

D14-CUL 2781-2809 Townline Rd – 1st Technical Review

Consultant	Comments
NPG Planning – Township Planner	See attached letter
GEI – Township Engineer	See attached letter
Wellington Hydrogeology- Township Hydrogeologist	See attached letter
NRSI – Township Ecologist	See attached letter
Salvini Consulting – Township Traffic Consultant	See attached letter
Source Water	<p>A Section 59 Notice to deem the application complete was provided on November 25, 2025. At this time, Source Water has no comments regarding the ZBA application. Comments pertaining to the required Risk Management Plan and Source Protection requirements will be provided during future planning applications.</p> <p>If you have any questions, please reach out.</p>
Township Building Department	<p>For the purposes of OPA/ZBA, the building department no concerns.</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. Show locations of on-site fire water storage, hydrants and include calculations and assumptions. 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.
GRCA	Pending
Valcoustics – Township Noise Consultant	See attached letter



May 25th, 2026

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

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 2,354 vehicle parking spaces, 175 loading spaces, and 178 bicycle parking 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 1,240 vehicle parking spaces, 237 loading spaces, and 240 bicycle parking 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 technical review of the Zoning By-law Amendment application. As part of this submission, NPG has reviewed the following documents:

- Cover Letter prepared by Field Gate Properties Limited, dated February 19, 2026;
- Hydrogeological Comment #2 for Zoning By-law Amendment Application Letter prepared by Crozier, dated January 27, 2026;
- Land Use Compatibility Study prepared by GHD, dated February 17, 2026;
- Natural Heritage Assessment prepared by GeoProcess, dated February 2, 2026;
- Preliminary Noise Study prepared by Thorton Tomasetti, dated February 3, 2026;
- Peer Review Response to Preliminary Noise Study prepared by Thornton Tomasetti, dated March 26, 2026;
- Planning Justification Report prepared by Sajecki Planning, dated February 2026;
- Preliminary Grading Plan prepared by Husson Engineering + Management, dated October 31, 2025;
- Preliminary Servicing Plan prepared by Husson Engineering + Management, dated October 31, 2025;
- Response to Wellington Hydrology Comments Letter prepared by Townline Gateway Holdings Ltd., dated February 9, 2026;
- Response to Comments Letter prepared by Soil Engineers Ltd., dated February 9, 2026;
- Site Plan A prepared by Ware Malcomb, dated February 10, 2026;
- Site Plan B prepared by Ware Malcomb, dated February January 28, 2026;
- Wellington Source Water Protection Contact & Proposal Information dated February 5, 2026;
- Sketch showing road widths of Ellis Road, prepared by J.D Barnes Limited, dated January 12, 2026;
- Tree Inventory and Preservation Plan Report prepared by Jackson Arboriculture Inc., dated February 6, 2026;
- Traffic Impact Study prepared by GHD, dated February 18, 2026; and
- Conceptual Urban Design Brief prepared by Ware Malcomb, dated January 27, 2026.

1. Application Support:

- a. At the moment, we are not prepared to recommend support for the application.

2. Additional Requirements:

- b. From a planning's perspective, we require the applicant to address the below comments to the satisfaction of the Township before we could support the application.

3. Technical Comments:

- a. With respect to the Land Use Compatibility Study, we offer the following comments:
 - i. Table 4.1 provides an overview of the permitted uses in the draft zoning by-law. The LUC Study has recommended that uses on the Subject Lands be restricted to Class I and II industries. However, uses such as transport terminal and warehouse may possibly be considered Class III. Could the Study speak to the scale and or frequency of the truck movements and operating hours that would qualify these uses as Class III? More information regarding the facility's operations/ processes and transport activities may be required to justify these uses on the Subject Lands.
 - ii. It is noted that GHD recommends that open industrial processes and outdoor storage of raw materials/finished products be prohibited. The draft zoning by-law should be updated to align with the recommendations of the Study.
 - iii. Schedule "B" of the Draft Zoning By-law appears to implement the minimum setback distances recommended in the Land Use Compatibility. If these recommendations are updated as the Study continues to be refined through the development review process, the Schedule "B" may need to be updated accordingly.
- b. A Preliminary Noise Study was prepared by Thornton Tomasetti and submitted as part of this submission. We offer the following comments:
 - i. The Study described the planned development as consisting of industrial buildings. However, it is unclear if the noise impact assessment would vary based on the specific industrial uses being permitted on the site. Please provide a list of specific industrial uses for which the Study's conclusions are valid.
 - ii. We defer to the Township's noise consultant to review the methodology and conclusion of this study. If there are recommendations arising from this Study that are supported by the Township's noise consultant, they should be incorporated into the implementing Zoning By-law as appropriate. Alternatively, if recommended for approval, we may recommend a Holding

Provision requiring Site Plan Control approval for the site to ensure noise mitigation measures are implemented.

