

D14-DAA – 3rd Submission Comment Summary – 7456 McLean Rd W

Consultant	Comments
Township Planner – NPG Planning	See attached letter
Township Ecologist – Dougan	See attached letter
Source Water	See attached letter
Township Traffic Consultant – Salvini	See attached letter
County of Wellington Planning	See attached letter
Township Hydrogeologist – Harden	<p>We have read the February 2026 Hydrogeology Investigation Report the revised FSR and the responses from Crozier to our previous comments</p> <p>There are two outstanding comments. The first comment should be addressed prior to our finding the application complete and get our support. As for the second comment we will make the MECP aware of our concerns related to the large sewage system being proposed.</p> <p>1)Groundwater elevations obtained in December 2025 require an explanation. The water levels obtained are between 3.5 and 6.5 metres lower than those obtained in July of 2025. One of the wells(MW1-21)) has a water level lower than the bottom of the well. The high groundwater elevations obtained in the spring of the year have been acknowledged and septic system will be designed accordingly.</p> <p>2) The site development requires a) a sewage system that achieves a very high level of nitrate reduction and b) is located at the downgradient edge of the site. This provides little or no natural attenuation from within the site. BH4 drilled near to the septic system location finds silty sands overlying sand and gravel. We acknowledge that because of the high volume of effluent that this is a matter for the MECP, however,</p>

	the Township has an interest in minimizing the impact on groundwater quality given the site location on the Galt Moraine. We will be pursuing the MECP to carefully address the fate of the effluent and we agree with Crozier that a monitoring plan may be required to verify off-site impacts.
County of Wellington Roads Department	See attached letter
Township Engineer - GEI	See attached letter



March 5th , 2026

Monika Farncombe
7404 Wellington Road 34,
Puslinch, Ontario

Dear Monika Farncombe,

RE: **NPG Comments**
7456 McLean Road East & 197 McLean Road West
RE: Application for Zoning By-law Amendment - 3rd Submission Technical Review

NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding a Zoning By-law Amendment Application (ZBA) proposing a truck gas bar, a car gas bar and two buildings consisting of a restaurant that comes with a drive-through service facility and a convenience store on lands municipally known as 7456 McLean Road West & 197 Brock Road South (“the Subject Lands”). The Subject Lands are presently vacant. The application proposes a one (1) storey convenience store (235 m² of gross floor area), one (1) storey drive thru restaurant (379 m² of gross floor area), six (6) truck gas bar pumps, eight (8) car gas bar pumps, 40 vehicle parking spaces (including 4 barrier-free parking spaces), 4 electric vehicle charging stations, 6 truck parking spaces, and 2 bicycle parking spaces. Furthermore, two vehicular (2) accesses are proposed, one (1) from Brock Road South and one (1) from McLean Road West.

The Subject Lands have a frontage of 101 metres along Brock Road South, a frontage of 113.7 meters along Mclean Road West, and a lot area of 1.62 ha. Surrounding uses consist of vacant lands that are zoned Industrial immediately to the north and west, industrial uses to the east, and commercial uses to the south. Aggregate operations and vacant lands are further to the west and north of the Subject Lands.

The Applicant proposes to rezone the Subject Lands from the Industrial Site-Specific Zone (IND(sp54)) with a holding provision (h-5) to a Highway Commercial Site-Specific Zone to facilitate the proposed development.

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



NPG Planning Solutions
Niagara Falls | Hamilton | Toronto | Kingston
npgsolutions.ca

☎ (905) 321 6743
✉ info@npgsolutions.ca

- Landscape Cost Estimate prepared by Marton Smith Landscape Architect's (MLSA), dated February 19, 2026;
- Landscape Plan prepared by Marton Smith Landscape Architect's (MLSA), dated February 19, 2026;
- Addendum Planning Justification Report prepared by W.E Oughtred and Associates Inc.; dated February 13, 2026;
- Civil Drawing Package prepared by C.F Crozier & Associates Inc, dated February 13, 2026;
- Comment Response letter prepared by C.F Crozier & Associates Inc, dated February 13, 2026;
- Site Plan prepared by Richard Ziegler Architect Inc., dated February 11, 2026;
- Cover Letter prepared by W.E Oughtred and Associates Inc.; dated February 13, 2026;
- Draft Zoning By-law;
- Elevations prepared by Richard Ziegler Architect Inc., dated February 11, 2026;
- Floor plans prepared by Richard Ziegler Architect Inc., dated February 11, 2026;
- Functional Servicing & Stormwater Management Report prepared by by C.F Crozier & Associates Inc, dated February 2026;
- Hydrogeological Investigation Report prepared by by C.F Crozier & Associates Inc, dated February 2026;
- Photometric Plan prepared by spline, dated January 27, 2024;
- Pump Plans prepared by Richard Ziegler Architect Inc., dated February 11, 2026;
- Rendered views prepared by Richard Ziegler Architect Inc., dated February 11, 2026;
- Roof Plans prepared by Richard Ziegler Architect Inc., dated February 11, 2026;
- Tree Inventory and Preservation Plan prepared by Kuntz Forestry Consulting Inc., dated February 11, 2026;
- Topography Survey prepared by Tarasick McMillan Kubicki Limited, dated November 3, 2022;
- Transportation Impact Study prepared by C.F Crozier & Associates Inc, dated February 2026;

1. Application Support:

- a. We acknowledge that the application has been deemed complete by the Township. At the moment, we are not prepared to recommend support for the application.

