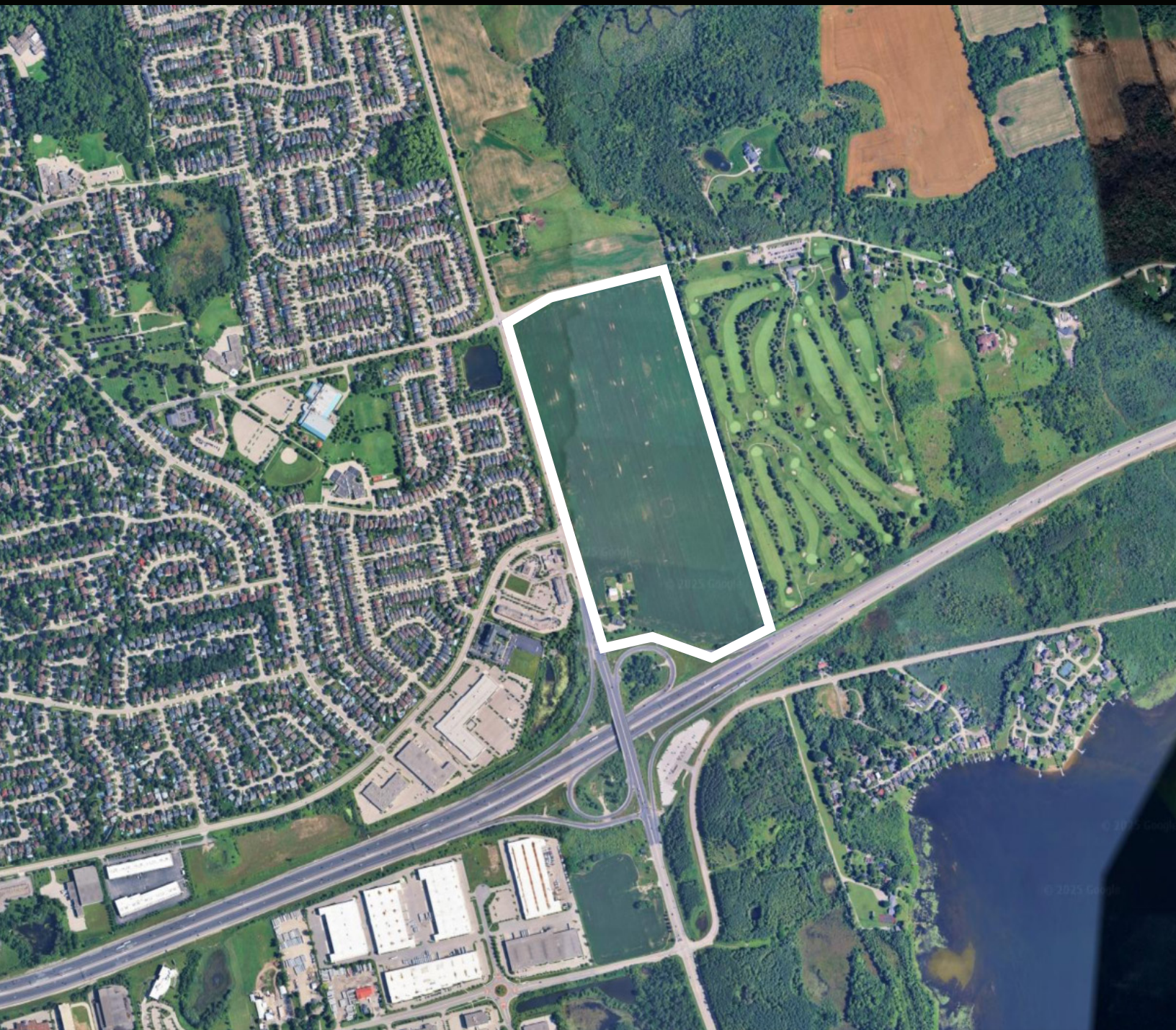


» PLANNING JUSTIFICATION REPORT ADDENDUM

2809 Townline Road Puslinch, Ontario

September 2026



September 10, 2026

To the Attention of:
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**RE: Planning Justification Report - Addendum Letter
2781-2809 Townline Road, Township of Puslinch, County of Wellington**

This letter has been prepared in support of a resubmission of an Official Plan Amendment ("OPA") (OP-2025-11) and Zoning By-law Amendment ("ZBA") (D14-CUL) application for the lands municipally known as 2781-2809 Townline Road ("subject site") in the Township of Puslinch.

1 Background

On April 30, 2026, a Notice of Complete Application ("NOAC") was provided by the County of Wellington in relation to the OPA. On May 27, 2026, the Township of Puslinch ("the Township" or "Puslinch") provided a NOAC for the ZBA. Both applications were filed by Townline Gateway Holdings Ltd. on behalf of Fieldgate Properties Ltd. ("the Property Owner") to enable the redevelopment of lands which contain agricultural uses and one detached dwelling, one-storey development showroom, and small surface parking lot.

