
Stovel and Associates Inc.
Planners, Agrologists and Environmental Consultants

July 29, 2026

Township of Puslinch
C/O Ms. Monika Farncombe
7404 Wellington County Road 34
Puslinch, ON
N0B 2J0

RE: Proposed Arkell Development – Response to NPG Planning Solutions (June 19, 2026)
605 Arkell Road and Part of Lots 7, 8, 9
Concession 10
Township of Puslinch
County of Wellington

Dear Ms. Farncombe:

Please find attached our response to the comments raised by NPG Planning Solutions (“NPG”).

Table 1 sets out the comments from NPG. The structure of the table generally follows the format provided in the NPG comment letter (dated June 19, 2026).

Comment #	NPG Comment	SAI Response	Result
Starting on Page No. 2 – Comments 3 b) Timeline	Please advise the timeline of the other applications.	The documentation for the OPA was submitted to the County, declared complete and the signs have been posted. We will wait for the comments on the zoning application (i.e. EIS comments), before we prepare the updated Draft Plan of Subdivision.	
3. c) Matrix Needed	Please provide comments matrix addressing our comments in the next submission.	Please accept this table as our response matrix on planning matters.	

3. d) 605 Arkell Road	Please advise the timing and proposed process to sever this portion. We note that the retained portion of this property is not proposed to be part of the hamlet expansion.	The OPA application includes all of 605 Arkell Road. At this point, we anticipate that the severance process won't happen until after the lands in question are included in the Hamlet.	
3. e) Zoning Matrix – 605 Arkell Road	Please provide a zoning matrix for the retained portion of 605 Arkell Road and the lands identified as "Lands excluded from development" to verify compliance with the Agricultural and Hamlet Residential zones.	Understood. See attached.	See attached zoning matrix.
3. f) Draft Zoning – suggested modifications or clarification required	i) Draft ZBA includes a range of uses not illustrated on the Concept Plan – home business, ARU's. Update the Concept Plan to reflect these uses or remove them from requested uses. ii) Clause 6 may not be necessary.	The home business and ARU can be contained within the primary unit. We don't think modifications to the Concept plan are needed. Regarding, Clause 6, we will take that under advisement.	
3. g) Concept Plan clarification.	Detailed comments regarding Blocks 46-49, the retained portion of 605 Arkell and lands immediately south of Block 44. The Concept Plan should demonstrate the current uses of adjacent lands and the width of abutting Roads.	Items i) – iii) inclusive will be addressed at the Draft Plan of Subdivision Stage. The Concept Plan has been revised to show the current uses of adjacent lands and width of abutting roads.	See attached the revised Concept Plan.

	Clarify the use of the strip of lands immediately abutting Watson Road South. The Concept Plan may need to be updated (additional comments on EIS and Noise Study). 4.26.1 of the ZB prohibits grading or landscaping (exceeding 0.6 m) within sight triangles. The sight triangle is 46 m	The strip of land immediately abutting Watson Road South is intended to accommodate an anticipated future road widening. The precise width and extent of the road widening will be determined through the Draft Plan of Subdivision process in consultation with the applicable road authority. The Concept Plan will be labelled accordingly. Understood. The Township Noise consultant is satisfied with the HGC submission. SAI requested input from Crozier on this matter. Crozier confirmed that a 46m sight triangle is not required.	
3. h) Comments about the Noise and Vibration Feasibility Study	i) and II) detailed comments on the Noise Study. iii) ensure the extent of the subject lands aligns with the area addressed by HGC. iv) Front yard setback is 3 m in the draft ZBA but the HGC Study assumed 6 m v) Confirm the 2.7 m acoustic barrier for Lot 1 is located outside the sight triangle or apply for zoning relief (4.26). vi) Please review and incorporate the NVFS	We have sent your comments to HGC and await their input.	

	recommendations in the ZBA as appropriate.		
3. i. – iii. MDS	i. MDS is still required for the balance of lands proposed for rezoning. ii. MDS I setback for Farm 3 appears to impact the Subject Land. iii. AIA includes MDS Analysis. NPG will review this.	It is agreed that MDS applies to much of the land proposed to be developed. The MDS I arc for Farm 3 affects a small portion of the site that is not proposed for residential development. A house would not be developed in this area as it is too close to the railroad. Yes, the AIA provides an overview of the MDS Analysis. Please do not hesitate to contact SAI should you have any concerns or questions regarding MDS.	
3. j. EIS	EIS to be reviewed by Township's ecologist and NPG to ensure consistency with PPS and conformity to County OP policies.	Understood.	
3. k. More detailed Comments in future	More detailed technical comments will be provided once the application has been deemed complete and circulated for technical review.	Understood.	
3. l. Parkland Dedication and Development Charges	Parkland dedication and DC's may be required.	Understood.	
3. m. Additional information	Site Plan and Drawing Requirements and Municipal Development Standards	Understood.	

We trust that you will find these comments to be of assistance.

Yours truly,

Robert Stovel

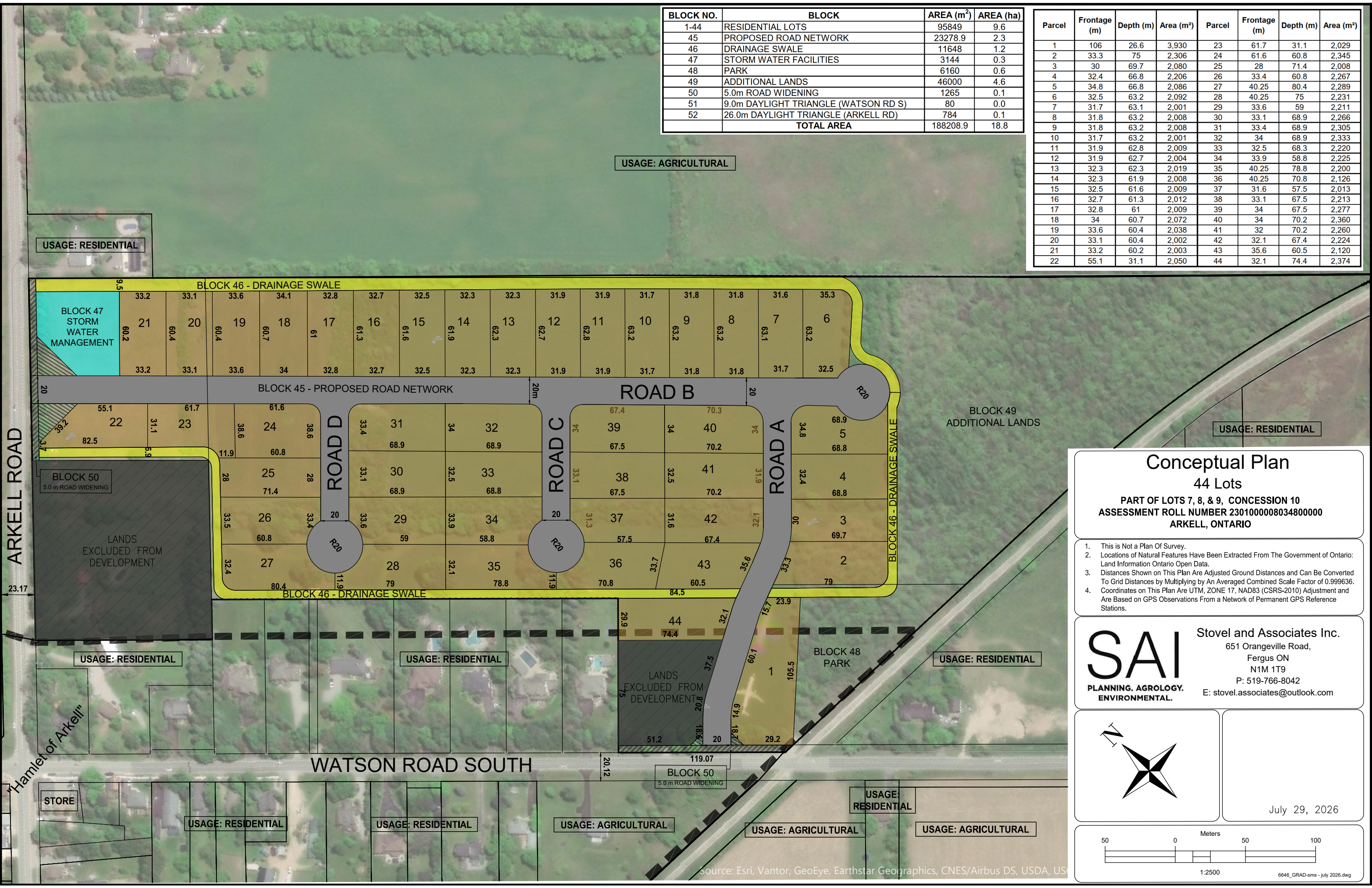
Robert P. Stovel, M.Sc., M.C.I.P., R.P.P., P. Ag.