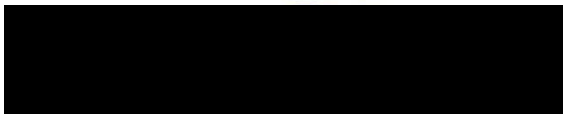
- c. The cover letter enclosed in this submission notes that an Agricultural Impact Assessment Report has been prepared. However, this report has not been provided for this submission. We request for a copy of this report in the subsequent submission.
- d. With respect to the Planning Justification Report (PJR), we offer the following comments:
 - i. The applicant should discuss how the proposed development is consistent with Provincial Planning Statement (2024) and the County of Wellington Official Plan (County OP), including the definition of “Employment Areas”. The Planning Justification Report should identify the primary employment use on the Subject Lands and demonstrate how the proposed commercial uses are ancillary/associated with the primary employment use for Concept A.
 - ii. The PJR noted that the retail store as shown on Concept A operates within a warehouse. Please clearly show on the Site Plan for Concept A the footprint of the warehouse component and the retail component. Policy 6.8.2 of the County OP permits limited accessory retail sale of products produced on site while Policy 9.8.3 a) of the County OP permits limited retail within areas designated Rural Employment in Puslinch. We have concern with the maximum floor area proposed for the retail use in the draft Zoning By-law to be considered limited and accessory.
 - iii. The applicant should evaluate the permitted uses being sought through the Zoning By-law Amendment application against the relevant policies of the PPS and the County OP, specifically with respect to the range and scale of commercial uses. We encourage the draft Zoning By-law to be as tailored as possible to reflect the proposed development and what is being assessed in the supporting studies.
 - iv. As previously requested, the applicant needs to address policy 11.2.6 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.
 - v. We will continue to review the latest proposal for consistency with the PPS and conformity with the County OP. We understand that an Official Plan Amendment (OPA) application has also been submitted to the County of

Wellington. We will provide comments for the OPA application once it is circulated to the Township.

- vi. The Puslinch Zoning By-law provides a definition for “dry industrial uses” as uses which do not require significant water and sewage disposal requirements. The Private Servicing Assessment dated November 10, 2025 provided an estimated water and sewage disposal for the industrial use component to be 25,650 L per day and 35,190 L per day, for concepts A and B respectively. The Puslinch Zoning By-law considers sewage disposal system associated with the industrial activities that exceeds 10,000 L per day as significant. Please advise on how this will be addressed in the Zoning By-law Amendment application. Additionally, please consider updating the analysis of how the proposed uses do not produce significant amounts of effluent as per Section 6.8.1.
- e. With respect to the Urban Design Brief, we offer the following comments:
 - i. The applicant should provide further justification demonstrating how the proposed development has been designed to achieve highway visibility and to give prominence to the location and a sense of prestige. In both concepts, buildings are located away from Highway 401 with parking areas between the buildings and the highway, which appear to undermine this objective; and
 - ii. As the parking and service areas are proposed to be screened from Highway 401 by landscaping, the Design Brief should provide a recommendation of minimum landscape buffer width to achieve effective screening.
 - f. The sketch showing road widths of Ellis Road provided by the applicant demonstrates that the measurement between the northerly lot line and the centerline of Ellis Road is 10.06 m. As such, a road widening is not required for the Subject Lands.
 - g. While the proposed development appears to provide adequate parking, the parking requirements as concluded in the Traffic Impact Study should be consistent with the zoning matrix's. Please coordinate the parking requirements and provision between this Study and the zoning matrix across both concepts as necessary.
 - h. Parkland dedication and Development Charges may be required in accordance with the prevailing Township's by-laws.
 - i. 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
- ii. Municipal Development Standards:
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,



Jeremy Tran, MCIP, RPP
Manager, Urban Design & Development Planning
NPG Planning Solutions Inc.
Jtran@npgsolutions.ca

May 25, 2026

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 1st 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 the proposed development on the subject lands located at 2781-2809 Townline Road in the Township of Puslinch. The first submission was received for technical review on May 7, 2026.

It is our understanding that the proposed development includes multiple buildings with associated parking and two 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. The first Zoning By-Law Amendment application was deemed complete as outlined in our review letter dated December 2, 2025.