2. Additional Requirements:

- a. 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. The applicant should confirm when the properties municipally known as 7456 McLean Road West and 197 Brock Road South will be merged. Our comments, including compliance with the Puslinch Zoning y-law, have been provided based on the understanding that the Subject Lands will be merged in the future into one parcel.
- b. From email correspondence dated October 24, 2025, the applicant indicated that the property owner's solicitors were working towards having the restrictive covenant removed. The applicant should confirm if they are still working towards removing the restrictive covenant from 197 Brock Road and the timing of the removal. If the applicant does not intend to remove the restrictive covenant, we will require a legal opinion on what would happen to the restrictive covenant that currently applies to 197 Brock Road South once the Subject Lands are merged.
- c. We note that the Township's ecologist commented that the Site Plan needs to be revised to minimize tree clearance within the woodlands area on the Subject Lands to meet the requirements of the County of Wellington Woodland Conservation By-law No. 5115-09. While tree removal is not a directly a zoning issue, we encourage the applicant to resolve this comment from the Township's ecologist as changes to the Site Plan to meet the requirements of the County's by-law may necessitate additional site-specific zoning amendments.
- d. With respect to the Addendum to the Planning Justification Report, we offer the following comments:

- i. The Addendum to the Planning Justification Report must be signed by a Registered Professional Planner (RPP) in accordance with Section 4.6.1 of the Wellington County Official Plan (County Official Plan).
 - ii. The applicant should discuss how the proposed development is consistent with the definition of “Employment Areas” and Policy 2.8.2 of the Provincial Planning Statement (2024). As per the PPS, Employment Areas are defined as “those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities”. Under the PPS, uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use. The Addendum to the Planning Justification Report should identify the primary employment use on the Subject Lands and demonstrate how the proposed uses are ancillary/associated with the primary employment use.
 - iii. The addendum should also provide justification for the proposed amendment to the Puslinch Zoning By-law provision regarding the location of loading spaces.
- e. With respect to the Site Plan, we offer the following comments:
- i. The Site Plan should demonstrate the proposed surface of the parking areas. Sections 5.2.10 and 5.2.14.a.ii. of the Puslinch Zoning By-law regulate surface materials for parking areas and barrier-free parking spaces, respectively.
 - ii. The Puslinch Zoning By-law requires barrier-free parking spaces to have a minimum width of 3.6 metres. The applicant should revise the parking spaces number 9 and 17 to meet this requirement and/or include this as a site-specific relief in the Draft Zoning By-law.

- iii. The Site Plan should confirm the proposed dimensions for the bicycle parking spaces and loading space meet the requirements of the Puslinch Zoning By-law;
 - iv. Section 5.2.1.d. of the Puslinch Zoning By-law requires all parking spaces to be unobstructed and available for general parking purposes and used for that purpose at all times. The applicant should confirm if non-electric vehicles will be permitted to park at the proposed electrical vehicle parking stations and that these spaces comply with Section 5.2.1.d.
 - v. The Zoning Matrix identifies that two (2) bicycle parking spaces are proposed, however, four (4) spaces are shown on the Site Plan. We note that based on the proposal, two (2) bicycle parking spaces would be required.
 - vi. The Site Plan should demonstrate the setbacks for a buildings and structures, including the setback for the proposed convenience store to the northern lot line;
 - vii. The Zoning Matrix should be revised to reflect the actual proposed setbacks in the “Proposed” column to match with what are shown on the Site Plan;
 - viii. The term “daylight triangle” should be revised to “sight triangle”. The Site Plan should demonstrate the dimensions of the sight triangle, specifically the prescribed distance of 28 metres measured along the abutting lot lines from the theoretical intersection of the two lot lines.
 - ix. Section 4.26.1.a of the Puslinch Zoning By-law states that no vehicle shall be parked in such a manner as to impeded or obstruct the vision of persons driving vehicles on an abutting street above a height of 0.6 metres above the centreline of the said street. Is it possible to shift the stacking lane to be completely outside the sight triangle?
- f. With respect to the Landscape Plan we offer the following comments:

- i. Section 4.26.1.b.ii of the Puslinch Zoning By-law prohibits a fence, tree, hedge, bush or other vegetation, the top of which exceeds 0.6 metres in height above the elevation of the centre-line of the adjacent street within a defined sight triangle. The applicant should confirm that no proposed tree or plant materials higher than 0.6 metres are located in the sight triangle. The Landscape Plan should otherwise be revised.
 - ii. The term “daylight triangle” should be revised to “sight triangle”.
- g. With respect to the Transportation Impact Study (TIS), we offer the following comments:
 - i. We note that the Township’s traffic consultant commented that further information is required regarding the truck scale on the site. We will coordinate with the Township’s traffic consultant to understand if there will be additional traffic demand and/or parking required for the truck scale use.
 - ii. The applicant should clarify if the required 31 parking spaces noted in the ITE’s Parking Generation Manual is for 322.5 m² of net floor area, i.e. a parking rate of 1 space per 10.4 m² of net floor area. Additional analysis is required to justify the proposed rate of 13 m² of net floor area for the restaurant use in the draft Zoning By-law based on the ITE’s Parking Generation Manual.
 - iii. We had previously requested additional examples of parking and stacking requirements for restaurant use in comparable municipalities. While the revised TIS now includes stacking lane requirements for Township of Centre Wellington and the Town of Milton in addition to the Township of Guelph/Eramosa, it still does not address the combined effect of both parking and stacking requirements for restaurant and drive-through facility from these municipalities. Both the Township of Centre Wellington and the Town of Milton seem to have higher parking requirements than the Township of Puslinch for restaurant use and these apply in addition to their stacking requirements.