The proposal includes a prestige industrial development with industrial, commercial, retail, and gas bar uses. The subject site is proposed to be redesignated from Secondary Agricultural Area to Rural Employment Area and Policy Area (PA7-X) and rezoned from Agriculture (A) to Industrial (IND) with site-specific special provisions.

Sajecki Planning ("the planning consultant") prepared a Planning Justification Report (PJR), dated March 2026, in support of the application. The report concluded that the proposal represents appropriate redevelopment of an underutilized site. It will support the creation of new employment opportunities along a regional road and is adjacent to a major

transportation corridor. Further, the subject site can be serviced without municipal infrastructure investment and does not result in significant adverse impacts on the surrounding area and uses.

Proposed Development and Planning Analysis

The proposed prestige industrial development, as shown in both Site Plan A and Site Plan B, consists of three stand-alone industrial buildings, three multitenant industrial buildings, and surface parking lots. The three stand-alone industrial buildings, each with a footprint of approximately 16,200 m², are located at the northern extent of the subject site. Towards the middle of the site are the three multitenant industrial buildings, each with 11 units and a footprint between 9,814 m² and 10,427 m².

In addition to the industrial buildings, Site Plan A (the preferred scenario) proposes a large-format retail store of 15,090 m² and gas bar. Site Plan B proposes two additional industrial buildings of 19,510 m² in place of a retail store and gas bar.

Public Consultation

On June 9, 2026, the application was presented to the Township's Planning and Development Advisory Committee ("PDAC"). The PDAC expressed support for the development in principle, subject to all the necessary application requirements and conditions being met and a well protection protocol and cumulative water taking study be provided. No delegations were made by members of the public who were in attendance.

On June 17, 2026, a Public Information Meeting ("PIM") was held. The PIM was attended by Township Council members, NPG Planning Solutions (the Township's planning consultant) ("NPG"), County Planning Staff, and several members of the public. One member of the public provided a delegation expressing concerns for the removal of fertile farmland in the Township and that the subject site be included as part of the Puslinch by Design study. The Mayor and Councillors raised several questions about the proposal including the proposed servicing approach, methodology of the traffic study, and the design of the development. Further, the rural nature of the Township was highlighted, and the Property Owner was encouraged to seek further comments from the Region of Waterloo.

In total, four comment letters were received from members of the public as well as a letter from the Puslinch Golf Club. Comprehensive responses to these comments have been provided in a comment matrix submitted as part of the formal resubmission.

Responses to Comments

This PJR Addendum Letter addresses comment letters received on the application from NPG (dated May 25 and June 5, 2026), County Planning Staff (dated July 17, 2026), the City of Cambridge (dated July 7, 2026), the Region of Waterloo (dated August 10, 2026), and Ministry of Transportation (dated July 20, 2026). Since the original submission, the proposal has been revised to pursue on-site private services to better align with Wellington OP policies and preferences expressed by Township and County Staff. Additionally, the Draft OPA and ZBA planning instruments have been updated to reflect key comments from Staff.

The overall conclusions and planning opinion provided in the original PJR remain unchanged as the revised proposal continues to be appropriate, desirable, and achieves good planning.

2 Response to Key Planning and Design Comments

As part of the application review process, the planning consultant had various meetings with Township and County Planning Staff to clarify requirements and discuss key planning issues. Below is a summary of our responses to comments received from Township and County Staff (which includes NPG and County Planning Staff), the City of Cambridge, the Region of Waterloo, and the Ministry of Transportation.

Please note that the below responses are to be read in conjunction with the PJR and comment response matrix provided with the resubmission.

2.1 Additional Policy Analysis

Township and County Planning Staff requested further analysis of several policies of the Provincial Policy Statement ("PPS") and County of Wellington Official Plan ("Wellington OP"). Regarding the PPS, the policies of Section 2.5 Rural Areas and Section 2.6 Rural Lands are evaluated below, followed by additional review of policies pertaining to "area of employment" and "employment area". Next, Sections 6.8.1, 11.2.3, and 11.2.6 of the Wellington OP are examined in relation to the proposed development.

Response:

2.1.1 Provincial Planning Statement (2024)

Section 2.5 of the PPS provides policies pertaining to *rural areas* in municipalities. A *rural area* includes *rural settlement areas*, *rural lands*, *prime agricultural areas*, *natural heritage features and areas*, and *resource areas*. Per Policy 2.5.1, healthy, integrated, and viable *rural areas* should be supported by building upon rural character, using rural *infrastructure* and *public service facilities* efficiently, conserving biodiversity, and promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management of resources. Within *rural areas*, *rural settlement areas* are to be the focus of growth and development, however, when directing growth to these areas, planning authorities shall consider locally appropriate rural characteristics, the scale of development, and the provision of appropriate service levels (Policy 2.5.2 and Policy 2.5.3). Growth may be directed to *rural lands* in accordance with Policy 2.6.

