

**D14-MCC – 4539 Victoria Rd S – Zoning Bylaw Amendment – 1st Submission Comment
Summary**

Consultant	Comments
Ecology – NRSI	See attached letter
Source Water	See attached letter
GRCA	See attached letter
Township Bylaw Department	No Comments
Township Engineer – GEI	See attached letter
County Planning Department	<p>Please find the County Planning comments below in reference to deeming the Zoning By-law Amendment application for 4539 Victoria Road South complete:</p> <p>It is acknowledged that the applicant has provided a Planning Justification Report and a Draft Zoning By-law Amendment.</p> <p>It is noted that, as part of the pre-consultation, a detailed Site Plan was requested by both the Township and the County. It is recommended that additional details be added to the Site Plan for the next submission, specifically the extent of the Greenlands System on the subject property and the associated setbacks between the proposed use and the Greenlands System.</p> <p>It is noted that within the submitted Planning Justification Report, reference is made to a property in the Town of Erin. It is recommended that these references be removed from the report.</p> <p>County Planning staff have no objection to the application being deemed complete. Detailed comments will be provided after the application has been deemed complete and circulated for formal review.</p>
Township Fire Department	No comments

Township Public Works Department	No comments
Township Building Department	No comments
NPG	See attached letter
Hydrogeology	No comments

November 7, 2025

3378

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

Attention: Monika Farncombe
Planning and Corporate Services Coordinator

**RE: 4539 Victoria Road South, Township of Puslinch
Zoning By-law Amendment Application Review Comments**

As requested, we have reviewed the Zoning By-law Amendment (ZBA) Application ('Application') submitted to the Township of Puslinch by Riepma Consultants Inc. (Clare Riepma) on behalf of Stephanie McCrone for proposed recreational vehicle (RV) storage at 4539 Victoria Road South, Township of Puslinch, Ontario ('subject property'). Our comments are set out below.

Background

The subject property is located northeast of Victoria Road South and southeast of Maltby Road East in the Township of Puslinch, Ontario. It is understood that the applicant wishes to store RVs, portable sheds, and similar items within the central portion of their property, as illustrated in the Application. In May 2024, NRSI staff provided peer review comments (May 27, 2024) on a Pre-Consultation Request, at the request of the Township.

Reviewed Materials

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

- 4539 Victoria Road South, Puslinch, Planning Justification Report. Prepared by Riepma Consultants Inc. (October 2025);
- Plan of Survey of Part of Lot 18, Concession 9, Township of Puslinch, County of Wellington. Prepared by Van Harten Land Surveyors-Engineers (September 2025);
- Grand River Conservation Authority Regulation Mapping, Grand River Conservation Authority (2025);
- Township of Puslinch Comprehensive Zoning By-law No. 023-18 (Consolidated April 2025);
- County of Wellington Official Plan. Corporation of the County of Wellington (last updated May 2025); and,
- Natural Heritage Information Centre (NHIC) Make a Natural Heritage Area Map Application (MNR 2025).

Comments on Reviewed Materials

- The subject property contains a portion of the Mill Creek Puslinch Provincially Significant Wetland (PSW) within the northeastern and southeast. A small (<0.5ha) unevaluated wetland feature is located within the southeast corner of the subject property. A small (<0.5a) pond is also located within the southwest corner of the subject property. A GRCA-regulated watercourse feature and associated floodplain is located along the northern section of the subject property.
- Available air photography shows intermittent tree cover throughout the subject property and a more densely treed area within the north and northeast sections of the property. Based on this, it is anticipated that the property contains woodland that may be considered Significant under the County of Wellington Official Plan (last updated May 2025).
- As stated in our previous letter (NRSI 2024), available air photography appears to show recent disturbance (i.e., between 2021-2022 and 2022-2024) within the subject property, including what appears to be the development of a constructed access to the proposed RV storage area. It is unclear if this activity has been completed in compliance with the relevant municipal regulations. Clarification should be provided on this.
- Within the Pre-Consultation Request response (NRSI 2024), NRSI staff recommended a concept plan be prepared. It is recommended that an ecologist or similar qualified biologist be retained to confirm the presence or absence of woodland within the property, or other natural heritage features adjacent to the storage area. If woodland presence is confirmed, it is recommended that the dripline be delineated where it exists on the subject property and the concept plan identify natural heritage features/constraints in relation to the proposed storage area.
- Should the area proposed for RV storage exist within or directly adjacent (as per County of Wellington Official Plan standards) to regulated natural heritage features or the GRCA's regulation area, the completion of an Environmental Impact Study (EIS) may be required to assess potential impacts that the proposed storage activity may have on the existing natural heritage features on and adjacent to the subject property.