Zoning matrix — Retained portion of 605 Arkell Road (Lands Excluded from Development)

Zoning provision	Reduced Lot A Zone requirement	Proposed/Provided	Compliance
Proposed zone	Agricultural (A)	Agricultural (A)	Yes
Minimum lot area	0.4 ha	1.62 ha	Yes
Minimum lot frontage	25 m	130 m	Yes
Minimum front yard	7.5 m	42 m	Yes
Minimum interior side yard	3 m	3 m	Yes
Minimum exterior side yard	7.5 m	N/A	N/A
Minimum rear yard	7.5 m	75 m	Yes
Maximum lot coverage	30%	< 5%	Yes

BLOCK NO.	BLOCK	AREA (m ²)	AREA (ha)
1-44	RESIDENTIAL LOTS	95849	9.6
45	PROPOSED ROAD NETWORK	23278.9	2.3
46	DRAINAGE SWALE	11648	1.2
47	STORM WATER FACILITIES	3144	0.3
48	PARK	6160	0.6
49	ADDITIONAL LANDS	46000	4.6
50	5.0m ROAD WIDENING	1265	0.1
51	9.0m DAYLIGHT TRIANGLE (WATSON RD S)	80	0.0
52	26.0m DAYLIGHT TRIANGLE (ARKELL RD)	784	0.1
TOTAL AREA		188208.9	18.8

Parcel	Frontage (m)	Depth (m)	Area (m ²)	Parcel	Frontage (m)	Depth (m)	Area (m ²)
1	106	26.6	3,930	23	61.7	31.1	2,029
2	33.3	75	2,306	24	61.6	60.8	2,345
3	30	69.7	2,080	25	28	71.4	2,008
4	32.4	66.8	2,206	26	33.4	60.8	2,267
5	34.8	66.8	2,086	27	40.25	80.4	2,289
6	32.5	63.2	2,092	28	40.25	75	2,231
7	31.7	63.1	2,001	29	33.6	59	2,211
8	31.8	63.2	2,008	30	33.1	68.9	2,266
9	31.8	63.2	2,008	31	33.4	68.9	2,305
10	31.7	63.2	2,001	32	34	68.9	2,333
11	31.9	62.8	2,009	33	32.5	68.3	2,220
12	31.9	62.7	2,004	34	33.9	58.8	2,225
13	32.3	62.3	2,019	35	40.25	78.8	2,200
14	32.3	61.9	2,008	36	40.25	70.8	2,126
15	32.5	61.6	2,009	37	31.6	57.5	2,013
16	32.7	61.3	2,012	38	33.1	67.5	2,213
17	32.8	61	2,009	39	34	67.5	2,277
18	34	60.7	2,072	40	34	70.2	2,360
19	33.6	60.4	2,038	41	32	70.2	2,260
20	33.1	60.4	2,002	42	32.1	67.4	2,224
21	33.2	60.2	2,003	43	35.6	60.5	2,120
22	55.1	31.1	2,050	44	32.1	74.4	2,374



USAGE: AGRICULTURAL

USAGE: RESIDENTIAL

USAGE: RESIDENTIAL

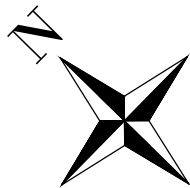
Conceptual Plan 44 Lots

PART OF LOTS 7, 8, & 9, CONCESSION 10
ASSESSMENT ROLL NUMBER 2301000008034800000
ARKELL, ONTARIO

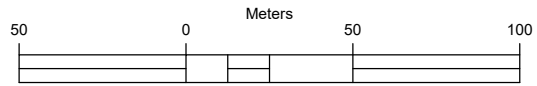
1. This is Not a Plan Of Survey.
2. Locations of Natural Features Have Been Extracted From The Government of Ontario: Land Information Ontario Open Data.
3. Distances Shown on This Plan Are Adjusted Ground Distances and Can Be Converted To Grid Distances by Multiplying by An Averaged Combined Scale Factor of 0.999636.
4. Coordinates on This Plan Are UTM, ZONE 17, NAD83 (CSRS-2010) Adjustment and Are Based on GPS Observations From a Network of Permanent GPS Reference Stations.

SAI
PLANNING. AGROLOGY.
ENVIRONMENTAL.