Rural lands are lands located outside *settlement areas* and *prime agricultural areas*. Per Policy 2.6.1, permitted uses on *rural lands* located in municipalities include the management or use of resources, resource-based recreational uses, residential development where site conditions are suitable for the provision of appropriate sewage and water services, agricultural uses, home occupations and home industries, cemeteries, and other rural land uses. Development that can be sustained by rural service levels is to be promoted (Policy 2.6.2) and is to be appropriate to the infrastructure that is planned or available (Policy 2.6.3). Planning authorities are to support a diversified rural economy by protecting agricultural uses and directing non-related development to areas where constraints on these uses are minimized (Policy 2.6.4). New land uses are to comply with the minimum distance separation ("MDS") formulae (Policy 2.6.5).

While Policy 2.6.1 does not explicitly enumerate large-format retail or fuel bar uses among the permitted uses on rural lands, Policy 2.6 does not operate as a closed list; it establishes a framework within which planning authorities retain discretion to permit other rural land uses, provided they are compatible with the rural context and sustainable at rural service levels. The proposed commercial uses are addressed through a site-specific Policy Area exception under the Wellington OP, which is the appropriate mechanism for permitting a rural land use of this nature and scale that falls outside the uses generally contemplated by Policy 2.6.1, rather than an assertion that the uses fall within Policy 2.6.1's existing permissions.

In Section 2.8 of the PPS, policies pertaining to employment are provided. Planning authorities are directed to promote economic development and competitiveness through several actions, including the following, as indicated by Policy 2.8.1.1:

- a. *providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
- b. *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c. *identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d. *encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and,*
- e. *addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*

As discussed in the PPS policy analysis above, the proposed large-format retail store and gas bar are not put forward as uses generally permitted on rural lands or within Rural Employment Areas; they are addressed through the site-specific Policy Area mechanism, consistent with the discretion afforded to planning authorities under Policy 2.6 of the PPS to permit rural land uses on an exception basis where local circumstances warrant. Per Policy 2.8.1.2, industrial, manufacturing, and small-scale warehousing uses that could be located adjacent to *sensitive land uses* without adverse effects are encouraged in *strategic growth areas* and mixed-use areas where *frequent transit service* is available outside of *employment areas*. *Employment areas* are areas designated in an official plan for clusters of business and economic activities, including manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. Institutional and commercial uses, such as retail and office uses not associated with the primary employment use, are excluded from *employment areas*. Planning authorities are to plan for, protect and preserve *employment areas* for current and future uses and ensure the necessary *infrastructure* is provided to support needs (Policy 2.8.2.1). When planning for *employment areas*, planning authorities are to maintain land use compatibility with *sensitive land uses*, as well as the long-term operational and economic viability of the planned uses and functions of the areas (Policy 2.8.2.4).

Through a lands needs assessment (prepared by Watson & Associates Economists Ltd., August 2022), the County identified a rural employment land need of 30 hectares for

Puslinch. Additional rural employment lands were proposed through Puslinch by Design and are identified in Draft OPA 131, which is currently under review by the Ministry of Municipal Affairs and Housing ("MMAH"). The proposed development will add new rural employment lands to the Township that will support the fulfillment of land need requirements.

Summary

A Unique Rural Context and Strategic Location

The subject site is in a *rural area on rural lands* that are uniquely situated for the proposed development. It is strategically situated along a regional road between the Township of Puslinch and City of Cambridge and has immediate access to the 400-series highway. Directly east is the Puslinch Golf Club (circa 1962) and directly to the west is Hespeler Village in the City of Cambridge; a fully built-out community comprised of low-rise residential dwellings, schools, places of worship and community amenities. Along the Highway 401 corridor, southwest of the subject site, are retail plazas, shops, restaurants, a gas station, hotels, commercial and industrial buildings, and warehouses. The subject site's strategic location is particularly suitable for employment-generating uses that require regional accessibility and goods movement.

Consistent with Section 2.5 and 2.6 of the PPS, the proposed prestige industrial development supports the creation of healthy, integrated, and viable *rural areas* by promoting diversification of the economic base and facilitating employment growth. A range of employment and broader land uses are proposed to accommodate an estimated 600 to 700 new jobs, which can strengthen the economic vitality of the Township and the County. Further, the proposal complies with MDS formulae and is supported by comprehensive transportation, geological, servicing, natural heritage, agricultural impact, and land use compatibility studies that have demonstrated the development will not have significant adverse impacts on surrounding uses.

