

JEV
2026-03-10 Peer Review V1.0.docx

Project: 2501.08 (Township File: D00-CUL)

March 8, 2025

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

Attention: Monika Farncombe
Development and Legislative Coordinator

RE: Hydrogeological Comments for Zoning By-Law Amendment Application –
Submission 2
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).

Comments provided herein are based on materials reviewed to date, including the February 2026 second submission. WHL previously provided comments on the initial submission on December 5, 2025.

Documents Reviewed

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

First Submission Materials Reviewed

1. Soil Engineers Ltd. (SEL). 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. (SEL). 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.

Second Submission Materials Reviewed

6. C.F. Crozier & Associates Inc. (Crozier). 2026. Re: Hydrogeological Comment #2 for Zoning By-Law Amendment Application, 2781-2809 Townline Road, Puslinch, Ontario. Project No. 2996-7616, dated January 27, 2026.
7. Soil Engineers Ltd. (SEL). 2026. Re: Response to Comments, Proposed Commercial/Industrial Development, 2809 Townline Road, Township of Puslinch. Reference No. 2507-W060, dated February 9, 2026.
8. Townline Gateway Holdings Ltd. 2026. Response to Wellington Hydrogeology Comments Letter, Project 2501.08 (Township File: D00-CUL), dated December 5, 2025. Dated February 9, 2026.

Determination of Completeness

From a hydrogeological perspective, the current submission is considered complete based on the comments provided herein. This determination assumes that the development will either (i) be serviced by municipal water through a servicing agreement with the City of Cambridge, or (ii) require a Permit to Take Water (PTTW) and an Environmental Compliance Approval (ECA) from the Ministry of the Environment, Conservation and Parks (MECP), which will involve a full technical review by the MECP.

Technical Comments

1. Public Water Servicing

Comment (WHL, December 2025): 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.

Response (Townline Gateway Holdings Ltd., February 2026): Both municipal and private water supply are feasible for this site. Municipal servicing is being actively reviewed with the City of Cambridge. However, should municipal water servicing not be attained through the existing watermain, the site can be serviced by private water supply as outlined within the Crozier Private Servicing Assessment dated November 10, 2025. From a hydrogeological perspective, the most demanding private water servicing would be the subject of review. Husson would be the EoR should municipal water be attainable, and Crozier would be the EoR should private water servicing be required. Further detailed design of the development will continue as part of Site Plan Application once the water supply source is determined.

Comment (WHL, March 2026): Acknowledged.

2. Private Water Supply

Comment (WHL, December 2025): 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 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.

Response (Crozier, January 2026): C.F. Crozier & Associates Inc. (Crozier) agrees that a water supply assessment including the installation of a test well and a subsequent pumping test should be undertaken to determine well yield, establish a recommended pumping rate and assess water quality, consistent with the principles of MECP Guideline D-5-5. However, it is Crozier’s opinion that this testing can be completed to support the future Site Plan Application for the proposed development.

The assessment completed to date demonstrates that the development can be functionally serviced with a water supply well to satisfy the Zoning By-Law Amendment application requirements. Crozier’s Private Servicing Assessment (November 10, 2025) included an estimation of water demand (36.2 or 52.76 litres per minute [LPM] for Concept Plan A and B, respectively), a review of the well-established hydrostratigraphy of the area, and an assessment of the water well records to determine the feasibility of servicing the proposed development with a water supply well. As stated in the assessment, the pumping rates for surrounding wells installed after 1990 are up to 95.6 LPM. MECP Well A102276 is located approximately 400 m east of the Site and was installed in 2011 to a depth of approximately 43 mbgs into limestone.

According to the well record (enclosed), the well yield was 90.9 LPM and the recommended pumping rate was 72.7 LPM. Similar rates were observed for other surrounding bedrock water supply wells (e.g., Wells 6714586 and 6706160). Higher pumping rates were observed with deeper wells installed greater than 50 mbgs (e.g., Wells 6506945 and 67103934). This demonstrates that bedrock wells in the area have well yields that meet the demand of the proposed development.

Based on the foregoing, it is Crozier’s opinion that the assessment completed to date demonstrates that the proposed development can be functionally serviced with a water supply well and therefore review of the Zoning By-law Amendment application can proceed. Once the Site Plan is further refined, a water supply assessment will be conducted to support the Site Plan Application, which will include the installation of test well(s), completion of pumping test(s), and collection of water quality samples for the Township’s review.