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

Sincerely,
Natural Resource Solutions Inc.



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

A handwritten signature in cursive script, appearing to read "Sydney Gilmour".

Sydney Gilmour, M.Sc.
Terrestrial and Wetland Biologist



11/03/2025

Memorandum

To: Monika Farncombe - Planning and Corporate Services Coordinator, Township of Puslinch

From: Keira Martinson - Source Protection Coordinator, Wellington Source Water Protection

Reviewed By: Kyle Davis - Risk Management Official, Township of Puslinch

RE: **4539 Victoria Rd S, Township of Puslinch
Zoning By-Law Amendment**

Wellington Source Water Protection (WSWP) staff have had the opportunity to review the submitted documents in support of the above noted application. This property is located within a vulnerable area and our review was completed to ensure the activities at this property meet the requirements of relevant Source Protection Plan and County of Wellington Official Plan policies.

Clean Water Act Section 59 Notice & Risk Management Plan:

A Section 59 Notice and Risk Management Plan are not required for this proposal. If the nature of the development changes, Notices may apply and Risk Management Plan may be required.

Land Use Planning:

WSWP recommends the following conditions be added to the Zoning By-Law Amendment:

1. The submission of a fuel spill plan, which outlines what actions would be taken to contain and mitigate fuel if it were to spill from any of the vehicles stored on site.

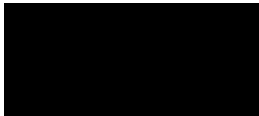
For more information, please contact sourcewater@centrewellington.ca.