1. Documents Received

The following documents were received and reviewed as part of this submission:

- Cover Letter, prepared by Fieldgate Properties, dated February 19, 2026.
- 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.
- Sketch Showing Road Widths of Ellis Road, prepared by J.D. Barnes, dated January 12, 2026.
- Conceptual Site Plan A, prepared by Ware Malcomb, dated February 10, 2026.
- Conceptual Site Plan B, prepared by Ware Malcomb, dated January 28, 2026.

- Geotechnical Investigation, prepared by Soil Engineers, dated November 2025.
- Hydrogeological Assessment, prepared by Soil Engineers, dated November 13, 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.
- 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.

We defer detailed review of the following documents to Township staff and other consultants:

- Parcel Register, dated September 22, 2025.
- Conceptual Urban Design Brief, prepared by Ware Malcomb, dated January 27, 2026.
- Planning Justification Report, prepared by Sajecki Planning, dated February 2026.
- Land Use Compatibility Study, prepared by GHD, dated February 17, 2026.
- Minimum Distance Separation Report, prepared by MHBC Planning, dated November 14, 2025.
- Natural Heritage Assessment and Response to Peer Review Comments, prepared by GeoProcess Research Associates, dated February 2, 2026.
- Tree Inventory and Preservation Plan Report, prepared by Jackson Arboriculture, dated February 6, 2026.
- Traffic Impact Study, prepared by GHD, dated February 18, 2026.
- Preliminary Noise Study, prepared by Thornton Tomasetti, dated February 3, 2026.
- Peer Review Response (Noise Study), prepared by Thornton Tomasetti, dated March 26, 2026.
- Source Water Protection Appendix A Form, signed on February 5, 2026.
- Response to Hydrogeology Comments, prepared by C.F. Crozier & Associates, dated January 27, 2026.
- Response to Hydrogeology Comments, prepared by Townline Gateway Holdings, dated February 9, 2026.
- Response to Hydrogeology Comments, prepared by Soil Engineers, dated February 9, 2026.

2. Technical Comments

Based on our previous submission comments and review of documents identified in Section 1, we provide the following technical comments.

2.1. Deficiencies/Outstanding Matters

The following comments must be addressed to support the zoning bylaw amendment application.

No.	Matter	Document	Comment
1.	Storm Parameters	Functional Servicing and Stormwater Management Report	<u>GEI Comment (May 25, 2026)</u> Sections 3.1 and 4.5 states that a 4-hour Chicago storm was used in the VO model. However, Township standards require design storm events to use a 3-hour duration. We request that the modelling be revised to use 3 hours because a shorter storm duration may result in higher peak flow rates.
2.	Existing Drainage Patterns	Functional Servicing and Stormwater Management Report	<u>GEI Comment (May 25, 2026)</u> Section 2.0 mentions that existing drainage patterns will generally be maintained and Section 3.1 states that Catchments 101 and 102 drain to the north. However, Figure 2 (Existing Drainage Plan) suggests that Catchment 102 drains to a low spot in the middle of the site, where stormwater likely ponds and infiltrates. Therefore, pre-development flow rates (and thus the target flow rates for the proposed development) are likely lower than the values presented.
3.	Water Balance	Functional Servicing and Stormwater Management Report	<u>GEI Comment (May 25, 2026)</u> Section 4.1 states that a water balance assessment will be prepared for SPA and that rooftop runoff could be infiltrated. Given our concern with matching existing drainage patterns (see Comment 2), we request that preliminary water balance calculations be included in the report and conceptual infiltration structures be shown on the drawings to show that water balance can be met with on-site infiltration structures while maintaining minimum separation from building foundations, watermain and groundwater.
4.	Quality Control	Functional Servicing and Stormwater Management Report	<u>GEI Comment (May 25, 2026)</u> Section 4.2 states that an Up-Flo Filter unit (or approved equivalent) will provide 80% TSS removal. A “treatment train” approach is preferable, especially for industrial developments. While there may be limited opportunities for quality controls on the surface, there may be some opportunities for additional subsurface quality controls. Alternatively, please provide manufacturer specifications (including ETV verification) and sizing to demonstrate that a single unit will provide 80% TSS removal for the proposed development, preferably using ETV particle size distribution.
5.	Minor Errors	Functional Servicing and Stormwater	<u>GEI Comment (May 25, 2026)</u> Please note the following minor inconsistencies/typos for future submissions:

No.	Matter	Document	Comment
		Management Report	<ul style="list-style-type: none"> Section 1.0 mentions “three driveways” but there are only two driveways in the latest site plans. The site area in Section 1.1 does not appear to be correct. Section 4.3 states that “two pervious catchments” flow uncontrolled off-site but Figure 3 (Proposed Drainage Plan) suggests that there are three (catchments 202, 203 and 204). The “Required Detention Storage” of 18,878 m³ shown on the drawings and figures does not match the values presented in Table 3 or 4. The “Private Servicing Assessment” included in Appendix D does not appear to be the latest version.
6.	Minor Errors	Private Servicing Assessment	<p><u>GEI Comment (May 25, 2026)</u> Please note the following minor inconsistencies/typos for future submissions:</p> <ul style="list-style-type: none"> “Total Flow (L/day)” in the 6th column header of Tables 1 and 2 should read “Number of Units.” The “Total Daily Sewage Design Flow” value in Table 2 does not appear to be correct.
7.	Groundwater Monitoring	Hydrogeological Assessment	<p><u>GEI Comment (May 25, 2026)</u> Please continue groundwater monitoring until data is available for all seasons. When more conclusive monitoring data is available, please show the seasonal high groundwater elevation in relation to stormwater storage tank bottom and discuss any necessary mitigation required if necessary. Buoyancy calculations may be required.</p>
8.	Grading at Eastern Side of Property	Grading Plan	<p><u>GEI Comment (May 25, 2026)</u> Please show a swale along the eastern edge of the property to ensure that flows from catchment 203 are conveyed to the Ellis Road ditch, and do not flow on the adjacent property.</p>
9.	Water Supply	Site Plans	<p><u>GEI Comment (May 25, 2026)</u> On the Conceptual Site Plans, please show the locations of water supply well(s) and fire water supply tank(s).</p>

2.2. Completed/Approved Matters

The following comments have been addressed.

No.	Matter	Document	Comment

2.3. *Additional Commentary*

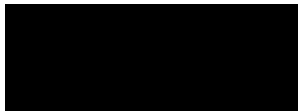
The following comments are provided for consideration.

No.	Matter	Comment
i.	Potential City of Cambridge Water and Sanitary Servicing	<u>GEI Comment (May 25, 2026)</u> Please keep the Township informed of discussion progress with the City of Cambridge regarding municipal water and sanitary servicing. It would be helpful to provide any relevant written correspondence with future submissions.

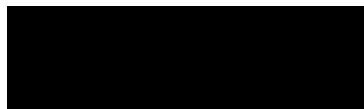
If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.
Senior Project Engineer



Parth Lad, P.Eng.
Technical Specialist

Project: 2501.08 (Puslinch File: D14-CUL)

May 25, 2026

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 and Official Plan
Amendment Application – 1st Technical Review
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).

1.0 Reviewed Materials

WHL reviewed the following submission materials from a peer review perspective in preparation of these 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.

2.0 Application Support

From a hydrogeological perspective, support for the application is contingent upon confirmation of adequate water and wastewater servicing plans for the proposed development.

3.0 Conditions of Approval

We recommend that the Township consider the following draft conditions as part of any approval of the Zoning By-Law Amendment and/or Official Plan Amendment:

1. That the proponent either:
 - a) Confirm their intent to apply for a Permit To Take Water (PTTW) from the Ministry of the Environment, Conservation and Parks (MECP); or,
 - b) Confirm that public water supply servicing will be obtained through an agreement with the City of Cambridge.
2. That the proponent either:
 - a) Confirm their intent to apply for an Environmental Compliance Approval (ECA) from the MECP for the proposed subsurface sewage disposal system(s); or,
 - b) Confirm that public wastewater servicing will be obtained through an agreement with the City of Cambridge.
3. That the proponent copy the Township Clerk on all submissions to the MECP to provide the Township with the opportunity to review and provide comments.

4. That any new water supply wells are constructed by a licensed well contractor in strict accordance with the requirements of Ontario Regulation 903, R.R.O. 1990 (Wells) (O. Reg. 903). Key requirements include, but are not limited to:
 - a) Well casing shall extend at least 40 cm above the ground surface.
 - b) Well shall be equipped with a commercially manufactured vermin-proof well cap (for drilled wells) or watertight cover (for dug/bored wells) to prevent entry of surface water and foreign materials.
 - c) Surface drainage shall prevent ponding in the vicinity of the well.
 - d) Wells must be sited to minimize the impact from leaching beds or other potential sources of contamination in accordance with the minimum separation distances specified in the regulation.
 - e) In areas where multiple aquifers are present, water supply wells installed within the lower aquifer must be appropriately cased and sealed into the lower aquifer to ensure isolation from the upper aquifer. Multi-aquifer wells are not supported by the Township.
 - f) Existing wells on the property may remain in use provided they comply with current standards under O. Reg. 903. Existing wells that will not be used must be decommissioned in accordance with O. Reg. 903.
5. That movement of fill material is conducted in accordance 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.