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Fergus ON
N1M 1T9
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July 29, 2026



1:2500

6646_GRAD-rms - july 2026.dwg

Source: Esri, Vantor, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, US

Plant Type ¹	Scientific Name	Common Name	CC ²	CW ³	SCA ⁴ Status	SARA ⁵ Status	Global ⁶ Rank	Prov. ⁷ Rank	Wellington County ⁸	ELC Community				
										CUM1-1	CUP2	CUP3	TAGM5a	TAGM5b
TR	<i>Acer negundo</i>	Manitoba Maple	0	0			G5	S5				✓		✓
TR	<i>Acer platanoides</i>	Norway Maple	*	5			GNR	SNA						✓
TR	<i>Acer saccharum</i>	Sugar Maple	4	3			G5	S5						✓
FO	<i>Achillea millefolium</i>	Common Yarrow	0	3			G5	SNA			✓			✓
FO	<i>Alliaria petiolata</i>	Garlic Mustard	*	0			GNR	SNA			✓	✓		✓
FO	<i>Arctium minus</i>	Common Burdock	*	3			GNR	SNA				✓		
GR	<i>Bromus erectus</i>	Meadow Brome	*	5			GNR	SNA		✓			✓	✓
FO	<i>Circaea canadensis ssp. Canadensis</i>	Broad-leaved Enchanter's Nightshade	2	3			GNR	S5			✓			
FO	<i>Clinopodium vulgare</i>	Field Basil	4	5			G5T5	S5			✓			
SH	<i>Cornus alternifolia</i>	Alternate-leaved Dogwood	6	3			G5	S5			✓			
GR	<i>Dactylis glomerata</i>	Orchard Grass	*	3			GNR	SNA		✓	✓		✓	✓
FO	<i>Daucus carota</i>	Wild Carrot	*	5			GNR	SNA						✓
FE	<i>Dryopteris carthusiana</i>	Spinulose Wood Fern	5	-3			G5	S5			✓			
VI	<i>Echinocystis lobata</i>	Wild Mock-cucumber	3	-3			G5	S5			✓			
FO	<i>Erigeron annuus</i>	Annual Fleabane	0	3			G5	S5		✓	✓		✓	
FO	<i>Erigeron philadelphicus</i>	Philadelphia Fleabane	1	-3			G5	S5			✓			
FO	<i>Fragaria virginiana</i>	Wild Strawberry	2	3			G5	S5			✓	✓		
TR	<i>Fraxinus americana</i>	White Ash	4	3			G5	S4			✓			✓
FO	<i>Galium aparine</i>	Cleavers	4	3			G5	S5			✓			
FO	<i>Geranium robertianum</i>	Herb-robert	2	3			G5	S5			✓	✓		✓
FO	<i>Geum aleppicum</i>	Yellow Avens	2	0			G5	S5			✓	✓		✓
FO	<i>Geum canadense</i>	White Avens	3	0			G5	S5			✓			
TR	<i>Juglans cinerea</i>	Butternut	6	3	END	END	G4	S2?	✓					✓
TR	<i>Juglans nigra</i>	Black Walnut	5	3			G5	S4?		✓	✓			✓
FO	<i>Leonurus cardiaca</i>	Common Motherwort	*	5			GNR	SNA				✓		
FO	<i>Leucanthemum vulgare</i>	Oxeye Daisy		5			GNR	SNA						✓
SH	<i>Lonicera sp.</i>	Honeysuckle species									✓		✓	
FO	<i>Maianthemum stellatum</i>	Star-flowered False Solomon's Seal	6	0			G5	S5			✓			
FO	<i>Medicago lupulina</i>	Black Medic	*	3			GNR	SNA			✓			
TR	<i>Ostrya virginiana</i>	Eastern Hop-Hornbeam	4	3			G5	S5						✓
VI	<i>Parthenocissus quinquefolia</i>	Virginia Creeper	6	3			G5	S4?		✓		✓	✓	✓
GR	<i>Phleum pratense</i>	Common Timothy	*	3			GNR	SNA		✓				
TR	<i>Picea abies</i>	Norway Spruce	*	5			G5	SNA					✓	
TR	<i>Picea glauca</i>	White Spruce	6	3			G5	S5			✓		✓	
TR	<i>Picea pungens</i>	Blue Spruce		3			G5	SNA				✓		
FO	<i>Pilosella aurantiaca</i>	Orange Hawkweed		5			GNR	SNA			✓			
FO	<i>Pilosella caespitosa</i>	Meadow Hawkweed		5			GNR	SNA		✓				✓
TR	<i>Pinus strobus</i>	Eastern White Pine	4	3			G5	S5		✓	✓			
TR	<i>Pinus sylvestris</i>	Scots Pine	*	3			GNR	SNA				✓		
FO	<i>Plantago major</i>	Common Plantain	*	3			G5	S5		✓				
GR	<i>Poa pratensis ssp. Pratensis</i>	Kentucky Bluegrass	0	3			G5T5	SNA		✓				✓
TR	<i>Populus tremuloides</i>	Trembling Aspen	2	0			G5	S5			✓			
TR	<i>Prunus serotina</i>	Black Cherry	3	3			G5	S5			✓			
SH	<i>Prunus virginiana</i>	Choke Cherry	2	3			G5	S5			✓			

Plant Type ¹	Scientific Name	Common Name	CC ²	CW ³	SCA ⁴ Status	SARA ⁵ Status	Global ⁶ Rank	Prov. ⁷ Rank	Wellington County ⁸	ELC Community				
										CUM1-1	CUP2	CUP3	TAGM5a	TAGM5b
FO	<i>Ranunculus acris</i>	Tall Buttercup	*	0			G5	SNA			✓			
SH	<i>Rhamnus cathartica</i>	Common Buckthorn	*	0			GNR	SNA			✓	✓	✓	✓
SH	<i>Ribes cynosbati</i>	Prickly Gooseberry	4	3			G5	S5			✓			
TR	<i>Robinia pseudoacacia</i>	Black Locust	*	3			G5	SNA		✓		✓		
SH	<i>Rubus idaeus ssp. Strigosus</i>	Wild Red Raspberry	2	3			G5T5	S5		✓				
SH	<i>Rubus occidentalis</i>	Black Raspberry	2	5			G5	S5		✓	✓			✓
FO	<i>Silene vulgaris</i>	Bladder Campion	*	5			GNR	SNA			✓			✓
FO	<i>Solidago flexicaulis</i>	Zig-zag Goldenrod	6	3			G5	S5			✓			
FO	<i>Solidago sp.</i>	Goldenrod species									✓			
FO	<i>Sonchus arvensis ssp. Arvensis</i>	Field Sow-thistle		3			GNRTNR	SNA						✓
SH	<i>Syringa vulgaris</i>	Common Lilac	*	5			GNR	SNA						✓
FO	<i>Taraxacum officinale</i>	Common Dandelion	*	3			G5	SNA		✓		✓	✓	✓
FO	<i>Thalictrum pubescens</i>	Tall Meadow-rue	5	-3			G5	S5			✓			
TR	<i>Thuja occidentalis</i>	Eastern White Cedar	4	-3			G5	S5						✓
TR	<i>Tilia americana</i>	American Basswood	4	3			G5	S5			✓	✓		
FO	<i>Tragopogon dubius</i>	Yellow Goat's-beard	*	5			GNR	SNA			✓			✓
FO	<i>Trifolium pratense</i>	Red Clover	*	3			GNR	SNA			✓			✓
FO	<i>Trifolium repens</i>	White Clover	*	3			GNR	SNA						✓
FO	<i>Trillium grandiflorum</i>	White Trillium	5	3			G5	S5			✓			
FO	<i>Verbascum thapsus</i>	Common Mullein	*	5			GNR	SNA						✓
FO	<i>Vicia cracca</i>	Tufted Vetch	*	5			GNR	SNA		✓				
FO	<i>Viola sororia</i>	Woolly Blue Violet	4	0			G5	S5			✓			
VW	<i>Vitis riparia</i>	Riverbank Grape	0	0			G5	S5		✓	✓			✓
1.	Plant Types: AL = Algae; FE = Fern; FO = Forb; GR = Grass; LC = Lichen; LV = Liverwort; MO = Moss; RU = Rush; SE = Sedge; SH = Shrub; TR = Tree; VI = Herbaceous vine; VW = Woody Vine													
2.	CC: Coefficient of Conservatism reflects a species' fidelity to a specific habitat. Range from 0 to 10; 10 = very conservative, not likely in disturbed habitats, 1 = least conservative, likely found in a broad range of habitat. * = value not assigned because they are non-native													
3.	CW: Coefficient of Wetness reflects a species' affinity for wet soil conditions. Range from -5 to 5; -5 = obligate wetland species, 5 = obligate upland species													
4.	SCA: Status under the Provincial Species Conservation Act, listed on the Protected Species in Ontario list. In order of severity, statuses include: EXP = Extirpated; END = Endangered; THR = Threatened; SC = Special Concern													
5.	SARA: Status under the National Species at Risk Act (SARA), assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). In order of severity, statuses include: EXP = Extirpated; END = Endangered; THR = Threatened; SC = Special Concern													
6.	Global rarity rank. Range from G1 to G5; G1 = Extremely rare, G5 = Very Common. NR = Unranked; U = Unrankable													
7.	Provincial rarity rank. Range from S1 to S5; S1 = Extremely rare, S5 = Very Common. NR = Unranked; U = Unrankable													
8.	Signifncant Plant List for Wellington County (Dougan & Associates, 2009)													