Sincerely,



Nov 3, 2025

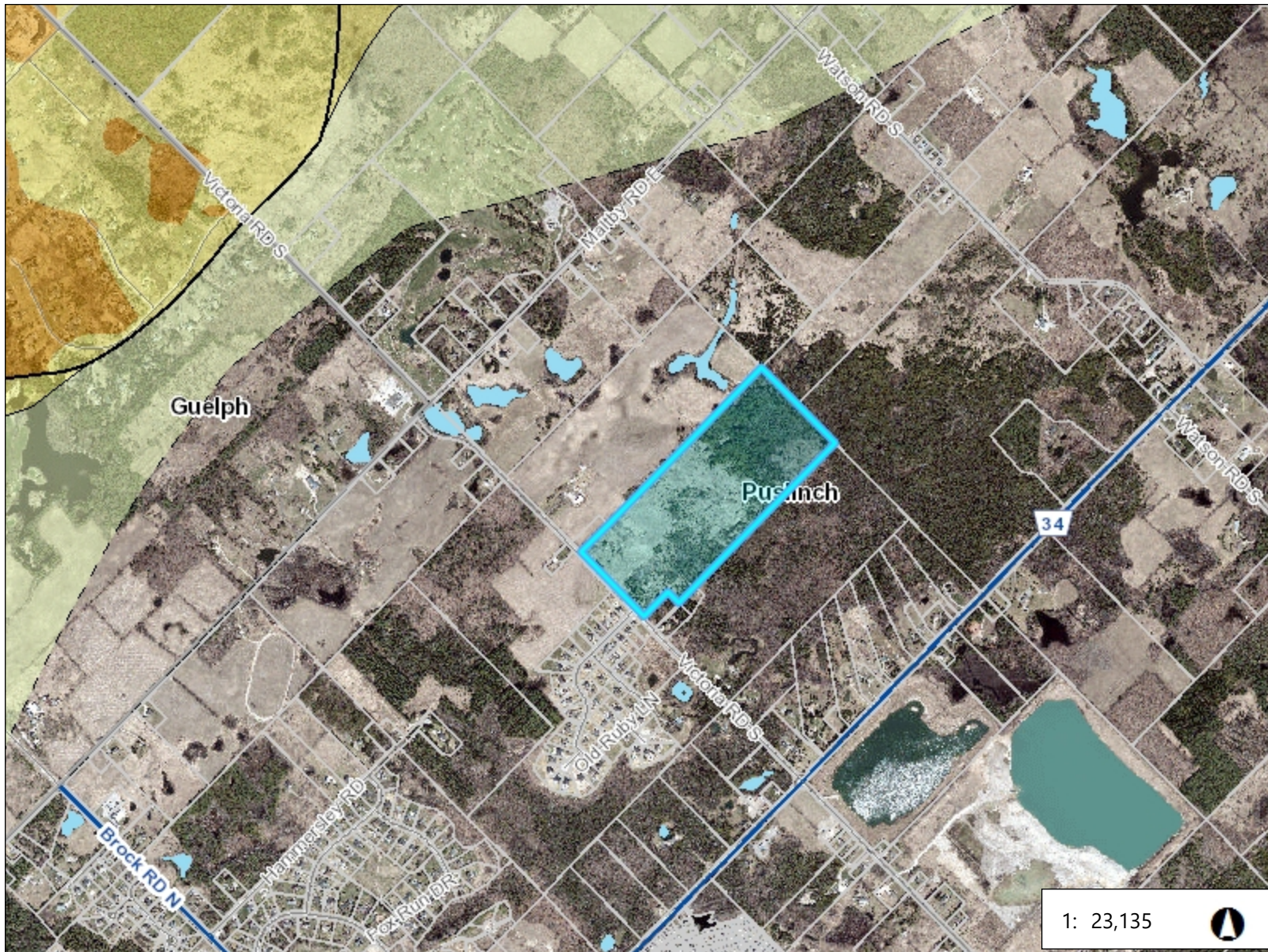
Keira Martinson
Source Protection Coordinator
519-846-9691 ext 283
kmartinson@centrewellington.ca



Nov 3, 2025

Kyle Davis
Risk Management Official
519-846-9691 ext 362
kdavis@centrewellington.ca

Attachments: Vulnerable Area Maps



Legend

- Parcels
- Roads - Small Scale**
 - Local Road
 - County Road
 - Highway
- Waterbodies
- Municipalities
- Well Locations**
 - Existing
 - Proposed
- Issue Contributing Area**
 - Chloride
 - Nitrate
 - Sodium
 - TCE
- Wellhead Protection Area**
 - A
 - B
 - C
 - D
- Vulnerability Score**
 - 10
 - 8, D; 8, C
 - 2, 4, 6 (A, B or C)
 - 2,4,6, D; 2,4, D; 2, 4, 6 (D); 4, D; 6,
- HVA

1: 23,135



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

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Notes







SWP_Comments_VictoriaRdS_4539_v2

Final Audit Report

2025-11-03

Created:	2025-11-03
By:	Keira Martinson (kmartinson@centrewellington.ca)
Status:	Signed
Transaction ID:	CBJCHBCAABAABMdmw8-ABTSNeLzbPLAzDQwi8LDir6VA

"SWP_Comments_VictoriaRdS_4539_v2" History

-  Document created by Keira Martinson (kmartinson@centrewellington.ca)
2025-11-03 - 2:22:46 PM GMT
-  Document e-signed by Keira Martinson (kmartinson@centrewellington.ca)
Signature Date: 2025-11-03 - 2:25:06 PM GMT - Time Source: server
-  Document emailed to Kyle Davis (kdavis@centrewellington.ca) for signature
2025-11-03 - 2:25:09 PM GMT
-  Email viewed by Kyle Davis (kdavis@centrewellington.ca)
2025-11-03 - 2:30:05 PM GMT
-  Document e-signed by Kyle Davis (kdavis@centrewellington.ca)
Signature Date: 2025-11-03 - 2:31:56 PM GMT - Time Source: server
-  Agreement completed.
2025-11-03 - 2:31:56 PM GMT