4.0 Additional Technical Requirements

Please note that additional hydrogeological assessment, monitoring and reporting requirements will apply at the Site Plan Application stage and will be provided separately as part of that application process.

For reference, the following minimum requirements will apply:

1. Groundwater Characterization: Determine shallow groundwater levels and flow patterns using an appropriate number of monitoring wells screened in the shallow overburden aquifer. Additional deeper wells may be required depending on the scale of the development.
 - a) Survey monitoring wells to a geodetic benchmark.

- b) Develop all wells to remove fines and improve hydraulic connectivity.
 - c) Conduct slug tests in all monitors to estimate hydraulic conductivity.
 - d) Collect baseline groundwater quality samples from at least two wells (including the one closest to existing residential development) for analysis of general chemistry, metals, and nutrients.
 - e) Monitor groundwater levels for at least 12 months to determine seasonal high and low groundwater levels.
 - f) The design elevations of building foundations, septic leaching beds, stormwater management (SWM) facilities and low impact development (LID) features must be evaluated in relation to the high water table.
2. Hydrological Characterization of Surface Water Features and Wetlands: Assess shallow groundwater and surface water levels and flow patterns using an appropriate number of shallow piezometers within onsite wetlands and surface water features to evaluate the existing hydrological regime. Nested pairs of piezometers are recommended in areas without permanent standing surface water. When choosing monitoring locations, ensure they account for the planned placement of SWM features. This will help accurately assess the existing hydrological regime and support effective impact monitoring.
- a) Survey piezometers to a geodetic benchmark.
 - b) Monitor groundwater and surface water levels at monitoring stations for at least 12 months to determine seasonal high and low water levels.
 - c) Collect spot flow measurements at monitoring stations to characterize the existing hydrological profile.
 - d) Evaluate groundwater contributions to wetlands and surface water features using interpreted horizontal and vertical gradient patterns.
3. Construction and Long-Term Dewatering: Estimate water quantity and quality, identify discharge locations, and outline management/mitigation plans. Long-term dewatering (e.g., building foundation drainage) is not recommended.
4. Water Balance: Prepare a monthly water balance in accordance with the Thornthwaite and Mather (1957) methodology and the TRCA/CVC Low Impact Development Stormwater Management Planning and Design Guide (2010) for the following conditions:
- a) pre-development,

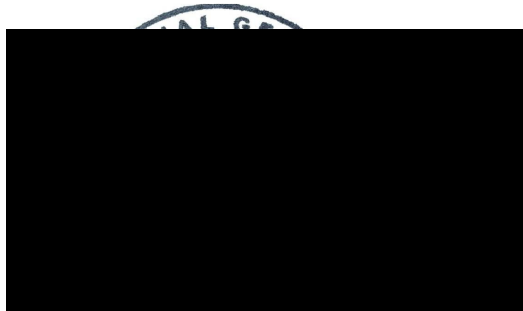
- b) post-development (without mitigation), and
 - c) post-development (with mitigation).
5. Soil Infiltration Testing: Conduct testing using a Guelph Permeameter (or equivalent) per 2012 TRCA Stormwater Management Criteria at appropriate locations and elevations based on the locations of proposed infiltration features.
6. Impact Assessment: Evaluate potential impacts on existing groundwater users and natural features, providing recommendations for monitoring and mitigation where appropriate.

5.0 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_{ESA}

Senior Hydrogeologist and CEO

Cell: 519-831-9696

Email: amason@wellingtonhydrogeology.com

May 25, 2026

3625

Township of Puslinch
1 MacDonald Square
Puslinch, ON
N0B 2J0

Attention: Monika Farncombe
Planning and Corporate Services Coordinator

**RE: Pt. Lt. 12, Con. 7, Hamlet of Belwood, Township of Centre Wellington
OPZ and ZBA Review Comments**

As requested, we have reviewed the updated Official Plan Amendment (OPA) and Zoning Bylaw Amendment (ZBA) Application materials submitted to the Township of Puslinch (the "Township") on behalf of Fieldgate Properties Limited in support of the proposed development at 2781-2809 Townline Road, Township of Puslinch, Ontario ("subject property"). 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. The proposed development consists of six industrial buildings, one retail store, and one gas station. 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. In December 2025, NRSI staff provided comments on the first OPA and ZBA 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. (February 2, 2026);
 - Tree Inventory and Preservation Plan Report, 2809 Townline Road, Puslinch, ON. Prepared by Jackson Arboriculture Inc., (February 6, 2026);
 - Functional Servicing Plan, 2809 Townline Road, Township of Puslinch. Prepared by Husson Engineering & Management. (February 5, 2026);
 - Preliminary Grading Plan SW1, 2809 Townline Road, Puslinch, Ontario; prepared by Husson Engineering & Management, Project No. 251619. (February 5, 2026);
 - County of Wellington Official Plan (last updated December 2025);
 - "Make a Map: Natural Heritage Areas", Ministry of Natural Resources (2026);
 - Grand River Conservation Authority (GRCA) Regulation Mapping, Grand River Conservation Authority (2026); and,
 - Natural Heritage Information Centre (NHIC) database (2026).