August 4, 2026

**Attn: Rob Stovel
Timberworx Custom Homes Inc.
#201 – 1 Queen Street North,
Kitchener, ON N2H 2G7**

Via Email: stovel.associates@outlook.com

**RE : Responses to Peer Review Comments for Arkell Subdivision, South of Arkell
Road and East of Watson Road South, Puslinch, ON
HGC Project #: 02600117**

Dear Rob,

As requested, please see HGC Noise Vibration Acoustics' responses to the latest peer review comments from NPG Planning Solutions Inc. dated June 19, 2026. HGC previously responded to comments from Trinity/Valcoustics on June 1, 2026, and Trinity/Valcoustics confirmed their agreement with HGC's responses in a letter dated June 18, 2026. The latest comments are presented below, with our responses provided in *italics*.

- i. There appear to be incorrect references in this study that should be updated. For instance, references of "Table 5" on page 12 and "0.18 mm/s at M2" on page 13 should have been "Table 6" and "0.18 mm/s at M3", respectively.

The references have been corrected throughout the report.

- ii. Please provide clarification why the outdoor landscape area noise receptors A_{OLA}, B_{OLA} and C_{OLA} are not located at the closest possible locations for outdoor landscape area on their respective lots relative from the railway. The same clarification is requested for D_{OLA} and E_{OLA} in relation from Arkell Road.

As per NPC-300, the outdoor living area assessment point is typically located 3 m from the building façade (at the rear of the dwelling), aligned with the midpoint of the subject façade. The setbacks of the proposed dwellings have not been determined; therefore conservative, assumptions have been made to represent the locations of the rear yards.

- iii. Figure 1 outlines the extent of the proposed development that is subject to the evaluation of this study and Figure 2 shows locations of potential noise receptors. This is, however, different from the extent of lands subject to the ZBA application as detailed in the schedule of the draft Zoning By-law. Please ensure alignment between the extent of the study area of the NVFS and the extent of lands subject to the proposed ZBA application;

The "conceptual 240 m² building envelope" indicated on the "Onside Sewage Servicing Schematic" drawing (attached) is preliminary. These are conceptual building envelopes and are not exact. The NVFS was completed based on a representative conceptual development scenario and is considered appropriate for evaluating the lands subject to the proposed ZBA application.

- iv. It is noted that the study assumed a front yard setback of 6 metres. However, the applicant is proposing a minimum front yard setback of 3 metres. Please confirm if the assumption needs to be revised to be consistent with the proposed provision of the Draft Zoning By-law.

The "conceptual 240 m² building envelope" indicated on the "Onside Sewage Servicing Schematic" drawing (attached) is preliminary. These are conceptual building envelopes and are not exact. Once final dwelling locations and setbacks are confirmed, the acoustic recommendations should be reviewed and refined as necessary.

- v. Part of the proposed 2.7-metre-high acoustic barrier for Lot 1 is located at the southwest corner of this lot. Please confirm that this barrier does not lie within the required sight triangle for this lot. Otherwise, either a zoning amendment to provide relief from section 4.26 of the Puslinch Zoning By-law or this recommendation should be revised to comply with the Zoning By-law; and

This 2.7 m high barrier for Lot 1 is not anticipated to be located within the required sight triangle. The acoustic barrier is expected to include a return to the dwelling façade, which can be configured to remain outside of the sight triangle while maintaining the required acoustic performance. As the conceptual plan and building setbacks are preliminary and subject to refinement through the detailed design process, the final location and configuration of the acoustic barrier should be confirmed once dwelling locations and setbacks have been finalized.

- vi. Please review and incorporate the recommendations of the NVFS into the draft Zoning By-law as appropriate.

This comment is acknowledged.

All other recommendations included in our previous report remain applicable. We trust the above is sufficient for your current purposes. If we can be of further assistance, please let us know.



August 4, 2026

**Best Regards,
Howe Gastmeier Chapnik Limited**

Elise Jaklic, B.Eng

Sheeba Paul, M.Eng, P.Eng

Limitations

This document was prepared solely for the addressed party and titled project or named part thereof and should not be relied upon or used for any other project without obtaining prior written authorization from HGC Noise Vibration Acoustics (HGC). Further, the input of content from any document produced by HGC or related HGC intellectual property into any Artificial Intelligence tool is expressly prohibited. HGC accepts no responsibility or liability for any consequence of this document being used for a purpose other than for which it was commissioned. Any person or party using or relying on the document for such other purpose agrees and will by such use or reliance be taken to confirm their agreement to indemnify HGC for all loss or damage resulting therefrom. HGC accepts no responsibility or liability for this document to any person or party other than the party by whom it was commissioned.

Any conclusions and/or recommendations herein reflect the judgment of HGC based on information available at the time of preparation and were developed in good faith on information provided by others, as noted in the report, which has been assumed to be factual and accurate. Changed conditions or information occurring or becoming known after the date of this report could affect the results and conclusions presented



NOISE



VIBRATION



ACOUSTICS

www.hgcacoustics.com

August 11, 2026

GEI Project No. 2402581 – 123006-013

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

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

**Re: ZBA 3rd Formal Submission
Arkell Subdivision
Puslinch, ON**

Dear Ms. Farncombe:

GEI Consultants Canada Ltd. (GEI) have reviewed third submission documents for a Zoning By-Law Amendment (ZBA) application in support of a proposed residential development on the subject lands located at Part of Lots 7, 8 & 9, Concession 10, in Arkell, Township of Puslinch. The third ZBA submission was received from the Township on August 4, 2026.