- iv. The surrogate demand survey demonstrates that sufficient stacking spaces are provided. However, the selected sample sites provide conflicting findings as to whether the proposed number of parking spaces are sufficient. The analysis also does not account for the difference in floor areas between the proposed development and the sample sites, nor provide a discussion as to how this may impact the demand for parking spaces.
- v. At this stage, we are not ready to support the requested amendment to the parking requirements under the Puslinch Zoning By-law. The applicant should consider providing adequate parking or revising the TIS to address our above concerns.
- h. Our comment's letter dated October 1st, 2025, requested that the applicant confirm, through a survey, the centreline of the McLean Road West's road allowance and whether road widening is needed from the Subject Lands to meet the minimum road width of 20 metres. The applicant has since provided a survey demonstrating that this section of McLean Road West is 20.12 metres wide. Based on this information, no road widening is required.
- i. With respect to the landscape buffer provided along Brock Road South. The applicant should consider increasing the width of the landscape buffer between the proposed stacking lane and the lot line abutting Brock Road South.
- j. Technical comments related to the Site Plan Control application will be provided when that application is circulated for review.
- k. 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
 - ii. Municipal Development Standards - 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>

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Sincerely,



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



3 - 7 Edinburgh Road South, Guelph, ON, N1H 5N8

March 5, 2026

Monika Farncombe
Planning and Corporate Services Coordinator
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0
mfarncombe@puslinch.ca

**RE: 7456 McLean Rd W Zoning Bylaw Amendment Application - 3rd Submission
- Ecology Comments**

Dear Monika,

Thank you for the opportunity to review the application for Zoning Bylaw Amendment for 7456 McLean Rd W. Dougan Ecology has reviewed the following documents:

- Comment response letter from W.E. Oughtred & Associates (February 13, 2026)
- Draft Zoning Bylaw Amendment (February 13, 2026)
- Conceptual Site Plan (February 11, 2026)
- Landscape Plan (February 19, 2026)
- Tree Inventory & Preservation Plan (February 11, 2026)

We offer the following comments, structured according to the Township's request.

1. Determination of Completeness

Complete.

2. Additional Requirements

Prior to any tree removal or site alteration, the proponent must obtain a Clearing Permit under the County of Wellington Woodland Conservation Bylaw 5115-09.



3. Application Support - If the application can be deemed complete, then are you in support of the application?

No.

4. If you support the application - What condition(s) of approval are required to be included in the site plan agreement?

n/a

5. If you cannot support the application - why?

County of Wellington Woodland Conservation Bylaw 5115-09 "Clearing Permit" states:

*4.4.3 An Officer may issue a Clearing Permit to permit the injuring or destruction of trees provided that the total area of tree removal **does not exceed 0.5 hectare (1.24 acres)**, and provided that the Officer is satisfied that the injuring or destruction of trees will be in compliance with agricultural and natural environment policies adopted by County Council from time to time.*

The current application involves clearing 1.12 ha of woodland, according to the Tree Inventory and Preservation Plan (TIPP). Bylaw 5115-09 Policy 4.4.3 allows for up to 0.5 ha of tree removal within a woodland, where permitted under an issued Permit. The Site Plan should be revised to meet the requirements and conditions of the bylaw, while minimizing impacts to the woodland. A permit under the bylaw is required to be obtained by the proponent prior to site alteration.

Prior to Site Plan Approval, the Woodland Conservation By-law applies and a Clearing Permit is required for any tree removal or site alteration. If tree removal is authorized as a condition of an approved Site Plan Agreement, the exemption under Section 3.1(d) of the By-law may apply and the permit requirement can be reassessed at that time.

6. Are there any technical items required to support the application?

Tree Inventory and Preservation Plan (Kuntz Forestry, 2026) Technical Comments:

1. Thank you for revising and adding the timing window for SAR bats as a specification on Figures 1 and 2 and in the report. Please note that recent additions of species of migratory bats to the ESA has **extended the roosting period from April 1 - November 30** in southern Ontario based on communications with MECP. Please revise the report to reference the updated approved tree removal window of **December 1 - March 31**.
2. The TIPP confirmed the presence of a designated woodland on the subject lands (Unit 1, Figure 2) which is proposed to be impacted by the proposal, including



the removal of 221 trees and 1.12 ha of woodland. As noted in the TIPP, the designated woodland triggers the **County of Wellington Woodland Conservation Bylaw 5115-09**. A permit under Bylaw 5115-09 is required prior to site alteration.

Prior to Site Plan Approval, the Woodland Conservation By-law applies and a Clearing Permit is required for any tree removal or site alteration. If tree removal is authorized as a condition of an approved Site Plan Agreement, the exemption under Section 3.1(d) of the By-law may apply and the permit requirement can be reassessed at that time.

Landscape Plan (MSLA, Feb. 2026) Technical Comments:

1. One (1) non-native species is listed on the Landscape Plan which should be replaced with native species. Proposed native species substitutions are provided below. The Landscape Plan species list should be revised accordingly.

