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May 15, 2026

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 - Determination if Required**  
**Information and Materials Have Been Provided**

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NPG Planning Solutions Inc. (NPG) has been retained to provide comments on whether required information and materials have been provided regarding a Zoning By-law Amendment Application on lands municipally known as 4539 Victoria Road South (“Subject Lands”). Preliminary technical comments have also been provided.

The applicant is proposing to permit an existing outdoor storage area of 0.46 hectares for recreational vehicles, shipping containers, portable sheds, and other items on the 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 third submission for a Zoning By-law Amendment application. As part of this submission, NPG has reviewed the following documents:

- Draft Zoning By-law Amendment;

- Woodland Dripline Confirmation and Natural Heritage Assessment Memo prepared by GEI Consultants, dated April 16, 2026;
- Property Index Map and Parcel Register;
- Response Matrix prepared by Riepma Consultants Inc., dated April 30, 2026;
- Revised Planning Justification Report prepared by Riepma Consultants Inc., dated April 2026;
- Site Plan prepared by Riepma Consultants Inc., dated April 24, 2026; and
- Zoning Matrix for 4539 Victoria Road South Outdoor Storage Area.

## **Comments**

### **1. Determination of Completeness:**

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

### **2. Additional Requirements:**

- a. An updated Site Plan with the below matters addressed; and
- b. An updated Planning Justification report with the below matters addressed;
- c. An updated Draft Zoning By-law;
- d. An updated zoning matrix; and
- e. Requested spatial information as dwg file or a shapefile.

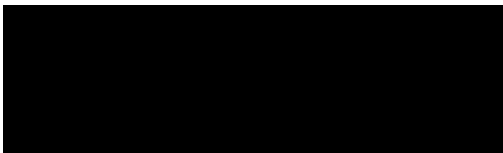
### **3. Technical Comments:**

- a. Consistent with our previous comments dated May 27<sup>th</sup>, 2024, if the Zoning By-law Amendment application is recommended for approval, we anticipate recommending a holding provision to require a Site Plan for the outdoor storage area to be approved under Section 41 of the *Planning Act* and a Site Plan Agreement to be registered on title before the outdoor storage use is permitted.
- b. With respect to the Site Plan, we offer the following comments:

- i. Please include a key map showing the full extent of the Subject Lands and illustrate minimum setback distances between the outdoor storage area and all lot lines.
  - ii. The existing detached dwelling and garage need to be shown on the Site Plan along with its minimum setbacks.
  - iii. Please clearly delineate the extent of the areas subject to the proposed rezoning, preferably using linework that is visually distinct from the other features.
- c. A schedule should be provided as part of the Draft Zoning By-law, outlining the extent of lands to be rezoned.
- d. With respect to the Planning Justification Report (PJR), Appendix 2 should be updated to reflect the extent of the area that is proposed to be rezoned in the Draft Zoning By-law.
- e. With respect to the comments to the Woodland Dripline Confirmation and Natural Heritage Assessment Memo, we offer the following comments:
  - i. The memo identifies that there are significant woodlands abutting the outdoor storage area. The memo should confirm if they are also considered *significant woodlands*, therefore a Greenlands feature, as per the County OP's criteria outlined in Section 5.5.4. Furthermore, the location of the outdoor storage area would be considered adjacent lands under policy 5.6.3. This memo should provide an analysis and confirmation of whether the proposed development conforms with section 5.6.2 of the County OP, which outlines criteria to permit development in the Greenland System or on adjacent lands.
  - ii. Figure 2 of this memo should be updated to clearly identify the extent of the significant woodlands identified on the Subject Lands.
  - iii. The memo identifies a number of recommendations. If accepted by the Township's ecologist, these recommendations may need to be incorporated into the Site Plan Agreement.