It is our understanding that the proposed development includes 44 single-detached residential lots with access from Watson Road South and Arkell Road.

A pre-consultation meeting was held in May 2023, and an initial submission was received in March 2024 based on our (formerly GM BluePlan Engineering Ltd) review letter dated May 15, 2024. A first formal submission for zoning bylaw amendment was reviewed on October 14, 2025. The second formal submission for zoning bylaw amendment was reviewed on February 13, 2026.

1. Documents Received

No new engineering documents were received as part of this submission. Please refer to the outstanding technical comments in Section 3 below.

2. Additional Documents Required

All plans and studies required from an engineering perspective were included in previous submissions and additional documents are not required to support the zoning bylaw amendment application.

3. Technical Comments

Based on our previous submission comments and review of submitted documents, we provide the following technical comments.

3.1. Deficiencies/Outstanding Matters

The following comments must be addressed to support the application.

No.	Matter	Document	Comment
10.	Pond Outlet	Grading and Servicing Plan	<u>GEI Comment (October 14, 2025)</u> The FSSWM report includes an orifice outlet and emergency weir for the dry pond – please show these on the drawings. Additionally, the calculations indicate the top of the pond is 339.90 m while the drawings show top of pond as 340.00 m. Please add additional details to Section 7.3 of the FSSWM Report discussing adequacy of the freeboard for the dry pond and anticipated drawdown time for the dry pond. <u>Updated GEI Comment (February 13, 2026)</u> The drawing has been updated with required and consistent information. Freeboard is discussed briefly in Section 7.3, however beyond this one sentence, ponding elevations are not explicitly discussed in the report or shown on the drawing. Please provide ponding elevations for each storm in Table 10 and show the 100-year pond elevation on the drawing. Please provide modelling for the regional storm. Please discuss pond drawdown times in the report.
11.	Minor Errors	FSSWM Report	<u>GEI Comment (October 14, 2025)</u> - In Table 2, and associated table in the appendices, the additional flow for fixture units should be 2100 L/day, which results in a total flow per unit of 4600 L/day. - Please ensure consistency throughout the report when referring to the two swales. In general, the northern swale seems to be referred to as the northern bioswale, and the southern swale seems to be referred to as the southern bypass swale, but there are sections where the terms bioswale and bypass swale are used interchangeably, and the directions are inconsistent. For example, when describing Catchment Ext. 3 in Section 6.2.1 runoff is said to be conveyed to the bioswale along the southwest property line. - Table 9 should be updated with the correct MOE Table 3.2 requirements (343 m³) and the correct provided treatment volume (672 m³). - The fourth column of The Dry Pond Facility table (Depth above PP/ED Orifice) in the appendices does not appear to be correct/relevant.

No.	Matter	Document	Comment
			e. The Type A dispersal bed footprint described in Section 9.0 is not correct (368 m² rather than 104 m²). <u>Updated GEI Comment (February 13, 2026)</u> a. Clarified. No further comment. b. In general references to the two swales are updated and much more clear/consistent. The description of External Catchment 3 still describes the swale being along the southwest property line rather than the western property line flowing south to north as described for other catchments. c. Updated. No further comment. d. Column 4 has been updated but still seems to be incorrect or irrelevant. e. Updated. No further comment. f. Section 4.2 refers to the Groundwater supply Assessment Report complete by ARL with the wrong date (2003 rather than 2023). g. Text could be added to Section 6.1 to discuss catchment Ext. 3. It is shown in the tables and on the drainage plan but not described in the fifth paragraph along with the other pre-development catchments. h. Please add the new post-development catchment 202 to Table 8. It is modelled and shown on the drainage plan and described elsewhere in the report but is missing from Table 8. i. The outlet column of Table 7 should be updated with the two proposed 300 mm diameter culverts, as shown on the updated drawing. j. Note 2 under Table 10 should be updated to include catchments 202 and Ext. 4.

3.2. Completed/Approved Matters

The following previous comments have been addressed.

No.	Matter	Document	Comment
1.	Secondary Access and Adjacent Lands	Grading and Servicing Plan	<u>GEI Comment (May 21, 2024)</u> Please confirm inclusion of the secondary access road. If the secondary access is not to be included, a cul-de-sac may be required per the latest Township of Puslinch Municipal Development Standards. Additionally, please confirm ownership of the lands adjacent to the possible secondary access (lots 922 and 923). An easement may be required for the proposed bypass swale through these lands. <u>Applicant Response (August 15, 2025)</u> The revised Site Plan illustrates a secondary access, although we understand that one is not required. <u>GEI Comment (October 14, 2025)</u> Acknowledged. No further comment.
2.	Culverts	Grading and Servicing Plan	<u>GEI Comment (May 21, 2024)</u> The Functional Servicing and Stormwater Management Report mentions existing culverts at the Guelph Junction Railway and Arkell Road as part of the proposed stormwater management strategy. Please indicate the location, size and grade of the existing culverts. <u>Applicant Response (August 15, 2025)</u> Existing culverts were observed on-site by Van Haarten. Crozier drawings updated with the information observed by Van Harten. <u>GEI Comment (October 14, 2025)</u> Based on the labelled inverts, the existing culvert at the Guelph Junction Railway appears to drain away from the site whereas the report suggests that it drains towards the site. Please label the size and shape of this culvert. Based on the topographical information shown, the existing culvert at Arkell Road appears to be 400 mm in diameter while the report states it is 300 mm – please clarify and label this culvert on the drawings as it is identified as the drainage outlet. We assume that new culverts will be needed at the Road A and Watson Road South connection and at the Road B and Arkell Road connection. Can these be preliminarily sized and shown on the drawings?