Associated vs. Freestanding Commercial Uses

Policy 2.8.1.2 does not exclude all commercial uses from employment areas, rather it excludes institutional and commercial uses "*not associated with the primary employment use.*" The definition of *employment area* in the same policy contemplates "*associated retail and office*" as a component of employment area function, alongside manufacturing, warehousing, and goods movement. The relevant policy test is therefore whether the uses are associated with, and subordinate to, the primary employment function of the site.

The proposed large-format retail store and gas bar meet this test on several bases:

- **Scale and proportion:** The large-format retail store, which is approximately 15,090 m², represents a small share of the proposed development's total building footprint. For both development concepts, this footprint includes a minimum of 78,600 m² of stand-alone and multitenant industrial building area. Both the large-format retail store and gas bar are subordinate in scale to the industrial component and are not the organizing uses of the site.
- **Location and configuration:** The large-format retail store and gas bar are sited at the southern edge of the property, adjacent to Highway 401. They are physically separated from, and peripheral to, the core industrial building envelope. This configuration is consistent with a servicing/ancillary role rather than that of a freestanding commercial anchor.

- **Functional relationship to goods movement and employment:** The PPS definition of *employment area* specifically identifies goods movement as a core employment area function. The gas bar serves fleet vehicles, delivery trucks, and transient goods-movement traffic generated by the industrial and warehousing uses on the site and along the Highway 401 corridor. The large-format retail store similarly draws on and serves the labour force and goods-movement activity generated by the surrounding employment uses.
- **Distinction from urban centre commercial:** Consistent with Wellington OP Policy 6.8.2, the proposed commercial uses differ from those normally found in primary and secondary urban centres. The proposed retail store is of a large-format, highway-oriented, service-focused, and reliant on regional road exposure and a large lot size. As concluded by the Scoped Market Analysis Assessment completed by Tate Research (September 2026), which is further discussed below, existing retail commercial space in the Township of Puslinch is limited and differentiated from that of the proposed large-format retail store.

A Market-Ready Rural Employment Area

Moreover, the objectives of Section 2.8 of the PPS are directly supported by the proposal to seek redesignation of the lands to Rural Employment Area and Policy Area (PA7-X). The proposal will add significant employment lands and jobs, comprised primarily of industrial, manufacturing, and warehousing uses, at a suitable site within the Township. Approximately 600 to 700 jobs will be created, and the proposed development will contribute towards the Township's objective of securing 30 hectares of rural employment lands to meet land needs requirements.

In particular, the subject site is appropriate for employment uses as it can support a wide range of economic activities, is market-ready and compatible with surrounding uses, will be supported by private on-site services, and is strategically located to ensure long-term operational and economic viability (Policies 2.8.1 to 2.8.2).

Immediate access to Highway 401, regional connectivity, and proximity to a labour force make the site highly attractive for investment from industrial, warehousing, manufacturing, and logistical industries. Special policies to support the large-format retail store and gas bar use are being sought, however these components are limited and complementary to the broader employment vision and function of the site.

Although new rural employment lands have been proposed through Puslinch by Design and identified in Draft OPA 131, the subject site is especially unique in that it is market-ready, owned by an active developer, and can be supported through on-site private services.

Overall, the proposed development advances Provincial employment objectives by providing a significant supply of new employment land in a strategic location, supporting the diversification of the economic base, and leveraging existing major transportation infrastructure.

2.1.2 County of Wellington Official Plan

Policy 6.8.1 of the Wellington OP defines Rural Employment Areas. These areas are expected to provide diversity to Wellington's land supply for business and are set aside for industrial and limited commercial uses that would benefit from a rural location due to the

need for a relatively large site, access to major transportation routes, or proximity to rural resources. Rural Employment Areas are to be used by “dry” industrial and limited commercial uses which do not use *significant* amounts of water in their operation and do not produce *significant* amounts of effluent, consistent with rural servicing levels that rely on private water and sewage systems (Policy 6.8.1)

Per Draft OPA 131, an addition is proposed to Policy 6.8.1, adding that new or expanding Rural Employment Areas are to be established by an amendment to the Wellington OP through a Policy Area under Part 9 Local Planning Policy.

Outside of secondary urban centres and hamlets, within the rural system the following water and sewage policies apply per Policy 11.2.6 of the Wellington OP:

- a) *development in the rural system is anticipated to be on individual on-site systems where soil conditions are suitable over the long term;*
- b) *private communal services may be allowed in recreational developments or if specifically allowed in a special policy area subject to the recommendations of a Servicing Options Assessment as set out in Section 11.2.3.*

Per Policy 11.2.3 Servicing Options Assessment, site specific multi-unit *development* applications relying on private communal or individual on-site servicing may be required to assess site and soil suitability and the viability of servicing options, recommend the type of sewage disposal system, demonstrate the suitability for on-site services, and assess the impact of the proposed servicing approach on ground and surface water, associated *ecological functions*, other wells, and natural features.

