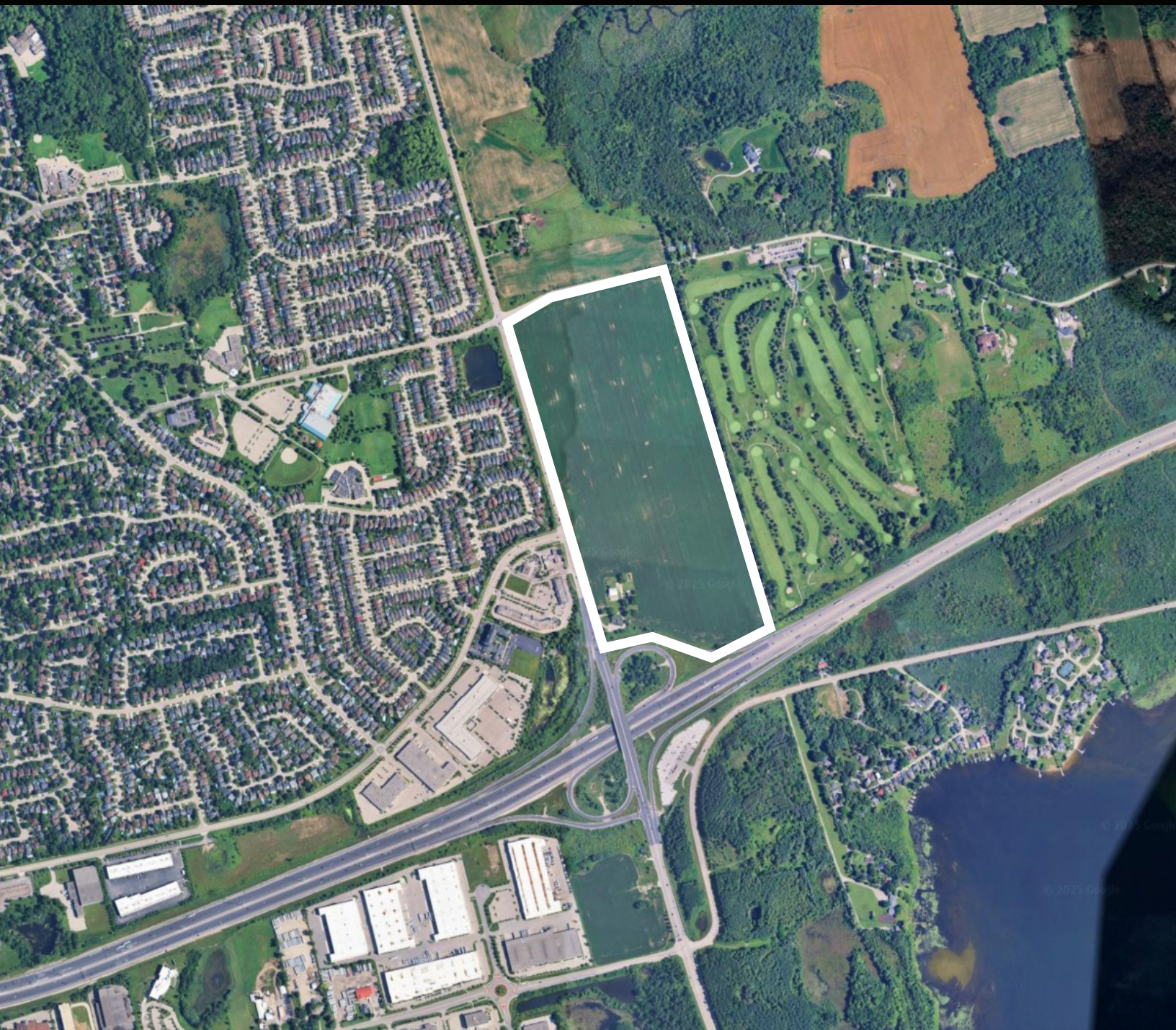


» **PLANNING JUSTIFICATION REPORT**

# **2809 Townline Road Puslinch, Ontario**

March 2026





Sajecki Planning Inc.

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## 1.0

## Introduction

This Planning Justification Report has been prepared by Sajecki Planning Inc. on behalf of Fieldgate Properties Limited to support an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) application at 2809 Townline Road (the "subject site" or "site") in the Township of Puslinch.

The subject site is in Ward 7 and located at the northeastern corner of the intersection of Highway 401 and Townline Road, directly adjacent to a suburban neighbourhood of the City of Cambridge. The site has a frontage of approximately 780 meters along Townline Road and a frontage of approximately 400 meters along Ellis Road. Currently, the site is occupied by an agricultural field, a farm, which includes a barn and a two-storey detached dwelling, and a one-storey development showroom with a small surface parking lot.

The site is generally rectangular in shape and has an approximate area of 337,346 m<sup>2</sup> or 34 hectares. The site is designated *Secondary Agricultural per Schedule B7 – Land Use* (Puslinch) of the County of Wellington Official Plan and is zoned *Agricultural (A)* per the Township of Puslinch Comprehensive Zoning By-law No. 023-18. The site is not within the Grand River Conservation Authority's (GRCA) regulation limit.

The OPA and ZBA application seeks to permit the development of a prestige industrial centre, comprised of a large format retail store, gas bar, and six industrial buildings that total 94,358 m<sup>2</sup> in area ("Site Plan A"). In the event a tenant for the large format retail store is not feasible, an alternative development proposal will be pursued, which is conceptually similar to that of Site Plan A. The alternative scenario proposes two industrial buildings in place of the retail store and gas bar and provides a total building area of 118,288 m<sup>2</sup> ("Site Plan B"). Due to the strong similarities between

the two proposals, both are discussed within this report and have been evaluated through a variety of technical studies, as described in Section 5.0. The preferred development scenario is that of Site Plan A and the draft OPA and ZBA, which are appended to this report, have been thoughtfully written to reflect this concept.

The lands are proposed to serve a special function that does not fit into a traditional land use designation at this time due to their location, servicing requirements, and the special characteristics of the area, most notably their adjacency to Highway 401, a regional road, and an urban area within the City of Cambridge.

The proximity of the lands to surrounding uses and their regional access to labour, goods, and services will help ensure the long-term operational and economic viability of the planned uses. In particular, the site's location adjacent to Highway 401 makes it a suitable location for future *Rural Employment Area* lands, consistent with criteria outlined in the *Puslinch by Design Employment Land Study*.



FIGURE 1. Aerial photo of Subject Site

Due to the site's unique context and proposed function, this application seeks to redesignate the lands from *Secondary Agricultural* to *Rural Employment Area* with site-specific exceptions that are provided by the policies of a new *Policy Area (PA7-X)*.

Within the proposed *Policy Area*, in addition to the permitted uses of *Rural Employment Areas*, as provided in Section 6.8.2 of the Official Plan, retail and gas bar uses are also permitted. This includes retail commercial uses that are normally found in primary and secondary urban centres.

Further, within the *Policy Area*, landowners will be required to enter into a Development Agreement with the municipality to ensure the appropriate sewage and water servicing is in place prior to permanent year-round occupation being permitted.

Development will also be required to incorporate land use compatibility measures per Section 6.8.3 of the Official Plan to mitigate any potential adverse effects on surrounding land uses. Class III industrial uses, medical marijuana production facility, and sawmill uses will be strictly prohibited on the subject site.

The purpose of this Planning Justification Report is to provide,

- » An overview of the subject site and local area context;
- » A review of the applicable land use planning policy and regulatory frameworks;
- » A description of the proposed built form, uses, and development statistics;
- » A summary of supporting studies and technical reports; and,
- » A rationale for the proposed amendments to the Official Plan and Zoning By-law.