No.	Matter	Document	Comment
			<u>Updated GEI Comment (February 13, 2026)</u> Inverts and sizing have been provided for the GJR culvert. Sizing of the existing Arkell Road culvert has been clarified and sizing for proposed Arkell Road culverts provided – please update Table 7. Preliminary sizing for Watson Road and Road A culverts has been provided. No further comment at this time. Culvert sizing will be discussed further at detailed design to ensure compliance with the Township’s updated development standards.
3.	Rainfall Parameters	FSSWM Report	<u>GEI Comment (May 21, 2024)</u> The Functional Servicing and Stormwater Management Report appears to use outdated rainfall parameters. Please use IDF data from the latest City of Guelph Development Engineering Manual (October 2023). <u>Applicant Response (August 15, 2025)</u> FSSWM Report has been revised to use the IDF data from the latest City of Guelph Development Engineering Manual. <u>GEI Comment (October 14, 2025)</u> Acknowledged. No further comment.
4.	Stormwater Quality Control	FSSWM Report	<u>GEI Comment (May 21, 2024)</u> The proposed treatment train includes bioswales and a dry pond. However, a significant portion of the road network appears to drain directly to the pond. Please consider inclusion of an oil-grit separator at the end of the internal storm sewer network, prior to the dry pond, for treatment of road runoff and easy maintenance / clean-out. The FSSWM report states that the bioswale system falls short of the volume required for 80% TSS removal, and the outstanding treatment capacity will be provided by the dry pond. Furthermore, in addition to providing quality and quantity control for the site, the swales convey drainage from large external areas. Please provide additional discussion on stormwater quantity and quality control, ensuring that Enhanced level of protection is met (detention time, % TSS removal calculations, etc.). <u>Applicant Response (August 15, 2025)</u> An OGS unit is proposed at each outlet into the dry pond and bioswale. <u>GEI Comment (October 14, 2025)</u> Acknowledged. No further comment.
5.	Bypass Swales Maintenance	Grading and Servicing Plan	<u>GEI Comment (May 21, 2024)</u> Given that the proposed roads drain to the bypass swales, the Township would own and maintain the swales. Also, the

No.	Matter	Document	Comment
			bypass swales appear to be part of the proposed lots. Please indicate easements for the swales and access roads on the drawings for maintenance purposes. <u>Applicant Response (August 15, 2025)</u> Both the north swale and south swale are intended to promote infiltration. The north swale will have a shallow grade and will receive pre-treatment of runoff from the future municipal roads through an OGS system. We expect that any inspection/maintenance can be conducted via easements which are proposed for each storm sewer outlet. Similarly, the south (by-pass) swale will promote infiltration, but its primary function is to convey clean runoff from upstream lands safely through the subject property. The by-pass channel will be heavily vegetated and is not expected to erode due to its very shallow longitudinal slope. As such, construction of maintenance access roads should not be required. Our experience with trying to dry sediment is that it can take weeks and a lot of machine effort. Rather than a dedicated drying area, our preferred method is to use a vac truck with hoses that can reach remote locations. The sediment is then transported in a sealed unit to avoid any spillage. <u>GEI Comment (October 14, 2025)</u> Acknowledged. Given that the Township will own the swales, we defer detailed review of maintenance requirements to Township Public Works staff (maintenance method, access locations and width, etc.). Please add an Inspection and Maintenance Section to the FSSWM Report detailing anticipated ongoing inspection and maintenance requirements for the SWM facilities including dry pond, swales and OGSs. This should include details about access, frequency, methods etc. In order to do this, it may be necessary to preliminarily size the OGS units and provide manufacturer information about operations and maintenance. This will be helpful to Township Staff to inform them about anticipated future workload and responsibilities. Fencing for SWM facilities will need to be discussed further at detailed design. <u>Updated GEI Comment (February 13, 2026)</u> Inspection and Maintenance Section added to report and OGS units preliminarily sized and information for the units provided. Fencing for SWM facilities will need to be discussed further at detailed design. For future detailed design submissions, it would also be helpful to calculate anticipated dry pond cleanout frequency.

No.	Matter	Document	Comment
6.	Sediment Control Pond	FSSWM Report	<u>GEI Comment (May 21, 2024)</u> Given the large area of the site, please include a pond as one of the erosion and sediment controls, to be sized per the Erosion and Sediment Control Guideline for Urban Construction. <u>Applicant Response (August 15, 2025)</u> A detailed ESC plan, including temporary sediment ponds, can be provided as the detailed design progresses. <u>GEI Comment (October 14, 2025)</u> Acknowledged. Given the size of the development, a sediment control pond shall be considered during the detailed design stage.
7.	Fire Water Storage	Grading and Servicing Plan	<u>GEI Comment (May 21, 2024)</u> Please indicate the proposed location of fire water storage on the engineering drawings. <u>Applicant Response (August 15, 2025)</u> Fire Storage tanks have been identified on the servicing plan. Tanks are to be located within the future ROW. <u>GEI Comment (October 14, 2025)</u> Acknowledged. We defer any further fire water storage requirements to the Township fire department. Further refinement of the fire water supply design can be completed at detailed design.
8.	Noise and Vibration Study	N/A	<u>GEI Comment (May 21, 2024)</u> Per our review letter dated May 15, 2023, please provide an updated Noise and Vibration Study to reflect the revised development concept, current rail volume data and to confirm berm and setback requirements from the existing railway. <u>Applicant Response (August 15, 2025)</u> An updated Noise and Vibration Study can be provided as a condition of approval. It is important to get the lot layout finalized before this study is completed as the recommendations will apply to the closest proposed receptors. <u>GEI Comment (October 14, 2025)</u> Acknowledged. We defer noise study requirements to Township and County planners.
9.	Post-Development Catchment Areas	FSSWM Report	<u>GEI Comment (October 14, 2025)</u> Catchment UC02 appears to include Lot 2. The percent imperviousness of this catchment should be updated accordingly.

No.	Matter	Document	Comment
			It appears that some of Catchment UC01 may flow to the northern bioswale, as opposed to the southern bypass swale as described in the FSSWM Report. Please confirm. Per the preliminary grading plan, Lots 27, 28, 35, 36 and 43 appear to drain to the southern bypass swale. Is this the intent? If so, please update the report and modelling accordingly. <u>Updated GEI Comment (February 13, 2026)</u> UC02 has been updated. UC01 is now described/modeled as flowing to the northern bypass swale. Catchment 202 has been added to show drainage from rear and side yards to the south bypass swale. We have noted that, per the preliminary grading plan, a small portion of Road B, which is part of catchment 201, may flow uncontrolled to Arkell Road. These flows would bypass the OGS, northern bioswale and dry pond. This should be addressed at detailed design.
12.	Hydrologic Modelling and SWM Calculations	FSSWM Report	<u>GEI Comment (October 14, 2025)</u> - Please ensure that a Guelph Permeameter Test is completed prior to detailed design to confirm the in-situ hydraulic conductivity in the areas of the site where LID facilities will be installed. - The bioswale calculations in the appendices are based on 17 control weir ponding areas, whereas the drawings show only 11 weirs. Please confirm. There also appears to be some discrepancy between the slopes used for some sections in the calculations and those shown on the drawings. - Is it possible to describe anticipated depths of flows in the bioswale for the various design storms? - The SSD Table used in the model for the dry pond does not include the weir outflows. However, this likely won't impact the design or results provided <u>Updated GEI Comment (February 13, 2026)</u> - This comment has been acknowledged in the report text. No further comment. - Updated. No further comment. 100-year flow depths provided in the report appendices. No further comment. - Updated. No further comment.
13.	Water Balance	FSSWM Report	<u>GEI Comment (October 14, 2025)</u> A Water Balance was provided under separate cover. Could a section be added to the FSSWM Report to discuss the

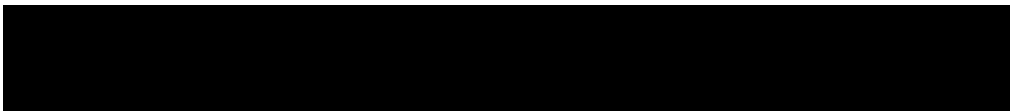
No.	Matter	Document	Comment
			findings of the water balance and how the proposed LID facilities will mitigate the identified deficit? <u>Updated GEI Comment (February 13, 2026)</u> Section added to report. Low impact development design should be demonstrated and discussed further at detailed design. At detailed design information should be provided on the drawings for the bioswale, including location(s) and depth of underground storage (486 m long, 1.5 m wide, 0.4 m depth per the report), distance from bottom of infiltration feature(s) to seasonal high groundwater elevation, plantings, etc.