Where private communal services are recommended, the assessment must meet the requirements outlined by Policy 11.2.3 and include the signing of a responsibility agreement with the municipality that provides for the operation and maintenance of the system and potential take over and cost recovery of the system if certain conditions are met. The capacity of the system must be sufficient to support the size and density of the proposed development and include an appropriate amount of excess capacity. Per Policy 11.2.3, the construction of new municipal or private communal water and wastewater systems or their expansions is to only be considered where water conservation strategies and water demand management initiatives are being implemented and the new or expansion of services is to support the achievement of an intensification and density target.

Summary

A Distinctive Rural Employment Area

The proposed development will diversify Wellington’s land supply for business and facilitate industrial, limited commercial, retail, and gas bar uses through the redesignation of the lands to Rural Employment Area and Policy Area (PA7-X). Consistent with Policy 6.8.1 of the Wellington OP, the proposed uses benefit from a rural location due to the need for a relatively large site and access to major transportation routes to support the long-term economic viability of the development.

Consistency with the Intent of “Dry” Industrial Use Policies

Per the requirement for “dry” industrial and limited commercial uses as provided by Policy 6.8.1 for Rural Employment Areas, the proposed development does not include water-intensive industrial operations or the generation of industrial-strength wastewater. As detailed further in Crozier’s Private Servicing Assessment (November 2025) and comment

response letter (August 12, 2026), the water use and wastewater generated as part of the proposed development are domestic in nature. Specifically, for both Site Plan A and Site Plan B, approximately 80% of the projected industrial building wastewater flow is from water closets and office employees. The remaining 20% (equivalent to approximately 25,000 to 35,000 L/day) is attributed to the loading bays of the warehouse occupancy. This allocation is non-industrial in nature as it is intended to capture domestic wastewater generated by truck drivers and delivery personnel who are transient to the site and typically not included as part of the employee count for the building.

Although the total flow exceeds the requirements for “dry” industrial, for both development concepts, water usage is domestic in nature, and no process or industrial wastewater is anticipated to be generated as part of any assembly, manufacture, fabrication, repair packaging or storage activities. It is therefore Crozier’s professional opinion that the proposed use is consistent with the intent of the Wellington OP and the Puslinch Zoning By-law definition of “Industrial Use, Dry.” This rationale is consistent with the approach applied to similar dry industrial developments within the Township, including 7475 McLean Road.

In recognition of the scale of the development resulting in water use and discharge amounts that exceed the defined thresholds for “dry” industrial uses, a special Policy Area (PA7-X) is proposed to provide site-specific relief from these policies through the Draft OPA and supported by regulations in the Draft ZBA.

Further, per Puslinch’s Industrial policy (Policy 9.8.3), lands designated Rural Employment Area are permitted to have additional uses, including complementary commercial uses such as automotive uses and retail, which further supports the proposal. However, with the understanding that the proposed gas bar and scale of the proposed retail use are not in conformity with the permitted uses of Rural Employment Areas, a new Policy Area designation is being pursued that would provide site-specific exception policies for these uses.

Private On-Site Servicing

Following discussions with members of Township Council at the PIM, Township and County Staff, and the City of Cambridge, the proposal will be supported by private on-site servicing; consistent with Policy 11.2.3 and 11.2.6 of the Wellington OP. As provided in a letter from Crozier (dated January 27, 2026) that was submitted with the application to respond to hydrogeological comments, the proposed development can be functionally serviced with a water supply well to satisfy application requirements based on completed assessments. Bedrock wells in the area have yields that meet the demand of the proposed development. Once the site plan is further refined, a water supply assessment will be conducted to support a potential Site Plan Application, which will include the installation of test well(s), completion of pumping test(s), and collection of water quality samples for review. The capacity of the proposed system will be verified to ensure the proposed development may be supported, as per Policy 11.2.3.

Moreover, it is recognized that approval from Ministry of Environment, Conservation, and Parks (“MECP”) is required for the proposed servicing approach. As required by MECP, following the completion of 12 months of monitoring, a Permit to Take Water will be applied for to secure Environmental Compliance Approval for the proposed water use and

discharge. Recognizing the amount of time remaining in the monitoring period, the property owner requests that MECP's approval become a condition of Site Plan Approval.

2.2 Site Selection

County Planning Staff requested additional clarification and details as to why a rural location is required for the proposed development and whether alternative sites within the Puslinch had been evaluated.