Non-Native Landscape Species	Status	Suggested Native Alternatives
Dwarf Mugo Pine	Nonnative	Dwarf Eastern White Pine (<i>Pinus strobus</i> 'Nana' or 'Blue Shag') Dwarf Eastern White Cedar (<i>Thuja occidentalis</i> cultivars) Dwarf White Spruce (<i>Picea glauca</i> 'Echiniformis')

We trust this assists the Township in developing the next steps regarding this application.

Sincerely,



Summer Graham, B.Sc., Eco.Mgmt. Tech., ISA
Ecologist - Restoration



Todd Fell, OALA, CSLA, CERP
Principal, Manager of Landscape Architecture





02/27/2026

Memorandum

To: Monika Farncombe - Planning and Corporate Services Coordinator

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

**RE: 7456 Mclean Road West, Township of Puslinch
Zoning By-Law Amendment Application**

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 request that the owners or their agents submit the following plans, reports or documentation to the satisfaction of the Township Risk Management Official during the **Site Plan** process:

1. A Winter Maintenance Plan including, but not limited to, how salt is applied and stored on the property, snow clearing procedures, details regarding winter maintenance contracts, and contractor and/or employee training procedures. Please see attached Appendix C - Guidance Documents for additional information on Winter Maintenance Plans.
2. A liquid fuel handling, storage and spill response procedure for construction and site operation;
3. That there be further discussion with the Township Hydrogeologist regarding the proposed LID measures and the groundwater recharge deficit;
4. Documentation that a flow meter will be installed, and its data will be available upon request for review by the Township and Risk Management Office;
5. Documentation that the monitoring wells and unused well on the property are decommissioned as per *Ontario Regulation 903*;
6. Documentation of the Environmental Compliance Approval for Sewage Works, once available.

The applicant has acknowledged the above requirements and noted that they will be provided during the Site Plan process. Documentation 5 and 6 has been noted by the applicant and are provided here for reference.



Report: **Hydrogeological Investigation Report**, dated February 2026, from C.F. Crozier and Associates:

The comments below have been acknowledged, and it is understood that they will be further reviewed during the Site Plan process. The comments remain for reference.

- It should be noted that the 'Activities of Concern for Source Water Protection' are briefly discussed in the mentioned report. Please provide more detailed plans/procedures as requested in Conditions 1. and 2. above. Please ensure the spill response procedure discusses the procedure for both small and large fuel spills.
- Regarding site vulnerability, the mentioned report indicates that there are no specific policies that apply as it relates to Source Water Protection. As noted, the site is located within a Significant Groundwater Recharge Area, and it is also located within a draft Wellhead Protection Area for Quantity. Although the WHPA-Q is still in draft form, once approved, there will be legally binding policies that will apply. As noted by the Township Hydrogeologist, we also strongly recommended that the WHPA-Q policies listed in the Grand River Source Protection Plan be adhered to as part of this development. Please discuss these policies and how they will be implemented, during the Site Plan process.

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

Sincerely,



Feb 27, 2026

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

Resources: [Appendix C: Guidance Documents](#)



SALVINI
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Transportation Engineering and Planning

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February 27, 2026

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

Re: D11-DAA, Roll Number – 2301000006119900000
3rd Submission Zoning By-law Amendment Application
7456 McLean Road West
Township Transportation Peer Review

Dear Monika,

I've reviewed the February 2026 Transportation Impact Study (TIS) prepared by Crozier for the site noted above as part of the ongoing review of the planning applications for the site including the Zoning By-law Amendment application. The study was updated after we provided comments in September of 2025. Many of my comments have been addressed; my updated comments are as follows and need to be addressed as part of the Zoning By-law Amendment application:

- The site traffic generation has been updated for eight vehicle fuelling positions at the gas bar as confirmed by the TIS and the site plan and is acceptable.
- The pass-by traffic has been updated. There is still a small discrepancy between the numbers in the report and the turning movement diagrams in the PM peak hour, but the discrepancy is not enough to change the recommendations of the study. The future total traffic volumes match the turning movement diagrams and I accept them for analysis purposes.
- The future total analysis suggests that the traffic can be accommodated at the Brock/McLean intersection with changes to the signal timing. I defer to the County to comment on whether or not the signal timing changes can be accommodated.
- The consultant confirmed 95th percentile queues at the Brock/McLean intersection using the Synchro methodology as requested. The analysis confirms that 95th percentile queues can generally be accommodated in the available storage for each of the auxiliary turn lanes in the study area.
- The study includes several diagrams that illustrate the paths of various vehicles throughout the site. It appears that the design vehicles are able to access and circulate the site appropriately. There is a truck scale on the site – I would like to have more information about how the scale operates and see a diagram showing how a truck

would use the scale and also fuel to confirm there is appropriate room on-site for that circulation pattern if it is needed. ***This comment has not been addressed. It is not clear how a truck would use both the scale and refuel or if that is not a requirement.***