A Pre-Consultation Meeting was held on August 21, 2025, to receive preliminary feedback from staff and to confirm the submission requirements. This report has been prepared per the Township of Puslinch's Pre-Consultation Meeting Comment Summary (and accompanying attachments) that was received following the meeting. Summaries of technical reports and studies completed to support the OPA and ZBA application are provided in Section 5.0 of this report.

## 2.0 Site & Surroundings

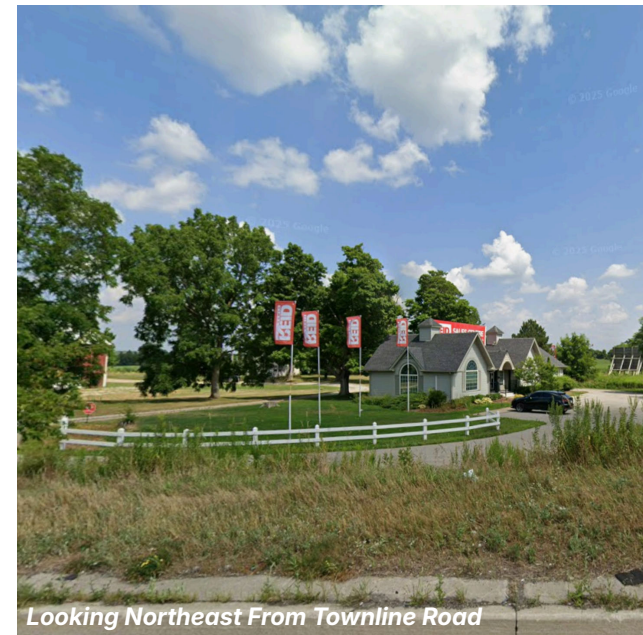
### 2.1 The Site

The subject site is located directly north of Highway 401, south of Ellis Road, and east of Townline Road in Ward 7 of the Township of Puslinch (see *Figure 1*).

The site has a generally rectangular shape with an approximate area of 337,346 m<sup>2</sup> (34 hectares). The site's frontages along Townline Road and Ellis Road are approximately 780 meters and 400 meters, respectively. Currently, most of the site is occupied

by an agricultural field. In the southwestern corner of the site is a driveway, a one-storey development showroom with a small surface parking lot, and a farm, which includes a barn and a two-storey detached dwelling.

The site is not listed on the Heritage Register and is not a designated heritage site.



Looking Northeast From Townline Road



Looking East From Townline Road



Looking North From Highway 401 Off-Ramp

FIGURE 2. Existing Site Conditions

## 2.2 Planning History

There are no previous Official Plan or Zoning By-law Amendment applications pertaining to the site. There are similarly no prior applications or approvals through the Committee of Adjustment associated with the site.

An informal pre-consultation meeting pertaining to the development of the site was held on September 21st, 2023. An official pre-consultation meeting was held August 21st, 2025. Over the past two years, the client has regularly engaged with staff of the County of Wellington and Township of Puslinch regarding the intent, design, and economic viability of the proposed development.

## 2.3 Surrounding Land Uses

### 2.3.1 Area Context

The subject site is located on the border of the Township of Puslinch and City of Cambridge. Lands within the Township of Puslinch are predominantly agricultural and natural areas, however, directly east of the site is the Puslinch Golf Club, which was built in 1962. South of Highway 401 is Puslinch Lake, which includes a trailer resort/campground and low-rise residential uses in close proximity.

Directly west of the site is the Hespeler Village neighbourhood of the City of Cambridge. The neighbourhood is comprised of low-rise residential dwellings, schools, places of worship and community amenities. This includes the Hespeler Memorial Arena, YWCA childcare centres, a sports stadium, places of worship, retail and community amenities, outdoor sports fields and parks and open space. Lands adjacent to Highway 401 include: several retail plazas, shops and restaurants; a gas station; hotels; commercial and industrial buildings (including office uses); recreational uses (including a gymnastics club and rock-climbing gym); and warehouses.

Southwest of the site is an employment area comprised primarily of industrial uses.

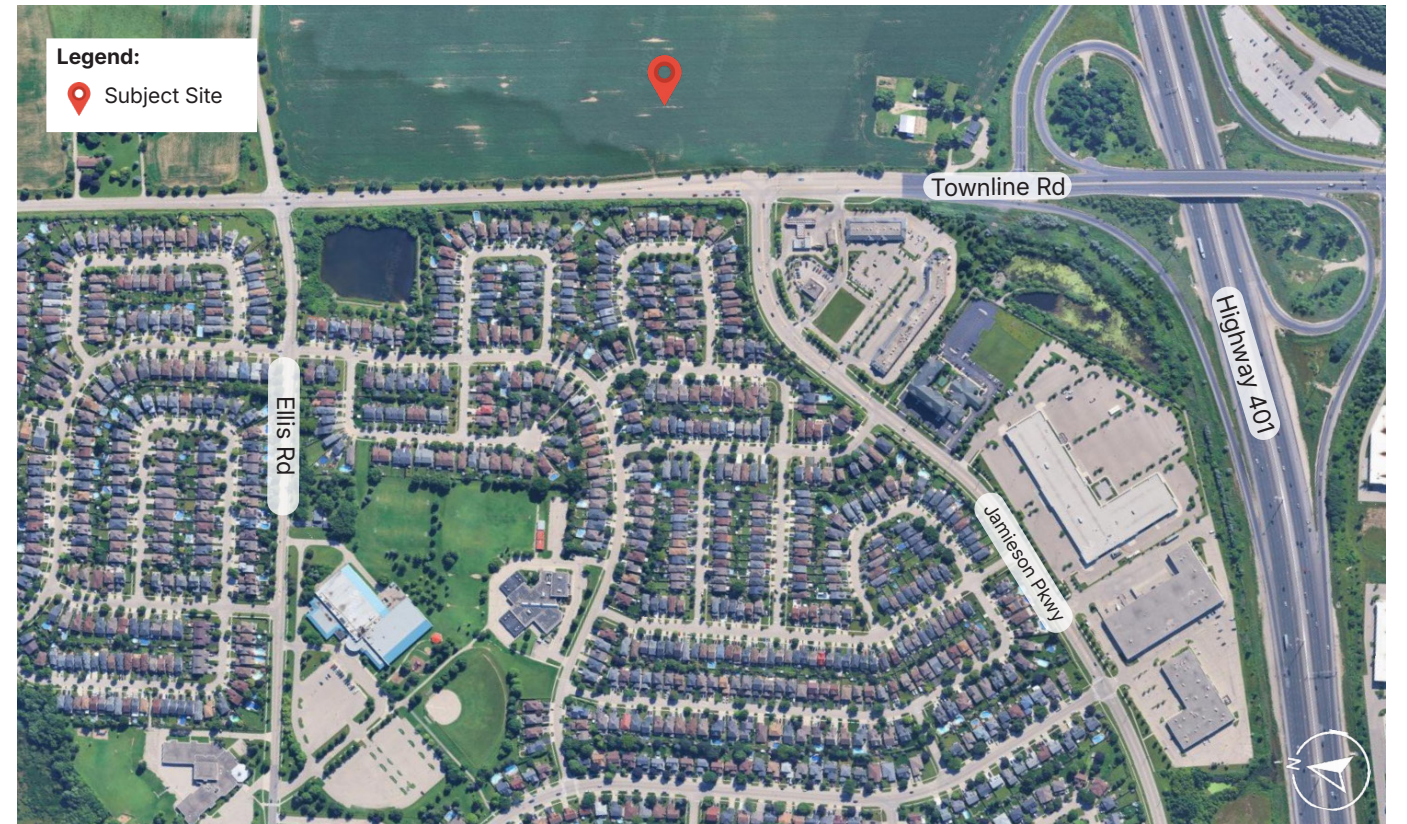


FIGURE 3. Adjacent Development, including Puslinch Golf Club (Source: Puslinch Golf Club), the Hespeler Village Neighbourhood, and Commercial Plaza.