Response:

As discussed above, the site has several characteristics that differentiate it from a typical rural property and contribute towards its suitability for redesignation to a Rural Employment Area and Policy Area (PA7-X). The unique context and strategic location of the site ensure the long-term economic viability of the proposed prestige industrial development and employment-generating uses that benefit from regional accessibility and investment. To summarize, the subject site:

- Is a large, deep parcel with a relatively flat topography that can accommodate the proposed development;
- Has immediate Highway 401 exposure and access via a cloverleaf interchange;
- Is adjacent to Townline Road, which is a regional road, and has signalized site access available (Intersection of Townline Road and Jamieson Parkway);
- Is a location where the existing land use pattern reflects a transition area as it abuts non-agricultural uses, including the Puslinch Golf Club and Hespeler Village neighbourhood of the City of Cambridge, which includes retail plazas, shops, restaurants, hotels, warehouses, and commercial and industrial buildings;
- Is a logical infilling opportunity that may avoid fragmentation of the greater agricultural land base as surrounding uses constrain the potential for agricultural expansion and reduce long-term flexibility of the lands for more intensive agricultural operations;
- Is not a Prime Agricultural Area or speciality crop area;
- Has proximity to a significant labour force;
- Is development and market-ready and owned by an active developer that is ready to advance the project;
- Complies with MDS formulae and does not have significant setback constraints to ensure compatibility with surrounding uses; and,
- Can proceed with on-site private servicing (i.e., does not require municipal infrastructure investment).

Due to the site's unique context and attributes, it is the preferred site within Puslinch for the proposed development.

2.3 Market Impacts

County Planning Staff expressed that the completion of a Market Analysis Study would assist in evaluating the impacts of the proposal, particularly as they pertain to commercial operations within Urban Centres and existing and future employment areas.

Response:

Tate Research was retained to complete a Scoped Market Analysis Assessment (September 2026). The study evaluated the suitability of the non-urban lands for the

proposed warehouse membership club ("WMC") at the site and assessed the potential impacts of the proposed development on the planned retail and service function of the Secondary Urban Centres of Morriston and Aberfoyle and nearby Rural Employment Areas.

Tate Research concluded that the site is well suited for the proposed development and that the WMC development concept supports its non-urban location. Further, existing retail commercial space in the Township of Puslinch was found to be limited and differentiated from that of the proposed WMC. It was noted that Puslinch residents are currently shopping at WMCs in other locations and that the proposed WMC can repatriate a portion of the expenditures that are currently leaving the community. Overall, the study concluded that the proposed development will not result in negative impacts on the planned function of Central Business Districts and Rural Employment Areas in the Township of Puslinch or any other locations in Wellington County.

2.4 The Urban-Rural Boundary

County Planning Staff clarified that the intent of Section 4.7 in the Wellington OP is to prohibit new development next to cities like Cambridge to ensure there is a clear distinction between urban and rural areas and to avoid inefficient expansions. Beyond the opinion that the subject lands would represent logical infilling and the separation of the subject lands is by a road, County Planning Staff inquired if there is additional justification that can be provided that would assist in providing a clear, distinct transition from the City limit and whether this would assist in deterring inefficient expansions.

Response:

The site is not adjacent to existing primary and secondary urban centres, hamlets, or cities within the Township, but does abut the Hespeler Village neighbourhood of the City of Cambridge, Puslinch Golf Club, and Highway 401. In addition to the proposed development representing a logical infilling opportunity due to the nature of surrounding land uses, development context, and proximity to Highway 401, the proposal provides significant landscape area buffers and building setbacks from the border of the Township of Puslinch and City of Cambridge. These buffers are greater than 40 metres in depth along the majority of the border and assist with creating a distinct transition from Cambridge's city limit and deterring inefficient expansions. On this basis, the proposal is properly characterized as a site-specific rural employment redesignation rather than a settlement area boundary expansion, and does not trigger the comprehensive review, land needs, or phasing requirements of Policy 2.3 of the PPS.

As the site is uniquely constrained by abutting fully developed parcels, including those of the Hespeler Village neighbourhood, and Puslinch Golf Club, the potential for future urban expansions in proximity to the subject site is low. The urban area of the City of Cambridge is not expected to expand nor be impeded by the proposed development. Likewise, the subject site is not adjacent to any existing urban centres within Puslinch and will not impede their efficient expansion. Further, the proposed prestige industrial development does not include residential uses, which are often a catalyst for urban growth and expansion.

2.5 Agricultural Impact Assessment and MDS Evaluation

NPG indicated that the Agricultural Impact Assessment, including the MDS, should be evaluated using the design capacity of the livestock facility. Further, Staff have requested additional discussion of whether lands with lower agricultural potential within the surrounding area or within the settlement boundary have been explored to accommodate the proposed development.

Response:

A new MDS analysis of the beef cattle operation at 3367 Townline Road was completed by MHBC in July 2026. Based on the maximum area capable of accommodating 56 cows, the updated setback from the closest point of the barn/manure storage to the subject site remain outside the building envelopes of the proposed development. The revised setback arc has been updated on the Draft ZBA. Within the arc, no buildings are permitted to be constructed.