Administration Centre: 400 Clyde Road, P.O. Box 729 Cambridge, ON N1R 5W6

Phone: 519-621-2761 Toll free: 1-866-900-4722 Fax: 519-621-4844 www.grandriver.ca

October 31, 2025

Via email

D14-MCC

Monika Farncombe
Development and Legislative Coordinator
7404 Wellington Road 34
Township of Puslinch, ON N0B 2J0

Dear Monika Farncombe,

Re: Complete Application Review
D14-MCC
4539 Victoria Road South, Puslinch

Grand River Conservation Authority (GRCA) staff has reviewed the materials submitted in support of Zoning By-law Amendment application D14-MCC located at 4538 Victoria Road South, within the Township of Puslinch. The Zoning By-law Amendment proposes to re-zone a 0.6 ha portion of the property to outdoor storage for recreational vehicles, portable sheds, and similar uses.

Information currently available at this office indicates that the subject land contains wetlands and slope erosion hazards. Due to the presence of these features and their associated regulated allowances, portions of the subject land are regulated by the GRCA under Ontario Regulation 41/24 (Prohibited Activities, Exemptions, and Permits). A copy of GRCA's resource mapping is attached.

Any future development activity within the GRCA regulated area will require the prior written approval from GRCA in the form of a permit pursuant to Ontario Regulation 41/24.

Recommendation

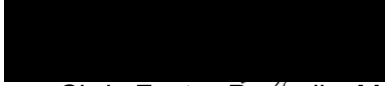
GRCA staff recommend that the site plan is updated to include the wetland features and the extent of the GRCA's regulated area. All development should be located outside of the regulated area. This information may be downloaded from our website:

<https://data.grandriver.ca/downloads-geospatial.html>.

Consistent with GRCA's 2024 approved fee schedule, this application will be considered a minor zoning by-law amendment. Upon receipt of a formal application, the applicant will be invoiced in the amount of \$465 for the GRCA's review of the application.

Should you have any questions, please contact Brandon Henderson at Bhenderson@grandriver.ca or 519-621-2763 ext. 2327.

Sincerely,



Chris Foster-Pengelly, M.Sc.
Supervisor of Resource Planning and Regulation Services
Grand River Conservation Authority

Enclosed: GRCA Resource Mapping

October 21, 2025

GEI Project No. 2402588 – 123006-021

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

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

**Re: ZBA 1st Submission
4539 Victoria Road South
Puslinch, ON**

Dear Ms. Farncombe:

Following our review of first submission documents for Zoning By-Law Amendment application received on October 21, 2025, we are providing comments in support of the proposed development on the subject lands located at 4539 Victoria Road South in the Township of Puslinch.

It is our understanding that the proposed development does not include any grading, tree removal or site disturbance. Rezoning is required to permit outdoor storage.

A pre-consultation meeting was held on June 20, 2024.

1. Documents Received

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

- Draft Zoning By-law Amendment.
- Plan of Survey, prepared by Van Harten, dated September 29, 2025.

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

- Planning Justification Report, prepared by Riepma Consultants, dated October 2025.

2. Additional Documents Required

From an engineering perspective, the documents requested as part of the pre-consultation to support the future zoning bylaw amendment application have been provided. The zoning bylaw amendment application can therefore be considered complete from an engineering perspective.

3. Technical Comments

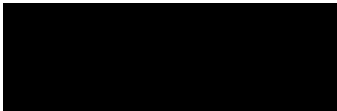
We note that as part of the pre-consultation (our letter dated May 28, 2024), a Site Plan was requested. While the Plan of Survey provided as part of this submission does show some of required details of a Site Plan, additional information should be added to the plan for the next submission, including:

- GRCA regulation limits. The GRCA's pre-consultation letter (dated May 28, 2024) notes that access/egress to the storage area shall be located outside the regulated areas.
- Well and septic system for the existing residence.
- All driveways, walkways and parking areas.
- Any fencing, lighting or signs.
- Outdoor storage areas and suitable fire route.