FIGURE 4. Hespeler Village Neighbourhood, City of Cambridge (Source: Google Earth and Hespeler Village BIA)



FIGURE 5. Hespeler Memorial Arena and Hespeler Optimist Park, City of Cambridge (Source: City of Cambridge)



FIGURE 6. Commercial and Industrial Buildings along Jamieson Parkway (Source: Google Earth and CRD Construction).



FIGURE 7. Context Map

**Legend:**

□ Subject Site

**Per City of Cambridge Map 2  
General Land Use Plan  
(September 2018 Consolidation)**

- Low / Medium Density Residential
- Employment Corridor
- Business Industrial
- Hespeler Village
- Township of Puslinch City of Cambridge Boundary

**Context Map**

- Agricultural
- Bus Lines
- Highway
- Arterial Road

### 2.3.2 Immediate Surroundings

The site is surrounded by the following uses:

- North » A farm, including a barn, and low-rise dwellings
- East » Puslinch Golf Club  
» Further east are low-rise dwellings
- South » Highway 401  
» South of the highway on the east side of Townline Road is a commuter parking lot, vacant lands occupied by woodlots, and low-rise dwellings.  
» South of the highway on the west side of Townline Road is a prestige industrial centre (LG Lovell Industrial Park).
- West » Low-rise dwellings, a one-storey retail plaza and surface parking lot, a six-storey hotel, and commercial and industrial businesses and offices.  
» The neighbourhood includes Optimist Park, Hespeler Memorial Arena, two YWCA Cambridge Child Care Centres, and New Hope Cemetery further west.



FIGURE 8. Site and Surrounding Area

## 2.4 Nearby Development Activity

Within the Township of Puslinch, there is one active development application within 5 kilometers of the site (as of September 18, 2025). Within the City of Cambridge, there are several active development applications within 5 kilometers of the site (as of October 21, 2025). Of note, the Hespeler Village neighbourhood is directly west of the site and

is a fully developed suburban area comprised of detached dwellings, parks, community and recreational facilities, retail plazas, and pockets of commercial and industrial businesses and offices.

Table 1 provides details of nearby active development applications.

TABLE 1. Surrounding Development Applications

Address	Location Relative to Site	Description	Application Number	Status
6639 Wellington Road 34, Puslinch	~2.0 km northeast	Consent application proposing a severance of 0.46 hectares of vacant land for proposed rural residential use.	B38-25	Under Review
2420-2310 Townline Road, Cambridge	~1.0 km south	ZBA application for the removal of a Holding "H" Symbol on industrial lands to facilitate the development of a 148,622 square foot shell building.	R05/25	Under Review
9 Schofield Street, Cambridge	~2.5 km northwest	OPA and ZBA application to facilitate the development of a 6-to-8 storey multi-residential building with 86 units.	OR014/24	Under Review
130 Guelph Avenue, Cambridge	~3.0 km northwest	OPA and ZBA application to facilitate the development of an 8-storey apartment building with 118 units.	OR04/25	Under Review
180 Groh Avenue, Cambridge	~3.0 km west	OPA and ZBA application to facilitate the development of a vacant brownfield site to a townhouse complex consisting of 288 units across 12 blocks.	OR14/21	Under Review
506-510, 516 Hespeler Road and 1000 Langs Avenue, Cambridge	~4.5 km southwest	OPA and ZBA application to facilitate the development of five 20-storey mixed-use buildings, totaling 1,366 units, and comprised of a mix of residential, office, and retail uses. A large public park is also proposed.	OR06/22	Under Appeal

## 2.5 Transportation Network

Schedule B7 of the County of Wellington Official Plan identifies key elements of the transportation network connecting the site to other parts of the Township of Puslinch, County of Wellington, and the wider region.

### 2.5.1 Road Network

**Highway 401** is a Provincial Highway that generally runs northeast-southwest from Windsor to Ottawa. Adjacent to the site, Highway 401 consists of three-to-four lanes in each direction.

A cloverleaf interchange is located directly south of the site at the intersection of Townline Road and Highway 401. The Highway 401 westbound on-ramp is located less than 20 metres from the site and the eastbound on-ramp is located approximately 300 metres to the south.

Other key interchanges are provided 4 kilometers to the west at Highway 24 (Hespeler Road) and 9 kilometers to the east at Highway 6 (Guelph Line North).

**Townline Road** is a Regional/County Road that runs north-south from Blackbridge Road and Roszell Road to Avenue Road and Gore Road. The road serves as a major connector through Cambridge and Puslinch that links the northern and southern regions of each municipality. The road is typically one lane in each direction with paved shoulders but expands to two lanes in each direction near Highway 401 (along approximately 400 m of the site's frontage). Townline Road provides a critical connection to and from Highway 401 and nearby developments, including the Hespeler Village neighbourhood and LG Lovell Industrial Park.

Of note, at the intersection of Townline Road and Jamieson Parkway is a stubbed paved area, which may indicate prior consideration for a future eastward expansion of Jamieson Parkway through the site.

**Ellis Road** is a single-lane, two-way rural road that runs east-west from Cooper Street to Sideroad 10 N. The intersection of Townline Road and Ellis Road is a signalized four-way stop.



FIGURE 9. Highway 401 Cloverleaf Interchange at Townline Road.

## 2.5.2 Transit Network

Due to the site's location on the border of the Township of Puslinch and City of Cambridge, it is serviced by two transportation networks: RIDE WELL and Grand River Transit. These networks increase access and connectivity to the proposed development while expanding the labour pool.

### RIDE WELL

The County of Wellington provides on-demand, publicly funded, rural transit service through RIDE WELL. RIDE WELL is a ridesharing service that offers door-to-door transportation Monday to Friday from 6:00 am to 7:00 pm throughout Minto, Wellington North, Mapleton, Centre Wellington, Erin, Guelph Eramosa, and Puslinch. Access to the City of Guelph is provided if trips begin or end within Wellington County.

### Grand River Transit

Grand River Transit is a public transit service operated by the Region of Waterloo. It provides light rail transit and bus service throughout Waterloo, Kitchener, and Cambridge, including to St. Jacobs, the University of Waterloo, Conestoga College, and Sportsworld.

The site is serviced by Route 51 – Hespeler, which provides north-south service along Ainslie Street and Hespeler Road from the Ainslie Terminal to just north of Pinebrush Station. The service runs daily from approximately 6:00 am to 12:00 am.

Bus stops at the intersection of Jamieson Parkway and Townline Road provide access to Route 51B, which extends the service of Route 51 further north into the subdivision north of Highway 401 and west of Townline Road.