Further, MHBC conducted an alternative location analysis in August 2026 to assess if lands with lower agricultural potential may accommodate the proposed development. Lands with access to Highway 401 between Brock Road and Townline Road were evaluated, as proximity and access to Highway 401 are the primary considerations for identifying potential employment lands within this area.

The assessment concluded that the subject lands are the most suitable and readily available location and are associated with a lower agricultural priority than the identified alternative locations. Amongst other considerations, the alternative locations are highly constrained by natural heritage and mineral aggregate resources. Further, the proposed site is already limited from an agricultural productivity perspective given its location relative to the established settlement area and abutting non-agricultural uses.

2.6 Urban Design Brief

NPG requested further justification demonstrating how the proposed development has been designed to achieve highway visibility and give prominence to the location and a sense of prestige. Further, NPG advised that the design brief should provide a recommendation of minimum landscape buffer to achieve effective screening.

Response:

Please refer to Ware Malcomb's updated Urban Design Brief (July 2026). Further, a new regulation has been added to the Draft ZBA that specifies a requirement for a minimum landscaped buffer along the south lot line of 15.0 m.

2.7 Archaeological Assessment

Township and County Planning Staff identified that a Stage 3 Archaeological Assessment is required due to the identification of artifacts with potential cultural heritage value during a previous assessment. County Planning Staff have requested a timeline on the submission of the assessments and the Ministry of Citizenship and Multiculturalism's acceptance letter.

Response:

Archaeological Consultants Canada ("ACC") was retained to complete the additional Archaeological Assessments. Stage 1 and Stage 2 Archaeological Assessments have been

completed and formally submitted. The Stage 3 Archaeological Assessment is underway. The property owner requests that the completion of the Stage 3 Archaeological Assessment be a condition of Site Plan Approval.

The acceptance letter from the Ministry of Citizenship and Multiculturalism has been requested. The Ministry has not provided a timeline for receipt of the letter.

2.8 Impacts on the Abutting Golf Course

County Planning Staff requested clarification regarding whether the supporting compatibility study and noise study have evaluated impacts on Puslinch Golf Club.

Response:

Per GHD, who prepared the land use compatibility study, *"the adjacent golf course was not considered a sensitive land use for the purposes of this Land Use Compatibility Study and was therefore not included in the assessment. Guideline D-6 is intended to address compatibility between industrial facilities and sensitive land uses, defined as buildings, amenity areas, or outdoor spaces where normal activities would reasonably be expected to experience adverse effects from contaminant discharges generated by a nearby facility. The guideline identifies residential dwellings, institutions, and certain specifically designated outdoor recreational uses as examples of sensitive land uses but does not identify golf courses as sensitive land uses. Furthermore, golf courses are not recognized by the MECP as noise-sensitive Points of Reception under NPC-300, which is consistent with the Ministry's broader approach to defining sensitive receptors. The nearest residential dwellings surrounding the Site represent the most sensitive receptors in the area and were therefore used as the basis for establishing applicable D-6 separation distances and evaluating land use compatibility. This interpretation is also consistent with previous guidance received from MECP staff that golf courses are not considered noise-sensitive points of reception."*

2.9 Ownership

County Planning Staff requested clarification regarding the future ownership of buildings to assist in determining future applications required on the subject site, such as ownership of private on-site services.

Response:

Market conditions will inform the future ownership of buildings.

2.10 Large-Format Retail Store

Township and County Planning Staff requested further information pertaining to the large-format retail store, including:

- The footprint size of the warehouse and retail components;
- Analysis of how the proposed scale and nature of the commercial uses are appropriate in Rural Areas and the Rural System;
- Confirmation whether the retail use will involve only products produced on site; and,
- Clarification regarding the site-specific "maximum gross floor area" definition.

Response:

The tenant of the proposed large-format retail store will be determined at a later stage (i.e., SPA or later). As such, the warehouse and retail component footprints are unknown at this time. On the site plans, and within the Draft OPA and Draft ZBA, a buffer has been applied to the proposed maximum net floor area of the large-format retail store to accommodate flexibility in the design as it advances.

Per Policy 2.8.1.2 of the PPS, as discussed in detail above, all commercial uses are not excluded from *employment areas*. Commercial uses that are associated with, and subordinate to, the primary employment function of the site are permitted. Both the large-format retail store and gas bar meet this criteria and serve a servicing/ancillary role rather than that of a commercial anchor. Further, the proposed retail store is distinct from that of an urban centre commercial use.