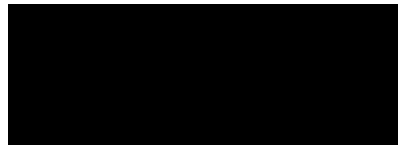
If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.
Project Engineer



Parth Lad, E.I.T.
Technical Specialist



November 5, 2025

Monika Farncombe
7404 Wellington Road 34,
Puslinch, Ontario

Dear Monika Farncombe,

RE: **NPG Comments**
4539 Victoria Road South
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 to permit an existing outdoor storage area of 0.6 hectares for recreational vehicles, portable sheds and other items on lands municipally known as 4539 Victoria Road South (Subject Lands). The Subject Lands currently contain a single detached dwelling, a detached garage and the existing outdoor storage area. In addition, a portion of the lands are presently used for agricultural purposes. The Subject Lands have a frontage of 349.6 meters along Victoria Road South and are 49.7 hectares in size. Surrounding uses consist of natural features to the east, natural features and residential uses to the south, residential uses to the west and agricultural uses to the north.



A large portion of the Subject Lands is located within the Grand River Conservation Authority (GRCA) regulation limit. In detail, a large portion of the rear yard contains wetlands (including provincially significant wetlands), woodlands, a regulated watercourse and associated floodplains. In addition, there appears to be a wetland located in the southwest corner of the Subject Lands (which is also within the GRCA regulation limit) near the proposed outdoor storage use.

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

- Draft Zoning By-law Amendment;
- Plan of Survey of the Subject Lands prepared by Van Harten Surveying Inc., dated September 29, 2025; and
- Planning Justification Report prepared by Riepma Consultants Inc., dated October 2025.



NPG Planning Solutions
4999 Victoria Ave | Niagara Falls, ON L2E 4C9
npgsolutions.ca

 (905) 321 6743
 info@npgsolutions.ca

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

- a) From a planning perspective, the following materials are required in the subsequent submission for our comprehensive review of the application:
 - i. An updated Site Plan including the information outlined below;
 - ii. Legal Description including Property Index Map and Parcel Registers (including all PIN Printouts and Legal Instruments); and
 - iii. An updated Planning Justification Report (PJR) with the matters outlined below addressed.

3. Technical Comments:

- a) We note that the Applicant submitted a plan of survey, prepared by Van Harten Surveying Inc., in lieu of a conceptual site plan. This plan should be updated to include the following information:
 - i. The entire extent of the Subject Lands and existing land uses of adjacent properties;
 - ii. The extent of the NE zone and the minimum setback between the proposed outdoor storage area and the NE zone. Subject to the setback, we may provide further comments;
 - iii. The surface of the outdoor storage area;
 - iv. The extent of the current agricultural operations on the lands;
 - v. All existing and proposed driveways;
 - vi. The location and size of the farm stand;
 - vii. A zoning matrix to demonstrate the proposal's compliance with the Puslinch Zoning By-law's applicable regulations, including regulations of the parent zone and General Provisions. In particular, Section 4.22, including requirements for outdoor storage areas, needs to be addressed in the zoning matrix.
- b) It appears that the 0.6 hectares of lands identified as outdoor storage area include an access off Victoria Road South. If the access is only to connect the outdoor storage area and Victoria Road South, it may not have to be included in the

calculation of the outdoor storage area. Please update the Site Plan to show the extent of lands proposed for the outdoor storage use which should include areas dedicated to store the proposed items as well as maneuvering aisles and driveways needed for the circulation within the outdoor storage area. Please also identify the minimum setbacks from the outdoor storage use to all property lines.