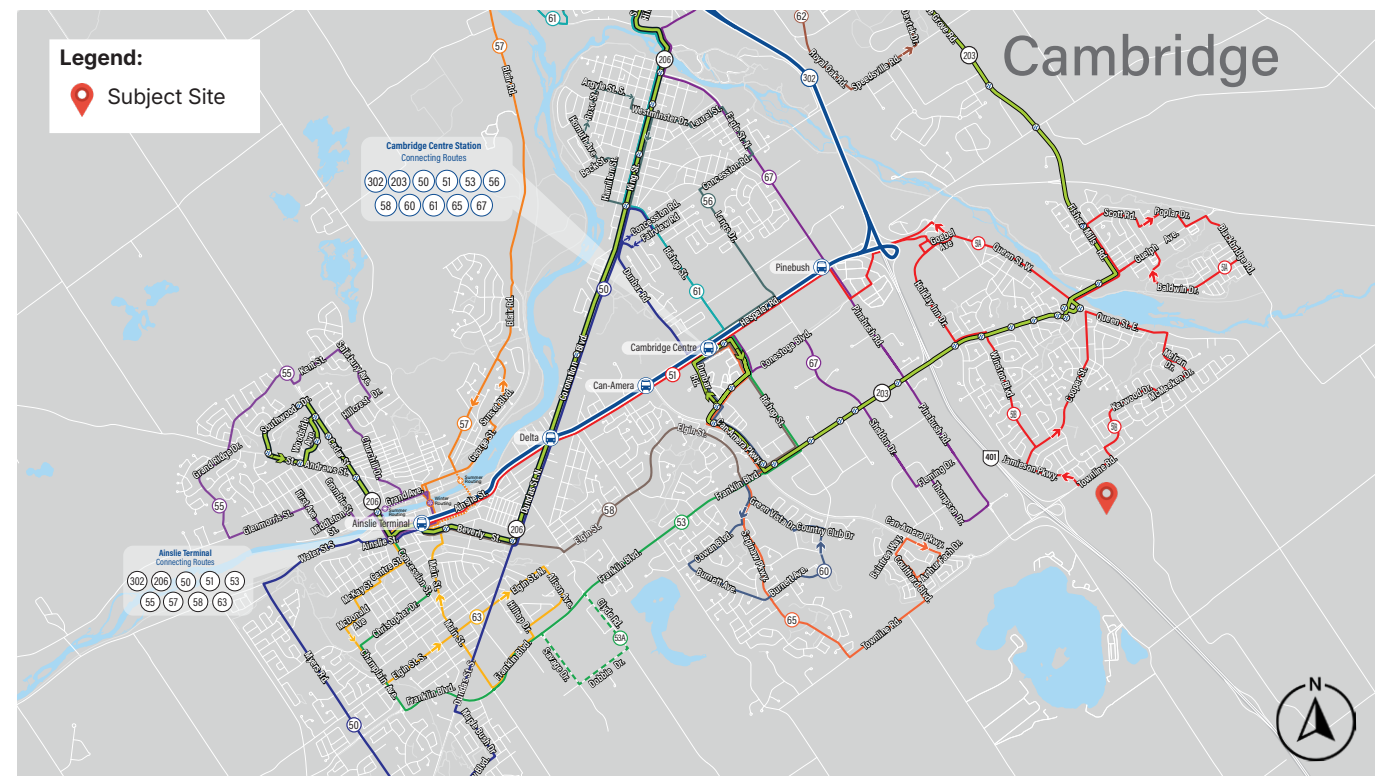


FIGURE 10. Southern Extent of the Grand River Transit Network and Site Location.

## 3.0

# Proposal

### 3.1 Development Overview

The proposed prestige industrial development at 2809 Townline Road adds much-needed employment uses to the County of Wellington and Highway 401 economic corridor, which serves a vital role in connecting Southern Ontario with Eastern Canada and the United States. The proposal targets the provision of over 94,000 m<sup>2</sup> of new industrial and retail space that will increase employment opportunities within the Township of Puslinch and greater region. The site's location at Highway 401 and Townline Road's cloverleaf interchange is highly desirable to the proposed uses as it expands access to labour, goods, and services to the greater region and beyond. Further, the site's proximity to Aberfoyle, Morriston, Guelph, and Cambridge supports job growth and employment opportunities across the region.

The proposed prestige industrial development, as provided by Site Plan A and Site Plan B, consists of three stand-alone industrial buildings, three multi-tenant industrial buildings, and surface parking lots. The three stand-alone industrial buildings, each with a footprint of approximately 16,200 m<sup>2</sup>, are located at the northern extent of the site. Each of these buildings is designed to provide approximately 46 loading docks at their rear and parking spaces for nearly 150 vehicles.

Towards the middle of the site are three multi-tenant industrial buildings, each with 11 units and a footprint between 9,814 m<sup>2</sup> and 10,427 m<sup>2</sup>. Each industrial unit is proposed to be between 890 m<sup>2</sup> and 950 m<sup>2</sup> and provide a variety of commercial and employment offerings. A loading zone is provided at the rear of each unit.

Site Plan A (the preferred scenario) proposes a prestige industrial centre comprised of a large

format retail store, gas bar, and six industrial buildings ("Site Plan A"). The retail store is proposed to have a building footprint of 15,090 m<sup>2</sup>. A total of 2,354 vehicular parking spaces are proposed.

Site Plan B proposes two additional industrial buildings (in place of a retail store and gas bar). Each industrial building has a footprint of 19,510 m<sup>2</sup> and thirty-three (33) docks, and is supported a total of 1,240 vehicular parking spaces.

TABLE 2. Site Statistics

DESCRIPTION	STATISTICS	
Site Area	337,346 m <sup>2</sup>	
Total Gross Building Area (GBA)	Site Plan A: 94,358 m <sup>2</sup>	Site Plan B: 118,288 m <sup>2</sup>
Industrial (Large Format) (GBA)	16,200 m <sup>2</sup> x 3 buildings (48,600 m <sup>2</sup> )	
Industrial (Multi-Tenant) (GBA)	10,427 m <sup>2</sup> x 2 buildings (20,854 m <sup>2</sup> )	9,814 m <sup>2</sup> x 1 building (9,814 m <sup>2</sup> )
Retail (Site Plan A Only) (GBA)	15,090 m <sup>2</sup> x 1 building (15,090 m <sup>2</sup> )	
Industrial (Site Plan B Only) (GBA)	19,510 m <sup>2</sup> x 2 buildings (39,020 m <sup>2</sup> )	
PROPOSED PARKING	SITE PLAN A	SITE PLAN B
Vehicular	2,354	1,240
Barrier Free	80	58
Bicycle	178	240

Note: All building heights and setbacks are compliant with current zoning by-law regulation requirements, including lot area, frontage, and coverage regulations.



FIGURE 11. Site Plan A for 2809 Townline Road.