- The survey data collected at the two proxy sites supports the 14 stacking/queuing spaces that have been proposed for the drive-thru restaurant. In addition, the site has been redesigned so that the entry to the drive-thru is further from the Brock Road driveway. The 14 stacking/queuing spaces are acceptable.
- The study provides some high level rationale for a parking provision that is seven (7) spaces less than what is required in the Township Zoning By-law along with proxy survey data for two comparable sites. One of the sites in Brantford found a parking demand that is less than the parking proposed for the site and the other site in Kitchener found a parking demand that was more. The proxy data was not factored by the consultant to the floor area of the site, but that does not change the results. The consultant discounted the Kitchener results because it is a multi-use site. I am very familiar with the Kitchener site. There is not any parking demand spilling over from adjacent uses. Moose Winooski's has access to a large parking lot and only the back service door faces the McDonald's and can only be opened from the inside. The data does not support the parking variance that the applicant is proposing, in my opinion. In addition, there appears to be room on the site to accommodate the seven spaces that are needed to meet the Zoning By-law requirements. The drive aisles are wide and there is space around the areas where the service vehicles have been shown to circulate. It appears there is room near the loading space adjacent to convenience store and/or the area identified for snow storage for additional passenger car parking to be provided.
- The consultant previously provided information about sight distance at the proposed driveway connection to McLean Road West stating that there is more than 200 metres of sight distance in both directions. The assessment was updated in this report to suggest that only 145 metres of sight distance is available to the right (for the left turn out movement). There is adequate sight distance to the left looking toward Brock Road where traffic is also moving more slowly coming from the intersection. To the right, both cars and trucks need to be able to see oncoming traffic to make a safe left turn out. The consultant should confirm on a drawing what the available sight distance is for a passenger vehicle and for the design truck for the left turn from stop condition in the TAC manual – the passenger vehicle has a shorter intersection sight distance requirement but also a lower eye height. Both need to be illustrated on separate drawings for submission. The consultant is encouraged to reach out and confirm the approach to assessing sight distance with me.

These comments could be addressed either in an addendum or an update the study. I'm open to discussing my comments with the consultant if that would be helpful.



In terms of deeming the application complete, I offer the following:

1. **Application Support** – I'm not yet prepared to support the application.
2. **If you support the application** – n/a
3. **If you cannot support the application** – I need to see the additional information and review it.
4. **Technical Items** – additional technical information has been requested to support both the Zoning By-law Amendment and Site Plan applications.

Please let me know if there is anything further to discuss on this application or if you have any further questions.

Sincerely,



Julia Salvini, MEng, PEng, FITE
President

Cc: Jeremy Tran, NPG Planning
Pasquale Constanzo, Wellington County





COUNTY OF WELLINGTON

PLANNING AND DEVELOPMENT DEPARTMENT
ALDO SALIS, BES, M.Sc. MCIP, RPP, DIRECTOR
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ADMINISTRATION CENTRE
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GUELPH, ON N1H 3T9

March 6th, 2026

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

Dear Ms. Farncombe :

**Re: Notice of Complete Application and Public Information Session and Third Submission
Proposed Zoning By-law Amendment D14-DAA
DAAZ Inc. Rear Part Lot 25, Concession 7 RP 61R7239 PARTS 1 & 2; and RP 61R4472 PART 2
7456 Mclean Road West & 197 Brock Road South
Township of Puslinch**

Thank you for circulating the Notice of Complete Application & Public Information Session and Third Submission for the above noted application. We have reviewed the application and provide the following comments for the Township's consideration.

The intent of the application is to rezone the subject lands from Site Specific Industrial 54 (IND(sp54)) and Holding Industrial (IND(h5)) to a site-specific Highway Commercial (HC(spXX)) to facilitate the development of a multi-tenant development. It is understood that the development is proposing to include a convenience store, drive-thru restaurant, 4 double sided pump car gas bar for motor vehicles, a 6 pump truck gas bar, truck scale, and a total of 50 parking spaces and 1 loading space with accesses from Brock Rd S and McLean Rd W.

It is noted that since the Planning Justification Report (PJR) was submitted for this development dated September 20, 2023 the Provincial Planning Statement (2024) came into effect on October 20, 2024. The Provincial Planning Statement (PPS) included changes to the definition and policies applicable to Employment Areas. It is noted the definition for Employment Areas excludes uses including institutional and commercial, including retail and office not associated with the primary employment use. It is acknowledged that the applicant has submitted an Addendum to the PJR dated February 13, 2026 prepared by W.E. Oughtred and Associates Inc. within the third submission. The Township will need to be satisfied that the proposed uses on the subject lands are consistent with the definition of Employment Area and policies regarding Employment Areas within the PPS.

The subject lands are identified as Rural Employment Area, Policy Area PA7-1 Puslinch Economic Development Policy Area and are located within the Paris and Galt Moraine Policy Area and the Mill Creek Watershed within the County of Wellington Official Plan. Section 6.8 Rural Employment Areas is applicable to the subject lands and directs that in all cases rural employment areas will be used by 'dry' industrial and limited commercial uses which do not use significant amounts of water in their operation, and which do not produce significant amounts of effluent,



COUNTY OF WELLINGTON

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ADMINISTRATION CENTRE
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consistent with rural servicing. Section 6.8.2 provides permitted uses including dry industrial and commercial uses. It is noted that Official Plan Amendment (OPA) 123 received Provincial Approval and came into effect on September 3, 2025. OPA 123 added a new definition for Employment Area to the Official Plan and new policies to the Rural Employment Area sections of the Official Plan to address the definition change of 'Area of Employment' under the Planning Act and to align with the PPS. It is suggested that the applicant update the PJR addendum letter submitted to review the updates and conformity with the Official Plan. It is noted that additional applicable sections of the Official Plan Applicable include, but are not limited to, Policy Area PA7-1 Puslinch Economic Development Area, section 9.8.3 Puslinch Industrial Policy, section 9.8.4 Regionally Significant Economic Development Study Area, section 11.2.6 Rural System Servicing, section 4.9.7 Paris and Galt Moraine Policy Area, and 4.10.1 Mill Creek Watershed. Section 9.8.1 provides policies for Wellington Rd 46. It is understood from the Traffic Impact Study that partial access (right-in, right out access) is proposed on Brock Rd. It is understood the TIS has been provided to County Roads for review, and their comments will be provided under a separate cover. Any comments received from the County Roads Department should be addressed. The Township will need to be satisfied that the proposal conforms to the policies of the County of Wellington Official Plan.