Comments on Reviewed Materials

NRSI staff's primary review comments have been summarized below, with fulsome comments and detailed provided in the appended matrix table.

- The revised NHA has generally addressed NRSI's previous natural heritage comments, including completion of desktop SAR/SWH screening, additional leaf-off bat habitat assessment, updated vegetation clearing timing windows, and Barn Swallow mitigation.
- With respect to the Puslinch Lake–Irish Creek Wetland Complex, NRSI does not identify additional natural heritage information requirements at this stage. However, a future submission should address the hydrogeological, water balance, infiltration, stormwater, and LID requirements identified through the Township's hydrogeological peer review process.
- The revised TIPP has addressed several previous comments, including updates to the tree removal count, ROW tree permissions, and reduced grading impacts to previously identified trees. However, additional tree-related items should be revisited through future Site Plan/detailed design review, including final tree retention feasibility, boundary/ROW tree permissions, and tree compensation.
- A tree compensation strategy has not yet been provided. NRSI recommends that compensation be provided at a minimum 2:1 ratio using native tree species tolerant of urban conditions and integrated into the future landscape plan.
- Natural heritage and tree protection mitigation measures should be coordinated through future approvals to ensure consistency across the final NHA, TIPP, grading plans, servicing/SWM plans, ESC plans, landscape plans, and construction notes.

Conclusion


Based on our review of the 2nd OPA and ZBA Application materials, it is our opinion that the application is complete from a natural heritage and arboricultural perspective. The revised materials have generally addressed NRSI's primary review comments. However, several items should be secured through conditions of approval and addressed through future Site Plan/detailed design review. These items should be addressed prior to site alteration and final approval, as applicable, to ensure the proposed development proceeds without negative impacts to natural heritage features and their ecological functions.

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.
Registered Professional Forester and Biologist



Sydney Gilmour, M.Sc.
Terrestrial and Wetland Biologist



NATURAL RESOURCE SOLUTIONS INC.

Aquatic, Terrestrial and Wetland Biologists

#	NRSI Comments (December 2025)	Updated NRSI Comments (May 2026)
1	<p>Confirm and briefly document that a desktop background screening (OP schedules, MNR/NHIC records, SAR/SWH screening, wildlife atlases) was completed to support the scoped NHA approach.</p>	<p>The revised NHA has addressed this comment. GeoProcess has added a desktop background screening section, including SAR and SWH screening for the subject property and adjacent lands. The revised report identifies the background sources reviewed, including NHIC records, wildlife atlases, citizen science databases, and other available species occurrence information. It should be noted that the Significant Wildlife Habitat SWH ecoregion 7E table was used for the background screening, despite the study area falling within ecoregion 6E. This comment is considered advisory only and SWH is not anticipated, based on the information provided.</p> <p>NRSI has no further comment on the scoped NHA approach at this time.</p>
2	<p>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</p>	<p>The revised NHA has generally addressed this comment. The report now provides a clearer discussion of the Puslinch Lake–Irish Creek Wetland Complex, including its spatial separation from the proposed development by Ellis Road, the proposed stormwater management approach, and the anticipated lack of direct impacts to the wetland feature. The revised NHA also concludes that, with implementation of the recommended mitigation measures, the proposed development can proceed without negative impacts to the PSW complex and bat maternity roost habitat.</p> <p>The conclusion of no negative impacts relies in part on the completion of the hydrogeological and stormwater-related requirements identified through the Township’s hydrogeological peer review process. As part of the detailed design process, a future submission should include the monthly pre- and post-development water balance, including mitigation/LID scenarios, groundwater monitoring/quality sampling, and infiltration testing identified by Wellington Hydrogeology Ltd. The final design should demonstrate that the proposed stormwater and servicing design will not result in negative impacts to the Puslinch Lake–Irish Creek Wetland Complex.</p> <p>It is anticipated these requirements may be completed as a future condition of approval.</p>
2b	<p>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.</p>	<p>The revised NHA has addressed this comment.</p>