- iv. We defer to the Township's ecologist for technical review of the Memo and may provide additional comments following their assessment.
- f. Please submit spatial information either as a dwg file or shapefile that shows the Subject Lands boundaries, the extent of the proposed zone change area, the extent of the NE Zone and its 30 metre buffer, the extent of the outdoor storage area, and the extent of the significant woodlands and their recommended buffer widths. This is required to prepare the draft schedule of the Zoning By-law Amendment if the application is recommended for approval.
- g. If recommended for approval, we anticipate regulating the number of recreational vehicles, shipping containers, and sheds to be stored on site in the implementing Zoning By-law in addition to the maximum area where the outdoor storage use is permitted.
- h. The following information is available to assist with a submission:
  - i. Site Plan and Drawing Requirements - [https://puslinch.ca/wp-content/uploads/2020/09/Site-Plan-and-Drawing\\_Guidelines.pdf](https://puslinch.ca/wp-content/uploads/2020/09/Site-Plan-and-Drawing_Guidelines.pdf)
  - ii. Municipal Development Standards - [https://puslinch.ca/wp-content/uploads/2022/07/117006-3-Puslinch-Standards\\_FINAL-September-2019.pdf](https://puslinch.ca/wp-content/uploads/2022/07/117006-3-Puslinch-Standards_FINAL-September-2019.pdf)
  - iii. Puslinch Design Guidelines - <https://puslinch.ca/wp-content/uploads/2022/07/Puslinch-Design-Guidelines-Feb-2010.pdf>

Sincerely,



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



May 19, 2026

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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  
Third Zoning By-law Amendment Application Review Comments**

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As requested, we have reviewed the third 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 continue the storage of RVs, portable sheds, and similar items within the central portion of their property.

NRSI staff previously provided peer review comments (May 27, 2024) on a Pre-Consultation Request, first ZBA Application (November 7, 2025), and second ZBA Application (January 29, 2026) for the proposed RV storage use on the subject property.

**Reviewed Materials**

To complete this review assignment, NRSI staff have reviewed the following materials:

- Woodland Dripline Confirmation and Natural Heritage Assessment Memo, 4539 Victoria Road South, Puslinch, Ontario. Prepared by GEI (April 2026);
- 4539 Victoria Road South, Puslinch, Planning Justification Report. Prepared by Riepma Consultants Inc. (Updated April 2026);
- Response Matrix. Prepared by Riepma (April 2026);
- Site Plan- Outdoor Storage, 4539 Victoria South, Puslinch, Ontario. Prepared by Riepma (April 2026);
- "Make a Map: Natural Heritage Areas", Ministry of Natural Resources (2026);
- County of Wellington Official Plan (last updated December 2025);

- Township of Puslinch Comprehensive Zoning By-law No. 023-18 (Consolidated April 2025); and,
- Grand River Conservation Authority (GRCA) Regulation Mapping, Grand River Conservation Authority (2026).

### **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.
- As stated in our previous peer review letters (NRSI 2025, 2026), 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. The Natural Heritage Assessment appropriately delineates the outer limit (i.e., the dripline) of the on-site woodland and identifies the feature as a Significant Woodland associated with the Mill Creek Puslinch PSW. We agree with this conclusion, as well as the determination that the feature should be considered Significant Wildlife Habitat (SWH).
- It is noted that the Natural Heritage Assessment states that generalized Ecological Land Classifications assessments were completed for the subject property as part of the field surveys. While mapping of the existing ecological communities would typically be completed, a high-level description has been provided of the existing communities within the letter, which is considered sufficient for this application.
- Figure 2 in the Natural Heritage Assessment identifies the existing natural heritage features on and adjacent to the subject property, including wetlands, PSW, woodland, and areas designated Greenlands and Core Greenlands in the County of Wellington Official Plan (last updated December 2025), in relation to the proposed rezoning area. The proposed rezoning area appears to slightly overlap with the woodland dripline boundary. It is understood, based on the description provided within the submission materials, that the limit of rezoning corresponds with areas of existing disturbance (i.e., the existing access) and that this overlap will not result in any expanded area of disturbance within the woodland.
- An ecological assessment has been provided to evaluate the potential for direct and indirect impacts of the proposed storage area on the adjacent natural heritage features, including the Significant Woodland. It is understood that a woodland buffer has not been proposed, as the storage area and access are confined to an existing disturbed footprint adjacent to the woodland dripline and no additional encroachment into the feature is proposed. While a woodland buffer should typically be provided, NRSI staff acknowledge that the proposed use is limited to the continuation/formalization of an existing disturbed area and is not anticipated to result in additional woodland removal or encroachment. On this basis, NRSI staff generally agree with the proposed approach, provided GEI's proposed mitigation, including permanent Erosion and Sediment Control (ESC) fencing along the woodland dripline and the restriction of site activities to the existing disturbed area, are implemented.

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

Sincerely,  
Natural Resource Solutions Inc.



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



Sydney Gilmour, M.Sc.  
Terrestrial and Wetland Biologist