- c) With respect to the Planning Justification Report, we offer the following commentary:
- i. We note that Appendices 5-7 seem to reference to a different property in the Town of Erin instead of the Subject Lands. Section 7.4 of the report identifies the Subject Lands' zoning as Agricultural, Natural Environment and Rural Environmental Protection. The Subject Lands are zoned Agricultural (A) and Natural Environment (NE) with an Environmental Protection Overlay under the Puslinch Zoning By-law. Please revise this report, particularly if any of the planning opinions change as a result.
 - ii. This report mentions a portion of the open area of the property is subject to a fill permit to create additional land for agricultural use. Please confirm if a Site Alteration permit has been obtained or is intended to be applied. Please confirm if this means there is additional land identified for agricultural operations in the future. If so, please identify them on the Site Plan.
 - iii. Should the zoning matrix identify any non-compliances with the Puslinch Zoning By-law, this report should provide justifications for any site-specific zoning amendment required to facilitate the proposed use.
 - iv. As mentioned, the proposed use is on adjacent lands as per Policy 5.6.3 of the County Official Plan. We defer to the Township's ecologist and the GRCA to determine whether an Environmental Impact Statement is required and whether the relevant environmental policies under the County Official Plan have been met.
 - v. As mentioned, the proposed use needs to demonstrate conformity with the County of Wellington Official Plan, specifically section 6.5.5. Although this report includes discussion of this section, more analysis is required to justify the proposed use in the Secondary Agricultural Areas. Specifically, please discuss the following in the revised report:
 - Please elaborate on the need for the proposed use to be in a non-urban location, specifically from a market requirements, land requirements and compatibility issues' perspectives;
 - In lieu of an Agricultural Impact Assessment, please elaborate on the nature of the current agricultural operation on the property and discuss how the proposed use does not hinder or preclude the potential for agriculture on the Subject Lands and in the immediate surrounding areas; and
 - Furthermore, the applicant should provide comparable examples of other outdoor storage areas in comparable municipalities to justify the scale of

the outdoor storage area in accordance with Policy 6.5.5 e) of the County of Wellington Official Plan.

- d) As we do not have all the necessary information, we are not able to conduct a comprehensive review of the proposal against the Puslinch Zoning By-law. However, we want to highlight the following:
- i. It is mentioned that the outdoor storage area will be used to store recreational vehicles, portable sheds and similar items. Please provide a list of all the items that are proposed to be stored in this area. Section 4.22 of the Puslinch Zoning By-law prohibits the storage of certain items in outdoor storage areas. If shipping containers are proposed to be stored within this area, Section 4.24 of the Puslinch Zoning By-law will apply.
 - ii. Please provide the maximum number of recreational vehicles, portable sheds and other items that are proposed to be stored in the outdoor storage area.
 - iii. Please confirm if any recreational vehicles will be sold from the Subject Lands;
 - iv. Please confirm if the outdoor storage area will be seasonal or year-round storage;
 - v. Please confirm how many people will be employed by the use;
 - vi. Please confirm if the farm stand fits the definition of “farm products sale outlet”, a permitted use under the Agricultural Zone (A) and whether the farm stand is permanently attached or fixed to the ground or other structures.
 - vii. Section 4.22 iii. of the Puslinch Zoning By-law requires the outdoor storage area to not exceed the lesser of 25% of the total lot area and the total ground floor area of the principal building on the lot. The Applicant should provide the total lot area and the total ground floor area of the dwelling to verify zoning compliance.
 - viii. Section 4.22 iv. of the Puslinch Zoning By-law states outdoor storage areas shall be screened by opaque fencing, a masonry wall, landscaping, or berms, to the satisfaction of the Township. Please identify if any of such measures are proposed. At the minimum, some form of physical demarcation of the outdoor storage area would be supported so as to encroach into the agricultural areas in the future.
- e) We have reviewed the Draft Zoning By-law and have the following comments:
- i. Please provide Schedule A to the draft Zoning By-law;
 - ii. Please identify what the lands are proposed to be rezoned into, for example an Agricultural Site-Specific Zone (A(spXX)); and
 - iii. The draft Zoning By-law should also include any site-specific provisions

required to address non-compliances from the Puslinch Zoning By-law.

- f) If the Zoning By-law Amendment application is recommended for approval, we anticipate a holding provision would be proposed, requiring the outdoor storage use to receive Site Plan Approval and a Site Plan Agreement is registered on title.
- g) Please confirm if there is any existing or proposed exterior lighting in the outdoor storage area. Section 4.15 of the Township Zoning By-law provides regulations related to exterior lighting. If outdoor lighting is proposed as part of the proposed development, a Photometric Plan will be required at the site plan stage.
- h) Cash-in-lieu of parkland may be required in accordance with Section 42(1) of the *Planning Act*. Development charges may be required in accordance with the Township's Development Charges By-law No. 053-2024.
- 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

Sincerely,



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