ZONING MATRIX		
ITEM	PROPOSAL	EXISTING
ZONING CATEGORY	INDUSTRIAL (IND)	AGRICULTURAL (A)
GROSS SITE AREA (m <sup>2</sup> )	337,346 m <sup>2</sup> (83.7ha)	
TOTAL GROSS FLOOR AREA (m <sup>2</sup> )	94,358.00	N/A
ZONING REQUIREMENTS		
MINIMUM REQUIRED LOT AREA (HA)	33.7	0.4
MINIMUM REQUIRED LOT FRONTAGE (m)	752	30
MINIMUM REQUIRED FRONT YARD (m)	46	6
MINIMUM REQUIRED INTERIOR SIDEYARD (m)	36	5
INTERIOR SIDE YARD ADJACENT TO RESIDENTIAL ZONE (m)	N/A	15
MINIMUM REQUIRED EXTERIOR SIDEYARD (m)	141	15
MINIMUM REQUIRED REAR YARD SETBACK (m)	21	7.5
REAR YARD ADJACENT TO RESIDENTIAL ZONE (m)	N/A	15
MAXIMUM PERMITTED LOT COVERAGE (%)	28%	75%
MAXIMUM PERMITTED BUILDING HEIGHT (m)	25	25
MINIMUM REQUIRED LANDSCAPED OPEN SPACE	17%	15%
BUFFER IF ADJACENT TO RESIDENTIAL ZONE BOUNDARY (m)	N/A	1.5
MTO SETBACK (m)	14	14
BUILDING REQUIREMENTS		
BUILDING FLOOR AREA		
BUILDING 1	INDUSTRIAL (5% OFFICE) TOTAL	15,390.00 / 810.00 / 16,200.00
BUILDING 2	INDUSTRIAL (5% OFFICE) TOTAL	15,390.00 / 810.00 / 16,200.00
BUILDING 3	INDUSTRIAL (5% OFFICE) TOTAL	15,390.00 / 810.00 / 16,200.00
BUILDING 4	INDUSTRIAL (10% OFFICE) TOTAL	9,384.00 / 1,043.00 / 10,427.00
BUILDING 5	INDUSTRIAL (10% OFFICE) TOTAL	9,384.00 / 1,043.00 / 10,427.00
BUILDING 6	INDUSTRIAL (10% OFFICE) TOTAL	8,833.00 / 981.00 / 9,814.00
RETAIL STORE		15,090.00
TOTAL AREA		94,358.00
PARKING REQUIREMENTS		
Building 1-6:	Parking stall ratio: 1/100 m <sup>2</sup> for the first 10,000 m <sup>2</sup> of floor area and 1/200 m <sup>2</sup> for any floor area after the first 10,000 m <sup>2</sup>	
Office:	1/400 m <sup>2</sup>	
Bicycle:	Ratio: 1/200 m <sup>2</sup> for industrial uses and 2 or 1/1000 m <sup>2</sup> for retail uses, whichever is greater	
Retail Store:	1/200 m <sup>2</sup>	
Gas Pump:	1/Pump	
Barrier-free stalls:	1 stall if the total number of parking stalls is between 3 and 25 stalls. 1 stall + 3% if the total number of parking stalls is between 26 and 100 stalls. 4 stalls + 2% if the total number of parking stalls is between 101 and 200 stalls. 8 stalls + 2% if the total number of parking stalls is equal to or greater than 201 stalls	
Loading Spaces:	0 spaces for buildings less than 250 m <sup>2</sup> 1 space for buildings between 250 m <sup>2</sup> and 2,500 m <sup>2</sup> 2 spaces for buildings greater than 2,500 m <sup>2</sup> and less than 5,000 m <sup>2</sup> 3 + 1 additional space for each 10,000 m <sup>2</sup> in excess of 5,000 m <sup>2</sup> for buildings greater than 5,000 m <sup>2</sup>	
PARKING STALL DIMENSIONS		
	PROPOSED	REQUIRED
BUILDING 1	147	147
BUILDING 2	149	147
BUILDING 3	149	147
BUILDING 4	140	120
BUILDING 5	140	120
BUILDING 6	138	113
RETAIL STORE	1478	755
GAS PUMP	13	12
TOTAL NO. OF PARKING SPACES	2354	1561
REQ. BARRIER-FREE PARKING SPACES (BUILDING 1)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 2)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 3)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 4)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 5)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 6)	7	7
REQ. BARRIER-FREE PARKING SPACES (RETAIL STORE)	38	38
REQ. LOADING SPACES (BUILDING 1)	46	4
REQ. LOADING SPACES (BUILDING 2)	46	4
REQ. LOADING SPACES (BUILDING 3)	46	4
REQ. LOADING SPACES (BUILDING 4)	11	4
REQ. LOADING SPACES (BUILDING 5)	11	4
REQ. LOADING SPACES (BUILDING 6)	11	4
REQ. LOADING SPACES (RETAIL STORE)	4	4
REQ. BICYCLE SPACES (BUILDING 1)	32	32
REQ. BICYCLE SPACES (BUILDING 2)	32	32
REQ. BICYCLE SPACES (BUILDING 3)	32	32
REQ. BICYCLE SPACES (BUILDING 4)	22	21
REQ. BICYCLE SPACES (BUILDING 5)	22	21
REQ. BICYCLE SPACES (BUILDING 6)	20	20
REQ. BICYCLE SPACES (RETAIL STORE)	18	15



FIGURE 12. Site Plan B for 2809 Townline Road.

ZONING MATRIX		
LEGAL NAME: PART LOT 1, CONCESSION 2, PUSLINCH, PARTS 1, 2 & 3 61R2992 AND AS IN ROS257095 SOUTH OF M547320; EXCEPT PART 2 61R642, PART 1 61R6501, PARTS 1 & 2 61R2843, PARTS 1, 2, 3, 5, 6, 7 & 8 61R9198, PART 1 61R9263, PART 1 61R9689 AND PART 1 EXPROPRIATION PLAN WCS05537; 1/4N RD0693735; TOWNSHIP OF PUSLINCH		
ITEM	PROPOSAL	EXISTING
ZONING CATEGORY	INDUSTRIAL (IND)	AGRICULTURAL (A)
GROSS SITE AREA (m <sup>2</sup> )	337,346 m <sup>2</sup> (83.7ha)	
TOTAL GROSS FLOOR AREA (m <sup>2</sup> )	118,288.00	N/A
MINIMUM REQUIRED LOT AREA (HA)	PROPOSED	REQUIRED
MINIMUM REQUIRED LOT FRONTAGE (m)	33.7	0.4
MINIMUM REQUIRED FRONT YARD (m)	752	30
MINIMUM REQUIRED INTERIOR SIDE YARD SETBACK (m)	41	6
MINIMUM REQUIRED INTERIOR SIDE YARD SETBACK (m)	36	5
INTERIOR SIDE YARD ADJACENT TO RESIDENTIAL ZONE (m)	N/A	15
MINIMUM REQUIRED EXTERIOR SIDEYARD (m)	55	15
MINIMUM REQUIRED REAR YARD (m)	47	7.5
REAR YARD ADJACENT TO RESIDENTIAL ZONE (m)	N/A	15
MAXIMUM PERMITTED LOT COVERAGE (%)	35%	75%
MINIMUM REQUIRED LANDSCAPED OPEN SPACE	25	25
MAXIMUM PERMITTED BUILDING HEIGHT (m)	N/A	25
BUFFER IF ADJACENT TO RESIDENTIAL ZONE (m)	N/A	1.5
YTO SETBACKS (m)	14	14
BUILDING FLOOR AREA		
<b>BUILDING 1</b>	m <sup>2</sup>	
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
<b>BUILDING 2</b>	m <sup>2</sup>	
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
<b>BUILDING 3</b>	m <sup>2</sup>	
INDUSTRIAL	15,390.00	
(5%) OFFICE	810.00	
TOTAL	16,200.00	
<b>BUILDING 4</b>	m <sup>2</sup>	
INDUSTRIAL	9,384.00	
(10%) OFFICE	1,043.00	
TOTAL	10,427.00	
<b>BUILDING 5</b>	m <sup>2</sup>	
INDUSTRIAL	9,384.00	
(10%) OFFICE	1,043.00	
TOTAL	10,427.00	
<b>BUILDING 6</b>	m <sup>2</sup>	
INDUSTRIAL	8,833.00	
(10%) OFFICE	981.00	
TOTAL	9,814.00	
<b>BUILDING 7</b>	m <sup>2</sup>	
INDUSTRIAL	18,534.50	
(5%) OFFICE	975.50	
TOTAL	19,510.00	
<b>BUILDING 8</b>	m <sup>2</sup>	
INDUSTRIAL	18,534.50	
(5%) OFFICE	975.50	
TOTAL	19,510.00	
<b>TOTAL AREA</b>	118,288.00	