Per Policy 6.8.2, within Rural Employment Areas commercial uses requiring large lots, major road access, or proximity to rural resources are permitted. The commercial uses are to be service focused with limited accessory retail. Retail commercial uses and service commercial uses normally found in primary and secondary urban centres are not permitted. The proposed large-format retail store requires a larger lot and benefits from regional road access. Further, the unique context and attributes of the site, as provided in Section 2.2 Site Selection of this letter, makes the subject site particularly attractive for this type of use. As such, a site-specific exception to permit the large-format retail store within a Rural Employment Area by way of a Policy Area (PA7-X) is being pursued. The large-format retail store will be limited to a single building and tenant and located at the southern side of the property. The majority of the site is proposed to be developed for industrial uses. The retail store will provide 300 to 400 new jobs, support long-term economic viability, and attract regional investment due to its location and attributes.

The proposed large-format retail store will not exclusively involve products produced on site.

The site-specific "maximum gross floor area" definition has been removed from the planning instruments and replaced with "maximum net floor area" which is a defined term in the Puslinch Zoning By-law (see "floor area, net").

2.11 City of Cambridge Servicing Comments

County Planning Staff provided comments from the City of Cambridge (dated July 7, 2026) stating that the City does not support the allocation of water and sanitary services to the subject development since this would further constrain the ability to meet forecasted population and employment growth to 2051 in Cambridge. As such, the servicing approach for the proposed development must be revised.

Response:

Comments from the City of Cambridge (dated July 7, 2026) are acknowledged. In response, the proposed development has been updated and will pursue the provision of on-site private servicing with no connections to Cambridge water, wastewater, or storm infrastructure. Supporting application materials and studies have been updated accordingly.

2.12 Region of Waterloo Comments

Comments from the Region of Waterloo ("the Region") relate to water services, hydrogeology and source water protection, transportation, access permits, regional roads, transit services, and other matters. The Region of Waterloo requires a revised functional servicing report, hydrogeological study, and transportation impact study to be submitted. Following receipt of the revised reports and concepts, additional comments from Corridor Management will be provided.

Response:

Responses to Region of Waterloo comments have been provided by the applicable technical lead. Please review the following submission materials for detailed responses comments and further information:

- Region of Waterloo Response Letter prepared by Crozier (August 28, 2026)
- Regional Response Letter prepared by GHD (August 20, 2026)
- Functional Servicing and Stormwater Management Report prepared by Husson (July 2026)

2.13 Wellington Roads Comments

Following receipt of the Region of Waterloo's comments, Wellington Roads advised that, because Townline Road falls under the Region's jurisdiction and is maintained by the Region, it will rely on the Region to review and comments on any application materials submitted.

Wellington Roads further advised that if any road improvements are required, their preference would be that the Region would undertake the improvements. Further, they agree with the regional requirement of not supporting any servicing connections to Townline Road.

Response:

Acknowledged.

2.14 Ministry of Transportation Comments

County Planning Staff provided comments from the Ministry of Transportation ("MTO") (dated July 20, 2026) indicating that the submission had been considered in accordance with the Public Transportation and Highway Improvement Act ("PTHIA"), MTO's Highway Corridor Management Manual ("HCMM") and all related MTO guidelines and policies. MTO specified that Highway 401 along the subject site is a Class 1A – Freeway with a posted speed of 100 km/hr and Controlled Access Highway. As such, all requirements, guidelines, and best practices in accordance with this classification and designation apply. MTO expressed no objections to OPA, but that development of the property will require further MTO reviews and approvals.

Response:

Acknowledged.

2.15 Updating the Draft OPA and ZBA

Township and County Planning Staff requested that the Draft OPA and Draft ZBA be more tailored to the proposed development and recommendations of the supporting studies.

Response:

Amongst other updates, the following key revisions have been made to the Draft OPA and Draft ZBA to address Staff comments:

- Added further justification for the proposed development in PART A - THE PREAMBLE of the Draft OPA;
- Regulated the retail store size using a defined term of the ZBL (i.e., "floor area, net")
- Added additional prohibited uses in alignment with the land use compatibility study recommendations;
- Removed *"including that of retail commercial uses that are normally found in primary and secondary urban centres"* to further "tailor" the instruments;
- Removed all references to municipal servicing;
- Added policies and regulations seeking relief for water use and discharge (requiring approval from MECP);
- Added policies and regulations relating to Servicing Options Assessments and Servicing Responsibility Agreements;
- Updated the Draft ZBA to include a regulation that requires a minimum 15.0 m landscaped buffer along the south lot line to improve screening from Highway 401;
- Updated the Draft ZBA schedule to reflect the latest MDS Separation Setback recommendations.

3 Conclusion

Overall, the key comments received from Township and County Planning Staff regarding the application have been addressed as part of this resubmission.

The original planning opinion of the PJR, dated March 2026, remains valid as only modest revisions to the proposal have been made. The revised development continues to be appropriate, desirable, and represent good planning.

We trust that the revised application appropriately addresses key concerns and we look forward to continuing to work with Staff to advance this application.

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