As previously noted, the Township is in the process of updating their Municipal Development Standards. Prior to the commencement of detailed design, Township Staff and Consultants will meet with the Developer's consultants to discuss any design details that should be incorporated where possible to meet any new/updated requirements.

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.
Project Engineer



Environmental Assessments & Approvals

July 9, 2026

AEC 21-130

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

Attention: Monika Farncombe, Planning and Corporate Services Coordinator

Re: Peer Review of an Environmental Impact Study for a Proposed Development – Part of Lots 7-9, Concession 10 (Arkell), Township of Puslinch, County of Wellington

Monika Farncombe:

Azimuth Environmental Consulting, Inc. (Azimuth) is pleased to provide this technical peer review letter and enclosed attachment regarding an Environmental Impact Study (EIS) conducted for an Official Plan Amendment (OP-2006-06), Zoning By-law Amendment (P10/2006), and Draft Plan of Subdivision for the property located Part of Lots 7-9, Concession 10 (Arkell), in the Township of Puslinch ("Township"), County of Wellington ("County"). The EIS was prepared by Stovel and Associates Inc. (SAI) dated May 2026. Appendix B – Addendum – Vascular Plant List (provided July 9, 2026) was also reviewed under this assignment.

Peer Review Scope

The scope of this peer review was to complete a technical review of the EIS report from a natural heritage perspective. This summative peer review letter provides general review comments and key technical considerations. The peer review also tabulates specific technical comments that require responses (see Comment/Response Matrix – Appendix A). The peer review is restricted to technical natural heritage content, and the extent to which the assessment supports report conclusions. Consideration of other disciplines including (but not limited to) planning, geotechnical, archaeological, and hydrogeological review, *etc.*, is outside the scope of this peer review and is presumed to be addressed by others, where required.

This peer review did not involve a site visit and is therefore prepared with regard for background resources and air photo interpretation, but otherwise under the assumption that existing conditions on the property are consistent with those reported in the EIS.



Key Technical Review Considerations

Significant Wildlife Habitat Assessment

In the context of Eastern Wood-pewee, the EIS states that "the onsite plantation is not considered to be critical to the life functions of this species". The breeding bird survey data provided by Colville Consulting Inc. however indicates that this species demonstrated confirmed breeding given that an adult was seen leaving or entering nest site in circumstances indicating an occupied nest (breeding code – AE). Further, the EIS states that "the onsite plantation is not considered to be significant wildlife habitat". As per the Significant Wildlife Habitat Criteria Schedules for Ecoregion 6E for Special Concern and Rare Wildlife Species, "the area of the habitat to the finest ELC scale that protects the habitat form and function is the SWH, this must be delineated through detailed field studies. The habitat needs to be easily mapped and cover an important life stage component for a species *e.g.* specific nesting habitat or foraging habitat." Azimuth recommends that Eastern Wood-pewee is acknowledged as Significant Wildlife Habitat and that Significant Wildlife Habitat for Special Concern and Rare Wildlife Species is discussed in the Impact Assessment.

Species at Risk

With regards to Butternut, the EIS outlines that since "less than five Category 3 and less than fifteen Category 2 butternut trees will be killed as a result of construction, no replacement planting will be required, as outlined in Ontario Regulation 830/21 Section 25(3)." Ontario Regulation 830/21 was made under the *Endangered Species Act*, 2007 (ESA) which was replaced by the *Species Conservation Act* (SCA) on March 30, 2026; Ontario Regulation 830/21 is therefore no longer applicable.

It is recommended that the Butternut tree be re-assessed closer to the time of development to confirm its health status. Registration for the removal of the Butternut may be required should it be deemed to be 'healthy'. A Conservation Plan may be required as part of the registration as per Schedule 1 of Ontario Regulation 75/26 under Ontario's SCA.

**Closure**

We trust that this peer review is helpful regarding the submitted EIS report for the proposed undertaking. If you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

AZIMUTH ENVIRONMENTAL CONSULTING, INC.

Alexa Pompilio-Grant, M.B.Sc.
Terrestrial Ecologist

Attached:

Appendix A – Comment Matrix (dated July 9, 2026)



August 14, 2026

Monika Farncombe
7404 Wellington Road 34,
Puslinch, Ontario

Dear Monika Farncombe,

RE: **NPG Comments**
605 Arkell Road & Part of Lots 7,8,9, and Concession 10
RE: Application for Zoning By-law Amendment – 1st Technical Review

NPG Planning Solutions Inc. (NPG) has been retained to provide comments on a Zoning By-law Amendment Application on lands known as Part of Lots 7, 8, 9 and Concession 10 and part of the lands municipally known as 605 Arkell Road ("Subject Lands").

The applicant is proposing a residential subdivision consisting of 44 single detached dwelling lots, a park, and a stormwater management block on The Subject Lands. The Subject Lands are approximately 20.57 hectares in size and have 260 meters of frontage along Arkell Road and 118 meters of frontage along Watson Road South. The Subject Lands contain a single detached dwelling and an accessory structure on the 605 Arkell Road Property, the rest of the Subject Lands are vacant. Surrounding uses consist of agricultural and rural residential uses. In addition, the southwestern portion of the Subject Lands abut the Guelph Junction Railway.

The Subject Lands are located outside of the Grand River Conservation Authority's (GRCA) regulation limit, however, there appear to be woodland features on the Subject Lands in accordance with the GRCA's mapping.

This is the fifth submission for a Zoning By-law Amendment (ZBA) application. As part of the submission, NPG has reviewed the following additional documents:

- Letter and Comment Response Matrix prepared by Stovel and Associates Inc., dated July 29, 2026;
- Response to Peer Review Comments for Arkell Subdivision prepared by HGC, dated August 4, 2026; and
- Appendix B – Addendum – Vascular Plant List.

Provincial and County Policy

The Subject Lands are Prime Agricultural Areas, Rural Lands with a portion of the lands in the Rural Settlement Area as per the Provincial Planning Statement 2024 (PPS). Schedule B7 of the County of Wellington Official Plan (County Official Plan) designates the majority of the Subject Lands as Prime Agricultural and Secondary Agricultural with a portion of the Subject Lands fronting onto Watson Road South designated Hamlet Area.