PARKING REQUIREMENT		
<b>Building 1-6:</b> Parking stall ratio: 1/100 m <sup>2</sup> for the first 10,000 m <sup>2</sup> of floor area and 1/200 m <sup>2</sup> for any floor area after the first 10,000 m <sup>2</sup>		
Business/Professional Office: 1/40 m <sup>2</sup>		
Bicycle space (0.6x1.8m) ratio: 2/1000 m <sup>2</sup> for industrial uses		
<b>Barrier-free stalls:</b> 1 stall if the total number of parking stalls is between 3 and 25 stalls. 1 stall + 3% if the total number of parking stalls is between 26 and 100 stalls. 4 stalls + 2% if the total number of parking stalls is between 101 and 200 stalls. 8 stalls + 2% if the total number of parking stalls is equal to or greater than 201 stalls		
<b>Loading Spaces:</b> 0 spaces for buildings less than 250 m <sup>2</sup> 1 space for buildings between 250 m <sup>2</sup> and 5,000 m <sup>2</sup> 2 spaces for buildings greater than 5,000 m <sup>2</sup> and less than 5,000 m <sup>2</sup> 3 + 1 additional space for each 10,000 m <sup>2</sup> in excess of 5,000 m <sup>2</sup> for buildings greater than 5,000 m <sup>2</sup>		
PARKING STALL DIMENSIONS		STANDARD: 3.0 m x 6.0 m
		BARRIER-FREE: 3.6 m x 6.0 m
		LOADING SPACE: 3.5 x 10m
	PROPOSED	REQUIRED
BUILDING 1	147	147
BUILDING 2	149	147
BUILDING 3	149	147
BUILDING 4	140	120
BUILDING 5	140	120
BUILDING 6	138	113
BUILDING 7	188	167
BUILDING 8	189	167
<b>TOTAL NO. OF PARKING SPACES</b>	1240	1128
REQ. BARRIER-FREE PARKING SPACES (BUILDING 1)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 2)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 3)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 4)	6	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 5)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 6)	7	7
REQ. BARRIER-FREE PARKING SPACES (BUILDING 7)	9	8
REQ. BARRIER-FREE PARKING SPACES (BUILDING 8)	8	8
REQ. LOADING SPACES (BUILDING 1)	46	4
REQ. LOADING SPACES (BUILDING 2)	46	4
REQ. LOADING SPACES (BUILDING 3)	46	4
REQ. LOADING SPACES (BUILDING 4)	11	4
REQ. LOADING SPACES (BUILDING 5)	11	4
REQ. LOADING SPACES (BUILDING 6)	11	4
REQ. LOADING SPACES (BUILDING 7)	33	4
REQ. LOADING SPACES (BUILDING 8)	33	4
REQ. BICYCLE SPACES (BUILDING 1)	32	32
REQ. BICYCLE SPACES (BUILDING 2)	32	32
REQ. BICYCLE SPACES (BUILDING 3)	32	32
REQ. BICYCLE SPACES (BUILDING 4)	22	21
REQ. BICYCLE SPACES (BUILDING 5)	22	21
REQ. BICYCLE SPACES (BUILDING 6)	20	20
REQ. BICYCLE SPACES (BUILDING 7)	40	39
REQ. BICYCLE SPACES (BUILDING 8)	40	39

### 3.1.1 Site Layout and Connectivity

The proposed prestige industrial development consists of three stand-alone industrial buildings and three multi-tenant industrial buildings. As part of Site Plan A, a large-format retail store and gas bar are proposed. As part of Site Plan B, two additional industrial buildings are proposed, as described above.

The industrial buildings are located at the northern end of the site, near Ellis Road; the multi-tenant industrial buildings are located at the centre of the site, north of Jamieson Parkway. The retail store and gas bar of Site Plan A, and two additional industrial buildings of Site Plan B, are located on the southern portion of the site, north of Highway 401.

The main entrance to the site is at the intersection of Townline Road and Jamieson Parkway, which is approximately 250 meters north of Townline Road's access ramps to Highway 401. As part of the proposal, an internal 12 meter drive aisle will extend Jamieson Parkway eastward through the site. To reduce traffic and increase vehicle flows throughout the site, one additional access point to the site is provided from Townline Road. The buildings are arranged to create a distinct sense of place that establishes the site as a "Gateway to Puslinch".

At grade, the buildings are generously setback by more than 20 meters from all property lines. The setbacks include landscaped buffers along Highway 401, Townline Road, Ellis Road, and Puslinch Golf Club. In particular, along Townline Road significant landscaped buffers are proposed to support enhanced setbacks and screening of industrial operations.

As part of a future site plan control application to the Township of Puslinch, additional details on the proposed development will be finalized, including the precise location of access driveways, parking, and walkways, lighting, landscaping, and garbage and handling areas.

### 3.1.2 Massing and Built Form

The prestige industrial proposal complies with all *Industrial* (IND) massing and built-form zone standards per the Township of Puslinch Zoning By-law and reflects the Township's Design Guidelines. All buildings are proposed to be between 8 to 12 meters in height, in compliance with current zoning regulations (where a maximum height of 25 meters is permitted) and to ensure compatibility with surrounding land uses and development.

Buildings are broken into smaller volumes to reduce visual impact and support a more traversable and pedestrian friendly environment. Further, buildings with frontages along Townline Road will be designed with storefront style facades to create more active frontages. The proposed lot coverage for Site Plan A and Site Plan B is 28% and 35%, respectively, which is significantly below the permitted maximum of 75%.

Within both the Site Plan A and Site Plan B proposals, the buildings are oriented and positioned to be context-sensitive and comply with minimum front, exterior side, and rear yard setback requirements for *Industrial* zones. Whereas a minimum front yard of 6 meters, exterior side yard of 15 meters, and rear yard of 7.5 meters are required, yards of over 25 meters, 35 meters, and 21 meters are provided, respectively.

### 3.1.3 Servicing

The site is generally flat with a total change in elevation of 11 meters. The highest point on the site is towards the southeast, while the lowest point is towards the northwest.

The servicing plan proposes a watermain that will loop around the centre of the site and connect to the existing municipal watermain along Townline Road. Should municipal water servicing not be attained through the existing watermain, the site can be serviced by private water supply, as outlined in the Crozier Private Servicing Assessment.

With regard to sanitary services, the proposed industrial buildings are proposed to connect to a septic bed and advanced treatment block along the west side of the site, adjacent to Townline Road. The retail store and gas bar are proposed to have sanitary sewers that connect and flow out of the site perpendicular to Townline Road, extending to connect to the existing sanitary on Jamieson Parkway.

Since a significant area of the site is proposed to be developed as a paved vehicle parking lot, efficient stormwater management will be critical. Access points to storm sewers are proposed across the site, with connections to a new stormwater management cistern that will be located along the eastern property line, on the north end of the site.

Additional information on the proposed servicing plan is provided in Section 5.0.

## 3.2 Required Approvals

The subject site is designated *Secondary Agricultural* per Schedule B7 – Land Use (Puslinch) of the County of Wellington Official Plan. In these areas, agriculture will continue to be the dominant use, but other uses are permitted, including residential and employment uses, as long as they do not adversely impact existing agricultural operations and keep with the rural character of the area.

The site is zoned *Agricultural (A)* per the Township of Puslinch Comprehensive Zoning By-law No. 023-18. In these zones, permitted uses include agricultural-related uses, bed and breakfasts, conservation use, daycare centers, single detached dwellings, group homes, farm-related businesses, farmer markets and farm product sales outlets, home industry, and other uses.

Amendments to the County of Wellington Official Plan and Township of Puslinch Zoning By-law are required to permit the proposed development. The proposed land use designation is *Rural Employment Area* within a new *Policy Area (PA7-X)*, and the proposed zone is *Industrial (IND)*. Site-specific special provisions are proposed to permit the proposed retail store and gas bar uses on the southern end of the site, as detailed in Site Plan A.

Further, within the *Policy Area*, landowners will be required to enter into a Development Agreement with the municipality to ensure the appropriate sewage and water servicing is in place prior to permanent year-round occupation being permitted.

The proposed development will also require a Site Plan Control Application, which will be filed at a later date.

## 3.3 Public Consultation

Public consultation relating to this project will follow the requirements set out in the *Planning Act* and County of Wellington's standard planning approvals process. Stakeholders and the public will be engaged throughout the development process via written channels, and community and ward meetings.

Application materials will be made available both online and in-person, and an application notice sign will be posted on the subject site and updated throughout the development process as required. A statutory public meeting will be held following the application submission. *The Planning Act* requires public notice of any meetings relating to the development to be circulated.