It is noted that the subject property is located within a Wellhead Protection Area Q1 and Q2, and comments provided by Wellington Source Water Protection should be addressed.

The Township will need to be satisfied that the proposal and proposed by-law is consistent with the Provincial Planning Statement and conforms to the County of Wellington Official Plan.

It is noted that the application appears to be for two separate lots. County Planning Staff is seeking clarification if it is the applicant's intent to merge the parcels or whether this will be a requirement of the Township?

If Council approves this amendment, we would appreciate a copy of the notice of passing, amending by-law and affidavit documents for our files.

Yours truly,

Joanna Henderson, RPP MCIP
Senior Planner



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MEMORANDUM

TO: Monika Farncombe, Planning and Corporate Services Coordinator – Township of Puslinch

FROM: Brittany Boomer, Infrastructure Technical Analyst – County of Wellington

RE: D14-DAA – 7456 McLean Road West, Puslinch (DAAZ Inc.)

DATE: March 9, 2026

Wellington County Roads has reviewed the supplied documents for the above noted Zoning Bylaw Amendment request.

Centreline Median & Brock Road South Entrance

Wellington County Roads requires that the centreline median from the McLean Road intersection be extended past the proposed entrance on Brock Road South. An application for any entrance on Brock Road South must be submitted to Wellington County through the website: [Roads Policies & Permits | Roads](#).

The requirement was provided at the site plan application (D11-DAAZ) process and can be completed as a condition of the site plan agreement

Wellington County Roads requests Notice of Decision.

Sincerely,



Brittany Boomer
Infrastructure Technical Analyst

March 9, 2026
GEI Project No. 2402596/123006-031

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

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

Re: ZBA 3rd Submission
7456 McLean Road West and 197 Brock Road South
Puslinch, ON

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed a third submission for Zoning By-Law Amendment for a proposed development on the subject lands located at 7456 McLean Road West and 197 Brock Road South in the Township of Puslinch. The third submission was received on February 19, 2026.

It is our understanding that the proposed development includes a one-storey convenience store, a one-storey drive-thru restaurant, a 4 double-sided pump car gas bar, a 6-pump truck gas bar, 44 parking spaces and 6 transport truck parking spaces. The site will be accessed from McLean Road West and Brock Road South.

A previous Zoning By-Law Amendment application submission was received on August 8, 2025, and was reviewed by GEI for completeness on August 26, 2026, with technical comments provided on October 1, 2025.

1. Documents Received

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

- Cover Letter, prepared by C.F. Crozier and Associates Inc, dated February 13, 2026.
- Comment Response Letter, prepared by W.E. Oughtred and Associated Inc., dated February 13, 2026.
- Topographic Survey, prepared by Tarasick McMillan Kubicki Limited, dated November 3, 2022.
- Geotechnical Investigation, prepared by CMT Engineering Inc., dated July 13, 2023.

- Hydrogeological Investigation Report, prepared by C.F. Crozier and Associates Inc., dated February 2026.
- Functional Servicing and Stormwater Management Report, prepared by C.F. Crozier and Associates Inc., dated February 2026.
- Preliminary Erosion, Sediment Control and Removals Plan, Drawing C101, Revision 3, prepared by C.F. Crozier and Associates Inc., dated February 13, 2026.
- Preliminary Site Grading Plan, Drawing C102, Revision 3, prepared by C.F. Crozier and Associates Inc., dated February 13, 2026.
- Preliminary Site Servicing Plan, Drawing C103, Revision 3, prepared by C.F. Crozier and Associates Inc., dated February 13, 2026.
- Preliminary Pre-Development Drainage Plan, Drawing Fig 1, Revision 3, prepared by C.F. Crozier and Associates Inc., dated February 13, 2026.
- Preliminary Post-Development Drainage Plan, Drawing Fig 2, Revision 3, prepared by C.F. Crozier and Associates Inc., dated February 13, 2026.
- Preliminary Storm Sewer Drainage Plan, Drawing Fig 3, Revision 3, prepared by C.F. Crozier and Associates Inc., dated February 13, 2026.
- Site Plan, Drawing A101, Revision 4, prepared by Richard Ziegler Architect Inc., dated February 11, 2026.
- Electrical Drawings E-01 to E-03, Revision 2, prepared by Spline, dated January 27, 2024.