2c	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.	This comment has been addressed. The revised NHA and TIPP include updated mitigation measures related to vegetation clearing, bat habitat, Barn Swallow nesting habitat, and tree protection. However, these measures should be revisited and coordinated through future approvals to ensure consistency across the final NHA, TIPP, grading plans, servicing/SWM plans, ESC plans, and construction notes.
3	Treat all identified habitat trees as candidate maternity/roosting habitat for migratory SAR bats.	This comment has been largely addressed from an impact mitigation perspective. The revised NHA identifies four trees with potential to support bat roosting habitat and recommends that tree removal occur outside the bat active season. However, the report should be revised to clarify that all identified habitat trees are being treated as candidate roosting habitat for all bat species with potential to occur, including migratory bat species (Eastern Red Bat and Hoary Bat, and Silver-haired Bat), and that the recommended timing window applies accordingly. This comment is considered advisory. NRSI has no further concern with this item.
4	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	This comment has been addressed. An additional bat habitat assessment was completed during leaf-off conditions, and four potential bat habitat trees were identified within the subject property. The revised NHA also appropriately prescribes a timing window restricting vegetation removal to December 1 to March 14, with no vegetation removal between March 15 and November 30. Subject to this mitigation being carried forward into future Site Plan conditions and construction notes, NRSI has no further comment on this item.
5	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).	Addressed.
Tree Preservation Plan Comments (Jackson Arboriculture Inc., February 2026)		
6	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.	<p>This comment has been partially addressed. The revised TIPP provides an updated impact assessment and specifically discusses the proposed encroachment within the mTPZ of Tree 167. However, the revised TIPP does not appear to provide the requested confirmation for all trees previously identified by NRSI as having potential grading or construction impacts within their mTPZ/TPZ, including Trees 7, 19, 20, 24, 32–43, 48–57, and 73, though it is noted that encroachment is no longer anticipated within the mTPZ of the majority of these trees.</p> <p>It is recommended that an updated TIPP be prepared through future Site Plan/detailed design review, once final grading, servicing, and construction limits are confirmed and that the updated TIPP should final tree preservation/retention.</p>

7	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 (<i>Acer platanoides</i>)) or non-native cultivars (e.g., Honey Locust (<i>Gleditsia triacanthos</i>));	N/A
8	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.	This comment has been partially addressed. The revised TIPP acknowledges that Trees 44, 45, and 47 appear to be located within the Townline Road allowance and confirms that Township permission will be required prior to their removal. However, a number of other ROW trees along Townline Road are still proposed for retention, including non-native and/or cultivar species, and their long-term retention feasibility should be revisited through future Site Plan/detailed design review. Once final grading, servicing, and streetscape/landscape plans are available, the applicant should confirm whether these ROW trees will be retained or removed and replaced with native species.
9	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;	This comment has been generally addressed. Based on the revised grading/TIPP materials, grading appears to have been pulled back to avoid or substantially reduce impacts to Trees 150, 151, 154, 169, 175, 178, and 186. Any injury or removal of boundary trees will require written consent from the shared owner in accordance with the Forestry Act, R.S.O. 1990. Currently, no boundary trees appear to be prescribed for removal, however this should be confirmed through the updated TIPP prepared at detailed design.
10	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.	This comment has been addressed. Tree protection fencing has been prescribed in order to preserve these trees.
11	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.	This comment remains applicable. The revised TIPP now identifies 19 trees for removal; however, a tree compensation strategy has not been provided. It is recommended that compensation be provided at a minimum 2:1 ratio using native tree species tolerant of urban conditions, integrated into the future landscape plan. This should be addressed through future Site Plan/detailed design review.
12	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.	This comment remains applicable and can be addressed within a forthcoming submission.



May 25, 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
1st Technical Review, ZBA 1st Submission
Township Peer Review Comments**

Dear Monika,

I've completed my technical review of the TIS prepared by GHD (GHD TIS) for the site noted above as requested. This review is from the perspective of the Township – The Region of Waterloo and the Ministry of Transportation will also be reviewing and providing comments on the study reflecting Regional and Provincial considerations. In particular, access to the site is proposed on Townline Road, which is a Regional road and all of the study area intersections are under either Regional or Ministry jurisdiction. My comments will be limited to the land use, the site concept plan, and matters of interest to the Township.