## 4.0

# Policy Framework

The following sub-sections provide an overview of the provincial, regional, and municipal planning policies that apply to the site. This discussion outlines how the proposed development is consistent with the Provincial Planning Statement (2024), conforms to the County of Wellington Official Plan (WOP), and has regard for the criteria outlined in the *Puslinch by Design Employment Land Study*.

## 4.1 Planning Act R.S.O. 1990, c. P.13

The Planning Act R.S.O. 1990, c. P.13 (*Planning Act*) is provincial legislation that establishes procedural rules for land use planning in Ontario. It enables municipalities to control land use and provides the tools, processes and mechanisms to exercise this control.

Section 2 of the *Planning Act* outlines matters of provincial interest that approval authorities must have regard for when carrying out their responsibilities. Matters that apply to the proposed development include:

- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
- (h) the orderly development of safe and healthy communities;
- (k) the adequate provision of employment opportunities;
- (p) the appropriate location of growth and development;
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;
- (r) the promotion of built form that is well-designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant.

Section 3(5) of the *Planning Act* states that planning decisions must be consistent with ministerial policy statements and conform or not conflict with provincial plans that are in effect on that date.

### Summary

The proposed development of the site has regard for the *Planning Act* and matters of provincial interest. The site is an appropriate location for growth as it makes efficient use of provincial and regional infrastructure. In particular, the site's location adjacent to a Highway 401 cloverleaf interchange is particularly strategic for the proposed industrial uses, as proximity to the highway increases connections and access to regional goods and services. The development contributes towards the development of safe, healthy, and complete communities through the provision of new employment opportunities near where people live. Further, the development is well-designed to encourage a distinct sense of place and fit within the existing surrounding context.

## 4.2 Provincial Planning Statement 2024

The *Provincial Planning Statement (PPS)* is a provincial policy document that establishes a planning and land use framework applicable across Ontario. The *PPS* came into effect on October 20, 2024, replacing both the *Provincial Policy Statement (2020)* and the *Growth Plan for the Greater Golden Horseshoe (2019)*. The *Planning Act* requires all decisions affecting planning matters to be consistent with the *PPS*.

The vision outlined in Chapter 1 of the *PPS* emphasizes the importance of increasing the supply of housing to support growth and long-term prosperity. It emphasizes the importance of prioritizing compact, *transit-supportive design* and optimizing investments in *infrastructure and public service facilities* to support convenient access to housing, quality employment, services, and recreation opportunities (Chapter 1: Introduction, Vision, paragraphs 1 to 4).

The *PPS* highlights that Ontario will support a competitive economy that is recognized for its “*influence, innovation, and diversity*” and that the economy will mature into a centre of global significance for commerce and industry. Growth will be prioritized within urban and rural settlement areas to protect the long-term viability of *rural areas* and the *agri-food network* (Chapter 1: Introduction, Vision, paragraphs 3 and 5).

According to the *PPS*, municipal official plans are the most important tool for implementing the vision and objectives of the *PPS* and achieving comprehensive and integrated long-term planning. Further, the *PPS* describes that official plans should coordinate cross-boundary matters to ensure the actions of planning authorities complement one another and result in mutually beneficial outcomes.

Per Chapter 2, planning authorities are to support the achievement of *complete communities* by accommodating an appropriate range and mix of

land uses, including employment uses, to meet long-term needs (Policy 2.1.6). *Settlement areas* are to be the focus of growth and development (Policy 2.3.1.1), and planning authorities are to support general *intensification* and *redevelopment* to support the achievement of *complete communities* (Policy 2.3.1.3). Although the site is not within a *settlement area* of the County of Wellington, it abuts an urban area of the City of Cambridge to the west. Per the definitions of the *PPS*, the site is within a *rural area*.

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 promoting diversification of the economic base and employment opportunities.

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 but not limited to 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;*

*Employment areas* are for clusters of business and economic activities, including manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. The proposed retail store of Site Plan A would operate within a warehouse, provide broader mixed uses on site to meet long-term needs, and provide new employment opportunities to the surrounding community.

Chapter 3 of the *PPS* addresses matters related to the provision of *infrastructure* and municipal services. Policy 3.2.2 encourages the efficient use of existing and planned transportation *infrastructure* through the use of *transportation demand management* strategies, where feasible. The proposed development is in proximity to existing hard and soft infrastructure, thereby requiring minimal new infrastructure. For example, the site abuts a regional road and the built-out Hespeler Village neighbourhood to the west, Puslinch Golf Club to the east, and the cloverleaf interchange of Highway 401 to the south.

Section 3.6 of the *PPS* provides policies for sewage, water, and stormwater. Planning for sewage and water services is to accommodate forecasted growth and promote the efficient use of existing services. Services are to be provided in a sustainable manner that promotes water conservation, protects the quality and quantity of water, and is feasible and financially viable (Policy 3.6.1).

Where municipal sewage and water services are not available, private communal services are the preferred form of servicing for multi-unit/lot development (Policy 3.6.3). Where municipal and private services are not available, planned, or feasible, individual on-site services may be provided if site conditions support the long-term provision of the services (Policy 3.6.4).

Stormwater management is to minimize erosion, changes to water balance, contaminant loads, and stormwater volumes, and be integrated with planning for water and sewage services (Policy 3.6.8).

Municipal servicing of the site is actively being pursued and is currently under review with the City of Cambridge. If municipal water and sewage servicing cannot be attained through an existing watermain, private water servicing will be pursued. Sanitary servicing is proposed to be provided via an onsite sewage system, as outlined in Crozier's Private Servicing Assessment, dated November 10, 2025.

Policies pertaining to agricultural lands are provided in Section 4.3 of the *PPS*. Although the site is considered *prime agricultural* land per the *PPS*, the site is designated *Secondary Agricultural* per the County of Wellington Official Plan. Generally, lands designated as *prime agricultural areas* are to be protected for long-term use for agriculture (Policy 4.3.1.3). Per Policy 4.3.5, planning authorities may permit limited non-residential uses in *prime agricultural areas*, provided the following are demonstrated:

1. *the land does not comprise a specialty crop area;*
2. *the proposed use complies with the minimum distance separation formulae;*
3. *there is an identified need within the planning horizon identified in the official plan as provided for in policy 2.1.3 for additional land to accommodate the proposed use; and*
4. *alternative locations have been evaluated, and*
  - i. *there are no reasonable alternative locations which avoid prime agricultural areas; and*
  - ii. *there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.*

## Summary

The proposed development is consistent with the PPS. The prestige industrial proposal contemplates the development of three stand-alone industrial buildings, three multi-tenant industrial buildings, and a large-format retail store that would operate within a warehouse, and gas bar (Site Plan A), or, two additional industrial buildings (Site Plan B), which will increase employment opportunities and more efficiently use existing infrastructure. The site's proximity to a suburban neighbourhood and strong labour pool, and location adjacent to a regional road and cloverleaf interchange of Highway 401 makes it well-suited for industrial and retail uses that will support the development of complete communities where people work near where they live. Further, the site is not a *specialty crop area* and is abutted by developed lands to the west, Highway 401 to the south, and a golf course to the east.

In accordance with the PPS, the proposal diversifies the economic base to meet long-term needs and is a strategic site for investment and employment uses that can support a wide range of economic activities and ancillary uses. Further, the site's proximity to a *major goods movement corridor* (Highway 401) makes it particularly suitable for industrial and retail uses, which require the transport of goods and services throughout the region.

The provision of non-residential uses at the site are supportable as the lands are not a *specialty crop area* and comply with the *minimum distance separation formulae*.

Municipal servicing of the site is actively being pursued. However, if it cannot be attained, private water and sewage servicing will be pursued.