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

- Draft Zoning By-law Amendment.
- Addendum to Planning Justification Report, prepared by W.E. Oughtred and Associated Inc., dated February 13, 2026.
- Transportation Impact Study, prepared by C.F. Crozier and Associates Inc., dated February 2026.
- Tree Inventory Protection Plan and Drawing, Revision 4, prepared by Kuntz Forestry Consulting Inc., dated February 11, 2026.
- Woodland Designation Assessment, Revision 4, prepared by Kuntz Forestry Consulting Inc., dated February 11, 2026.
- Landscape Drawings L1-01 and LD-01, Revision 3, prepared by Marton Smith Landscape Architects, dated February 19, 2026.
- Landscape Cost Estimate, prepared by Marton Smith Landscape Architects, dated February 19, 2026.
- Planning Justification Report, prepared by Siv-ik Planning/Design Inc., dated September 20, 2023.
- Floor Plans, Drawing A102, Revision 2, prepared by Richard Ziegler Architect Inc., dated February 11, 2026.

- Roof Plans, Drawing A103, Revision 2, prepared by Richard Ziegler Architect Inc., dated February 11, 2026.
- Building Elevation Drawings A201 to A204, Revision 2, prepared by Richard Ziegler Architect Inc., dated August 8, 2025.
- Rendered Views, Drawing A205, Revision 1, prepared by Richard Ziegler Architect Inc., dated February 11, 2026.
- Pump Plans, Drawing A206, Revision 1, prepared by Richard Ziegler Architect Inc., dated February 11, 2026.

2. Additional Documents Required

The documents provided as part of this submission are sufficient to support a complete application for Zoning By-law Amendment.

To support a Site Plan Approval application, the following additional items will be required:

- Spills Management Plan.
- Itemized Construction Cost Estimate for Site Servicing, which includes 15% for engineering and contingencies.

3. Technical Comments

Based on our review of documents identified in Section 1, we provide the following technical comments to be addressed prior to zoning bylaw amendment approval. Some items have been deferred to Site Plan Approval as noted.

3.1. Deficiencies/Outstanding Matters

No.	Matter	Document	Comment
13.	Barrier Free Spaces	Site Plan and Site Grading Plan	<p><u>GEI Comment (September 15, 2025)</u> Please show details for the barrier free spaces, including tactile plates, signage and appropriate grades from parking spaces to building entrance.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged. Tactile plates, signage and detailed grading will be provided at detailed design stage.</p> <p><u>GEI Comment (March 9, 2026)</u> "Type A" spaces are shown to be 3.0m wide. Per Township Zoning By-law, barrier free spaces shall be 3.6m wide. Also, the access aisles are shown to be 1.5m wide. Per County standards, access aisles shall be 2.0m wide. Proposed grades around the barrier-free spaces for the restaurant appear to result in slopes up to 5.6%. Per County standards, maximum running slope is 1.5% and max cross slope is 1% for</p>

No.	Matter	Document	Comment
			<p>accessible parking spaces. Please review and revise accessible parking space widths and grades.</p> <p>Tactile plates and signage to be reviewed at the time of site plan approval.</p>
16.	Grading and Retaining Walls	Grading Plan	<p><u>GEI Comment (March 9, 2026)</u> The grading plan shows a “50.8%” slope against the eastern property limit at the end of the drive-through. Maximum slope without retaining walls is 3:1 per Township standards.</p> <p>Additionally, the retaining walls adjacent to the septic beds are shown to be only 0.3m in width while the height almost reaches 4m. If wider retaining walls are required, some of the asphalt area will be lost and vehicle maneuvering could be impacted (specifically the WB-20 truck).</p>

3.2. Completed/Approved Matters

The following comments have been addressed.

No.	Matter	Document	Comment
1.	Storm Sewer Design Sheet	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u> Please provide a storm sewer design sheet for all on-site storm sewer. Please demonstrate that the storm sewer is able to convey the 100-year design storm, as the underground storage tank is sized for the 100-year event.</p> <p><u>Crozier Response (February 13, 2026)</u> A storm sewer design sheet has been prepared and storm sewers have been sized to convey the 5-year design storm as per Township of Puslinch standards. Flows exceeding the capacity of the pipe will be conveyed overland towards the CBs on top of the tank which have adequate inlet capacity to drain the flows from the 100-year design storm into the tank. Refer to detailed calculations provided in Appendix E.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment at this stage.</p>
2.	Regional Storm	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u> Please ensure that the Regional event (Hurricane Hazel) can be conveyed safely to the proposed major storm outlets.</p> <p><u>Crozier Response (February 13, 2026)</u> The Regional event will be conveyed off our site and will follow the proposed emergency overland flow route outlined on the proposed grading plan (drawings C102). Refer to</p>

No.	Matter	Document	Comment
			<p>section 8.3.2 of the report for more information about the conveyance of the regional event.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment.</p>
3.	Advanced Treatment System	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u> The report indicates that design of the wastewater treatment system will be completed during detailed design systems. Please provide this design for future site plan submissions.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment acknowledged.</p> <p><u>GEI Comment (March 9, 2026)</u> Design of wastewater treatment system to be reviewed at time of site plan approval.</p>
4.	Discharge of Stormwater to 7434 McLean Road West	N/A	<p><u>GEI Comment (September 15, 2025)</u> Prior to site plan approval, written permission should be obtained from the Owner of the Wheel King Trans Haul Inc. Site (7434 McLean Road West) for discharge of post-development stormwater to the property from catchment 201.</p> <p><u>Crozier Response (February 13, 2026)</u> Letter to neighbouring property has been provided to Owner. Property Owner to provide letter of approval prior to site plan approval.</p> <p><u>GEI Comment (March 9, 2026)</u> Written permission from adjacent property required prior to site plan approval.</p>
5.	Geotechnical Report	N/A	<p><u>GEI Comment (September 15, 2025)</u> Please provide the Geotechnical Report prepared by CMT and dated July 2023.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment acknowledged.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment at this stage.</p>
6.	Time to Peak	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u> The times to peak in Tables 6 and 7, and used in the Visual OTTHYMO model, do not match those calculated using the Airport Method in Appendix E.</p> <p><u>Crozier Response (February 13, 2026)</u></p>