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. My comments are as follows:

- There is a small section of sidewalk on the west side of Townline road south of Jamieson Parkway, but it does not extend across the full frontage of this site or through the study area.
- The background development at 2420-2780 Townline Road has been appropriately incorporated into the study. No Saturday peak hour traffic volumes were provided to the consultant to incorporate. This background site is intended for manufacturing and warehouse uses; the amount of traffic from these uses when the overall site traffic generation for the site is relatively small (101 total trips in the weekday afternoon peak hour) is likely to be less than 30 trips during the Saturday peak hour and have little impact on the flow of traffic in the study area.
- I am not in agreement with the methodology by which the study forecasts site traffic. While the warehouse land use could be applied to individual buildings, the use of the industrial park land use is intended, in my opinion, to be applied to the group of

buildings all together because it recognizes synergies between adjacent industrial uses when they are grouped together. Further, the industrial park land use includes warehouse uses, so the industrial park land use could have been applied to all the industrial uses on the site. The result is that forecast for the industrial traffic is high, in my opinion.

- I'm also not in agreement with the way the study forecasts the retail traffic. In my opinion, the study should look at various potential retail uses and choose the one that is either the most likely or the most conservative. Using an average of several potential land uses is not preferred. And two of the chosen land uses for study are not appropriate for the size of the store. In my opinion, the use of either the free-standing discount superstore (LU code 813) or the shopping centre (LU code 820) land uses would have been more appropriate for this site. The study appears to underestimate the trip generation potential of the retail uses. And the labelling of the gas bar land use in Table 3 is incorrect.
- The study needs to be revised to update the trip generation forecasts for the site.
- It's difficult to assess the trip distribution for the commercial uses on the site. I agree with the report that only 5% of the traffic is likely to be destined to and from the east on Ellis Road/Sideroad 10N for both retail and industrial uses. The report includes for a range of distribution to Highway 401 of the commercial traffic of between 10 and 25 percent. Depending on the nature of the retailer, there may be more of a regional draw and more traffic to and from Highway 401, which could change the retail traffic pattern, and therefore the impacts of this development. The study identifies the need for some substantial road improvements on Townline Road that may not be needed if more of the traffic is destined to and from Highway 401. I defer to my colleagues at the Region of Waterloo and the MTO to comment on the distribution on their roadways, but wanted to draw their attention to this item for review.
- The two concept plans both include two new driveway connections to the road network. Both driveways have drive aisle connections within the area where cars may queue exiting the site. The updated study should include commentary on the length of the expected queues and locate the first drive aisle beyond the expected queues at the two new driveway connections.
- A map illustrating the existing active transportation facilities in the study area and how the proposal will connect to and enhance those facilities should be provided. It may be desirable to incorporate a sidewalk on the east side of Townline Road (or the west side if preferred) between Jamieson Parkway and Ellis Road for people to access the site by walking. Pedestrian and cycling elements in the concept plan should be highlighted along with the connections to the rest of the network.
- Parking is being proposed to meet the requirements of the Township Zoning By-law.



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

1. **Application support:** I am not yet in support of the application.
2. **Conditions of approval:** n/a.
3. **If you cannot support the application, why?:** see comments above.
4. **Technical Items required to support the application:** an updated trip generation forecast as part of a revised study with additional information as requested above is needed.

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
Josh Falshaw and Chris Clary-Lemon, Region of Waterloo
Desmond Brown, MTO



May 27, 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). The “Peer Review Response – Preliminary Noise Study, 2809 Townline Road, Twp of Puslinch, ON”, dated March 26, 2026, prepared by TT has also been considered in preparing the comments below.

Our comments are:

- 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. TT have confirmed that the existing sound barriers have not 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.

TT has stated that the height of the existing sound barrier was confirmed to be 1.5 m in height (3 panels that are each 0.5 m high). Review of the images on Google Earth seem to show 3 panels atop a precast panel along Jamieson Parkway. The precast panel appears to be replaced by a 4th panel along Townline Road. Further investigation is requested.

- 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. TT has indicated that an updated assessment including for the existing sound barrier and for all facades of the residential dwellings will be completed.

- c. What noise mitigation is proposed for the levelling plate impulses, what amount of noise reduction has been accounted for and what is the resulting levelling plate impulsive noise level?
- 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. In addition, our review of the Site Trip Generation tables in the November 18, 2025 Traffic Impact Study presents peak hour truck volumes significantly higher than those used in the Noise Study. Clarification is requested.
- e. NPC-300 requires a predictable worst-case noise assessment. Assuming impulses are distributed across the entire site or a limited number of impulses at a single location do not reflect the predictable worst-case scenario. Other scenarios should also be considered. For example, it would be reasonable to assume that loading activities are only occurring at one of the warehouse buildings on the site. This would concentrate impulses closer to a receptor and likely result in somewhat higher noise impacts than those calculated by TT.
- f. Assessment results that include the reefers are not included in Appendix E. Subsequent information provided by TT does not clarify whether refrigerated trucks will operate on the site.

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
2026-05-27 Peer Review V3.0 .docx