Comment (WHL, March 2026): While the preliminary servicing assessment suggests potentially adequate groundwater yields in the area, site-specific testing at or above the proposed maximum pumping rates (90.6 L/min for Concept A; 131.9 L/min for Concept B, per Crozier, 2025) is required to support the review. Such testing will confirm the adequacy of supply and allow evaluation of potential impacts on existing groundwater users in the surrounding area (see response to Comment 3 regarding the well survey and impact assessment). However, since a PTTW will be required, WHL agrees that the pumping test may be deferred until the site plan stage, at which time the PTTW application will be required. The PTTW application will be subject to detailed technical review by the MECP. Refer also to Comment #10 herein regarding MECP applications.

3. Well Survey and Impact Assessment

Comment (WHL, December 2025): 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.

Response (SEL, February 2026): Considering the proposed development is in preliminary phase, no schedule for construction is available the Subject Site. Due to changes anticipated on the status of the nearby water supply wells, SEL recommends to conduct the Water Supply Well Survey and Impact Assessment 6 to 8 weeks prior to commencement of construction activities within the Subject Site. The Well Survey should be conducted at all voluntarily participating water supply wells prior to construction, during construction activities, and following the completion of construction activities within the Subject Site.

Comment (WHL, March 2026): Due to the proposed on-site water supply from private well(s), a well survey and groundwater impact assessment are required to support hydrogeological review. These components should be completed alongside the pumping test to assess potential impacts of the proposed water takings on existing groundwater users in the surrounding area. However, as a PTTW will be required, WHL agrees that the well survey may be deferred to the site plan stage and incorporated into the pumping test

and PTTW application. The PTTW application and supporting report will undergo detailed technical review by the MECP. Refer also to Comment #10 regarding MECP applications.

4. Shallow Groundwater Flow

Comment (WHL, December 2025): The project hydrogeologist must determine the direction of shallow groundwater flow to support the hydrogeological assessment and the 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.

Response (SEL, February 2026): SEL will conduct additional groundwater level monitoring during Spring 2026 season to confirm that the groundwater level within the existing monitoring wells during the seasonal high shallow groundwater table, considering the groundwater level monitoring program was completed during August and September 2025. If shallow groundwater is not contacted during Spring 2026, SEL proposes to install additional monitoring wells at deeper elevations to determine the groundwater table elevation within the Subject Site.

Comment (WHL, March 2026): Acknowledged.

5. Shallow Groundwater Quality

Comment (WHL, December 2025): 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.

Response (SEL, February 2026): SEL will conduct groundwater quality sampling at monitoring wells, during the seasonal high shallow groundwater table monitoring program in Spring 2026. If not attainable, SEL will conduct groundwater quality sampling in the deeper monitoring wells, if needed, as noted above.

Comment (WHL, March 2026): Acknowledged.

6. Shallow Groundwater Table Fluctuations

Comment (WHL, December 2025): 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.)*

Response (SEL, February 2026): Noted.

7. Water Balance

Comment (WHL, December 2025): 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.)*

Response (SEL, February 2026): Noted.

8. Soil Infiltration Tests

Comment (WHL, December 2025): 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.)*

Response (SEL, February 2026): Noted.

9. Excess Soil

Comment (WHL, December 2025): 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.

10. MECP Applications

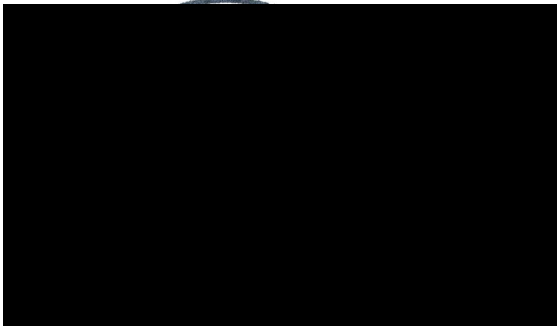
Comment (WHL, March 2026): The proposed development is anticipated to require an ECA and a PTTW from the MECP. The proponent should copy the Township Clerk on all submissions to the MECP to ensure the Township has the opportunity to review and provide comments.

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.



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