No.	Matter	Document	Comment
			<p>Inconsistencies have been addressed in the report and Appendix E. Note a minimum time to peak of 10 minutes (0.17 hrs) was used in the model.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment.</p>
7.	Curve Numbers	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u> There are some discrepancies between the Curve Numbers outlined in the report and those used in the Visual OTTHYMO model.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged. Curve Numbers have been updated for consistency. Please note that CN values are converted to CN* values as per typical practice within southern Ontario. This results in slightly different CN values in the model than what is represented in the report.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment.</p>
8.	Minor Errors	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u></p> <ol style="list-style-type: none"> a. The curve number for catchment 203 in Table 7 should be 69 not 59. b. The number of units in row 1 of Table 3 should be 235 not 238. c. The total flows in Table 3 sum to 19,475 L/day and not 18,300 L/day. d. Section 3.0 could be updated to reference additional groundwater measurements taken since April 2023. e. The first paragraph of Section 8.3 references an infiltration deficit of 1935 m³/year and 62 mm/year. These values should be 1985 m³/year and 123 mm/year. The text in the Hydrogeological Report should also be updated. All tables appear to be up to date. <p><u>Crozier Response (February 13, 2026)</u></p> <ol style="list-style-type: none"> a. Comment Acknowledged. b. Comment Acknowledged. c. Please note the or in row 1. The total flow includes the largest of the two flows per the Ontario Building Code. d. Updates provided to Section 3.0. Refer to the Hydrogeological Investigation Report for additional details and analyses regarding onsite hydrogeological conditions. e. Comment Acknowledged.

No.	Matter	Document	Comment
			<p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment at this stage.</p>
9.	Jellyfish Unit	Functional Servicing and Stormwater Management Report and Site Servicing Drawing	<p><u>GEI Comment (September 15, 2025)</u> Sizing and details of the Jellyfish unit should be provided for future site plan submissions.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged. Jellyfish unit to be sized at detailed design.</p> <p><u>GEI Comment (March 9, 2026)</u> Sizing of jellyfish unit to be reviewed at time of site plan approval.</p>
10.	Erosion and Sediment Control for Roadside Ditch	Erosion, Sediment Control and Removals Plan	<p><u>GEI Comment (September 15, 2025)</u> The County should confirm what additional protections are needed for the roadside ditches during construction.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment at this stage.</p>
11.	Infiltration Gallery	Site Servicing Plan	<p><u>GEI Comment (September 15, 2025)</u> Please provide details for the infiltration gallery on the Site Servicing Plan, including elevations and depth to seasonal high groundwater level.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged. Please refer to the servicing and grading plans (Drawings C102 and C103) for details on the proposed infiltration gallery including elevations and groundwater separation.</p> <p><u>GEI Comment (March 9, 2026, 2026)</u> The infiltration gallery section provided on drawing C103 indicates only 0.15m cover. Ideally, there should be 1.2m frost cover. Fortunately, groundwater appears to be quite deep so this should not be an issue. Further details for the infiltration gallery should be provided at the time of site plan approval, including inspection/cleanout port(s), and overflow.</p>
12.	Truck Turning Plans	Transportation Impact Study	<p><u>GEI Comment (September 15, 2025)</u> The vehicle maneuvering analysis for waste collection does not appear to show the correct garbage pickup location. Please update.</p>

No.	Matter	Document	Comment
			<p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged. See updated maneuvering diagrams.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment at this stage.</p>
14.	Driveway Culvert	Site Servicing Plan	<p><u>GEI Comment (September 15, 2025)</u> Please increase the size of the driveway culvert to at least 400 mm diameter, per Township standards.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged.</p> <p><u>GEI Comment (March 9, 2026)</u> Acknowledged. No further comment at this stage.</p>
15.	Maintenance	Functional Servicing and Stormwater Management Report	<p><u>GEI Comment (September 15, 2025)</u> Please add a section to the report to discuss required ongoing maintenance of stormwater management infrastructure, including required frequency of inspection and maintenance tasks.</p> <p><u>Crozier Response (February 13, 2026)</u> Comment Acknowledged. Operation and maintenance section of SWM tank and Jellyfish unit will be provided at detailed design.</p> <p><u>GEI Comment (March 9, 2026)</u> Operation and Maintenance of stormwater management infrastructure to be reviewed as part of site plan approval.</p>

3.3. Additional Commentary

The following comments are provided for consideration.

No.	Matter	Comment
i.	McLean Road West Updates	<p><u>GEI Comment (September 15, 2025 and March 9, 2026)</u> Pending comments from the County Road Department and Township's Traffic Consultant, road widening of McLean Road may be required to allow for future intersection upgrades. In addition, changes to the gravel shoulder along McLean Road may be required to allow for pedestrian access from future industrial developments to the proposed restaurant. Additional discussion and coordination may be required.</p>

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