The proposed ZBA to facilitate the subdivision on Prime Agricultural and Secondary Agricultural lands does not appear to conform with the County OP at the moment. We understand that an OPA application has been submitted to the County to bring these areas of the Subject Lands into the Arkell Hamlet Area. Once the OPA application is circulated to the Township, we will provide comments on policy consistency and conformity of both the OPA and ZBA applications.

Township Zoning By-law

The Subject Lands are zoned Agricultural (A) under the Township's Comprehensive Zoning By-law No. 023-18 ("Puslinch Zoning By-law"). The proposed residential subdivision would not comply with the Puslinch Zoning By-law and a Zoning By-law Amendment application is required to facilitate the development.

Technical Comments

1. Application Support:

- a. At the moment, we are unable to recommend support for the application.

2. Additional Requirements:

- a. Technical comments below should be addressed to the Township's satisfaction.

3. Technical Comments:

- a. We understand that the applicant has submitted an Official Plan Amendment (OPA) with the County of Wellington to facilitate the expansion to the Hamlet of Arkell to include the proposed development. Once the OPA application is circulated by the County, we will comment on the proposal's consistency with the PPS and conformity with the County of Wellington Official Plan (County OP) under the requested amendments to the County OP
- b. Additionally, we understand that the applicant intends to submit a Draft Plan of Subdivision for the proposed development following the technical review of the ZBA. The Draft Plan of Subdivision application may resolve some of the zoning matters that have been identified thus far. We may update our comments related to zoning following the review of the Draft Plan of Subdivision application accordingly.

- c. With respect to the Minimum Distance Separation analysis, the portion of the Subject Lands impacted by the MDS I setback required for Farm 3 at 930 Watson Road South should be excluded from the extent of the rezoned areas.
- d. With respect to the concept plan, we offer the following comments:
 - i. It is noted that if blocks 46 and 48 become lots as part of the draft plan of subdivision application, these lots may not meet the minimum lot frontage requirement.
 - ii. A 5-metre road widening has been identified along Watson Road South on the Concept Plan. Please include the current width and the original centreline of this right-of-way to confirm if any road widening would be required through the Draft Plan of Subdivision process.
- e. With respect to the draft Zoning By-law Amendment, we offer the following comments:
 - i. The Draft Zoning By-law should be updated once a Draft Plan of Subdivision is submitted. We expect the requested land uses to be site-specific and reflect the draft plan.
 - ii. The schedule of the draft by-law incorrectly references the property municipally known as 605 Arkell Road as “603 Arkell Rd”.
 - iii. “Stormwater management facilities” should be requested as a permitted use.
 - iv. The Noise Study recommends a minimum setback of 55 metres from the railway right-of-way for all dwellings. Please advise how this recommendation will be incorporated into the Zoning By-law Amendment.
 - v. It appears that there is no immediate plan for the remaining plantation that is outside the limits of the proposed residential subdivision. Please consider excluding this area from the extent of the rezoned areas. Alternatively, a more appropriate zone should be considered.
- f. With respect to the Noise and Vibration Feasibility Study, we offer the following comments:
 - i. As previously noted, the extent of the Subject Lands that has been evaluated by the Noise and Vibration Feasibility Study (NVFS) (figure 1) does not align with the extent of lands subject to the ZBA application as detailed in the schedule of the draft Zoning By-law. Please ensure alignment between the extent of the study area of the NVFS and the extent of lands subject to the proposed ZBA application.
 - ii. The Draft Zoning By-law is proposing a minimum rear yard of 6 metres and minimum interior side yard of 2 metres for all dwellings, including

those on Lots 1-5. These requested zone standards would permit future dwellings on Lot 1 to be as close as 2 metres from the nearest lot line to the railway and dwelling on Lots 2-5 to be as close as 6 metres from the nearest lot line to the railway. Please confirm if the noise evaluation in Section 3.2.3, Table 4, Figure 2 and Figure 3 of the Noise Study would need to be updated to analyze these building locations for potential “worst-case” impact.

- iii. For clarity, Section 4.26 of the Puslinch Zoning By-law identifies the extent of the required sight triangle where a street intersects a railway right-of-way at grade to be 46m x 46m. HGC indicated that the 2.7-metre-high acoustic barrier proposed for Lot 1 is not anticipated to be located within the required sight triangle. Please confirm if this assessment is still correct.
- iv. Additionally, SAI’s comment matrix indicated that Crozier confirmed that a 46m x 46m sight triangle is not required. For clarity, the sight triangle required by Section 4.26 of the Puslinch Zoning By-law is different from a daylight triangle that needs to be conveyed to the Township. Section 4.26 prohibits building, structure, parked vehicles, grading or landscaping (exceeding 0.6 meters in height) within such sight triangles. As a regulation in the Puslinch Zoning By-law, Section 4.26 and the requirement related to the sight triangle is applicable law. The applicant should consider if the proposal would require relief from this section of the Puslinch Zoning By-law.
- g. As previously requested, the PJR should provide additional justification for the permission of additional residential units and home businesses. This should be accompanied by an update to relevant supporting studies to confirm that additional residential units and home businesses would not generate negative impacts. In particular, the requirements of Section 4.4.6 of the County’s Official Plan and Section 4.2 of the Township’s Zoning By-law should be addressed.
- h. With respect to the Environmental Impact Study, we offer the following comments:
 - i. The Township’s ecologist has noted that Significant Wildlife Habitat for the Eastern Wood-pewee is present within the woodland on-site. Significant Wildlife Habitat are considered Greenland features under Section 5.5.1 of the County OP. Additionally, the submitted draft Zoning By-law Amendment provides that the proposed development extent, i.e. the rezoned areas, would encompass the plantation and the significant wildlife habitat. Analysis in Section 6 of the EIS may need to be updated.

- ii. We further understand that the OPA requests to re-designate the plantation and the significant wildlife habitat to Hamlet Area as well. Once the OPA is circulated for comments, we will comment on the applicable natural heritage policies to be reviewed for both applications. The EIS may need to be updated to provide additional analysis for these policies.
- iii. The EIS should provide a discussion of whether the extent of the Significant Wildlife Habitat warrants being rezoned to a Natural Environment (NE) Zone.
- i. It is noted that the Stage 1-2 Archaeological Assessment does not include the northern portion of the Subject Lands, i.e. 605 Arkell Road. A Stage 1-2 Archaeological Assessment and clearance letter from the Ministry of Citizenship and Multiculturalism (MCM) is required for this portion of the Subject Lands. Accordingly, a holding provision may be recommended to address this.
- j. Parkland dedication and Development Charges may be required in accordance with the prevailing Township's by-laws.

Sincerely,

Jeremy Tran, MCIP, RPP

Manager, Urban Design & Development Planning

NPG Planning Solutions Inc.

jtran@npgsolutions.ca

Lichheng Lim, MCIP, RPP

Senior Planner

NPG Planning Solutions Inc.

llim@npgsolutions.ca