## 4.3 County of Wellington Official Plan

The County of Wellington Official Plan (the "Plan" or "Official Plan") came into effect on May 6, 1999, with the latest office consolidated dated May 2025. The Plan provides the long-term vision and framework that will guide development throughout the County and its local municipalities, including the Township of Puslinch, over a 20-to-30-year horizon. The policies of the Plan are the basis on which the County and other government agencies will make decisions on land use planning matters. The Plan is currently undergoing an Official Plan Review.

### Part 2: Wellington's Planning Vision

Per Section 2.2 of the Plan, the County outlines its commitment to pursue planning policies that achieve a series of objectives. These objectives include but are not limited to the following:

- 2.2.3 Provide opportunities for jobs, commerce and services that are based on population growth;
- 2.2.5 Ensure that County residents have convenient access to commercial uses and services;
- 2.2.8 Ensure cost effective development and land use patterns;
- 2.2.22 Promote energy efficient land use and servicing decisions;

### Part 3: Wellington Growth Strategy

The County of Wellington is expected to grow to approximately 160,000 in 2051, with 89% of population growth taking place in primary urban centres and the remainder being directed to secondary urban centres, hamlets, and secondary agricultural areas (Section 3.1 and 3.2). From 2021 to 2051, total employment is projected to grow from 43,000 to 70,000 within the County (Table 1, Section 3.5). Section 3.1 of the Plan outlines the

County's growth strategy, including its priorities for directing growth. These priorities are as follows:

1. *the majority of growth will be directed to primary urban centres that offer municipal water services and municipal sewage services.*
2. *growth will be limited in primary urban centres, secondary urban centres and hamlets that offer partial, private communal or individual on-site services.*
3. *to a lesser extent, growth will also be directed to secondary agricultural areas.*

The growth objectives of the County of Wellington are provided in Section 3.3 of the Plan and include, but are not limited to the following:

- » *to encourage efficient cost effective development patterns;*
- » *to take advantage of capacities in existing and planned water, waste water, utilities and transportation systems to support the achievement of complete communities through a more compact built form;*
- » *to maintain a healthy balance between jobs and housing in order to reduce the need for long-distance commuting, and increase the modal share of walking and cycling, where appropriate; and,*
- » *to provide choice for residents and businesses by providing a variety of growth opportunities, housing types, services, recreation and cultural activities, and public open space;*

**The proposed prestige industrial development supports the County of Wellington in achieving growth priorities and objectives and ensuring projected employment growth is supported by the development of new industrial and retail businesses.**

## Part 4: General County Policies

Per Policy 4.2.1 of the Plan, the County of Wellington will ensure there is sufficient land available to accommodate an appropriate range and mix of employment opportunities (including industrial, commercial and institutional uses). Further, the County will support decisions that ensure an adequate supply of employment lands are available, including by maintaining a range of suitable sites of various sizes for employment uses. Per the Plan:

*The County will protect employment areas along major goods movement facilities and corridors for uses that require those locations and focus freight-intensive land uses to areas in proximity to major highways, airports, and rail facilities.*

Per Policy 4.2.3 of the Plan, the County will, “encourage a variety of employment opportunities in a variety of locations. Opportunities for industrial, commercial and recreation activities will be supported in appropriate locations.”

Although most opportunities will occur in primary urban centres, other locations (including the Rural System, within which the site is located) will be considered for employment uses where there are special advantages, such as larger sites and proximity to resources or major transportation facilities (Policy 4.2.3).

New commercial, industrial and recreation uses are expected to locate in settlements, however, the Rural System will also provide employment opportunities (Policy 4.2.5). In particular, the Rural System can contribute sites for employment uses based on the ability to provide larger lots, access to major roads, and other considerations (Policy 4.2.5).

Per Schedule B7 Land Use (Puslinch) of the County of Wellington Official Plan, the site is designated

*Secondary Agricultural* (Figure 12) and thereby forms part of the Rural System. In these areas, agriculture will continue to be the dominant use, but other uses are permitted, as discussed in Section 6.5 of the Plan (Policy 4.3.2).

Of note, per Section 4.7 Urban Area Protection of the Plan, Policy 4.7.1 states:

*In order to allow the efficient expansion of urban areas, and to maintain a clear distinction between urban and rural areas, the County of Wellington:*

- a) *prohibits new development adjacent to existing primary and secondary urban centres, hamlets or cities unless part of an urban expansion (adjacent will normally mean within 1 kilometre of an urban area boundary);*
- b) *requires that livestock operations adjacent to existing urban boundaries shall only be permitted in accordance with the Minimum Distance Separation Formulae.*

*This policy does not apply to prevent the completion of previously approved development, logical infilling or development of a minor nature which does not impede the efficient expansion of the urban area. Additionally, the expansion of existing developments may be considered if the overall intent of this section is met.*

**The site is not adjacent to existing primary and secondary urban centres, hamlets, or cities within the Township of Puslinch, but does abut the Hespeler Village neighbourhood of the City of Cambridge, Puslinch Golf Club, and Highway 401. The site represents a logical infill opportunity due to the nature of the surrounding land uses, development context, and proximity to Highway 401, and will not impede the efficient expansion of Puslinch’s urban areas.**

**With its ample green space and naturalized areas used for recreational purposes, the Puslinch Golf Club acts as a natural transition area between the fully developed Hespeler Village neighbourhood of Cambridge in the west and more rural lands of Puslinch to the east. To the south of the site, Highway 401 serves as a strong boundary between areas. As Townline Road represents the municipal boundary of Cambridge and Hespeler Village is a fully built-out and stable neighbourhood, its urban area is not expected to expand nor be impeded by the proposed development.**

**The proposed development represents a logical infill opportunity where a transitional urban-rural density can be achieved that fits within the site’s context. As Site Plan A and B demonstrate, the proposed Rural Employment Area development is not “urban” like Hespeler Village neighbourhood nor as “rural” as the Puslinch Golf Club; rather, it serves to provide an appropriate transition between these locations.**

## Part 6: The Rural System

Within the County of Wellington Official Plan, the Rural System includes land designated *Secondary Agricultural Areas*. While farming is the primary activity in these areas, other uses, including residential and employment uses, are permitted so long as they do not adversely impact existing agricultural operations and keep with the rural character of the area (Section 6.3).

Section 6.5 of the Plan provides the policies for *Secondary Agricultural Areas*. Per Policy 6.5.3, permitted uses and activities in *Secondary Agricultural Areas* include:

- a) *all uses allowed in the Prime Agricultural Area;*
- b) *small scale commercial, industrial and institutional uses;*

- c) *public service facilities.*

Further, all types, sizes, and intensities of agricultural uses and normal farm practices are to be promoted and protected. As provided by Policy 6.5.5, small scale commercial, industrial, and institutional uses may be permitted if, amongst other elements:

- b) *the proposed use is compatible with surrounding uses;*
- c) *the use requires a non-urban location due to: market requirements; land requirements; compatibility issues.*
- d) *the use will not hinder or preclude the potential for agriculture or mineral aggregate operations;*
- e) *the use will be small scale and take place on one lot and large scale proposals or proposals involving more than one lot will require an official plan amendment.*

Per 6.5.5(e), large scale proposals for commercial, industrial, and institutional uses require an Official Plan Amendment. The provincial minimum distance formula is to be applied to new land uses (Policy 6.5.7).

**The OPA and ZBA application seeks to permit the development of a prestige industrial centre, comprised of a large format retail building, gas bar, and six industrial buildings that total 94,358 m<sup>2</sup> in area (Site Plan A). The alternative development scenario proposes two additional industrial buildings in place of the retail store and gas bar and provides a total building area of 118,288 m<sup>2</sup> (Site Plan B).**

**As the proposed uses are not wholly supported by the *Secondary Agricultural* land designation in part due to their scale, and the lands are proposed to serve a special function that does not fit into a traditional land use designation at this**

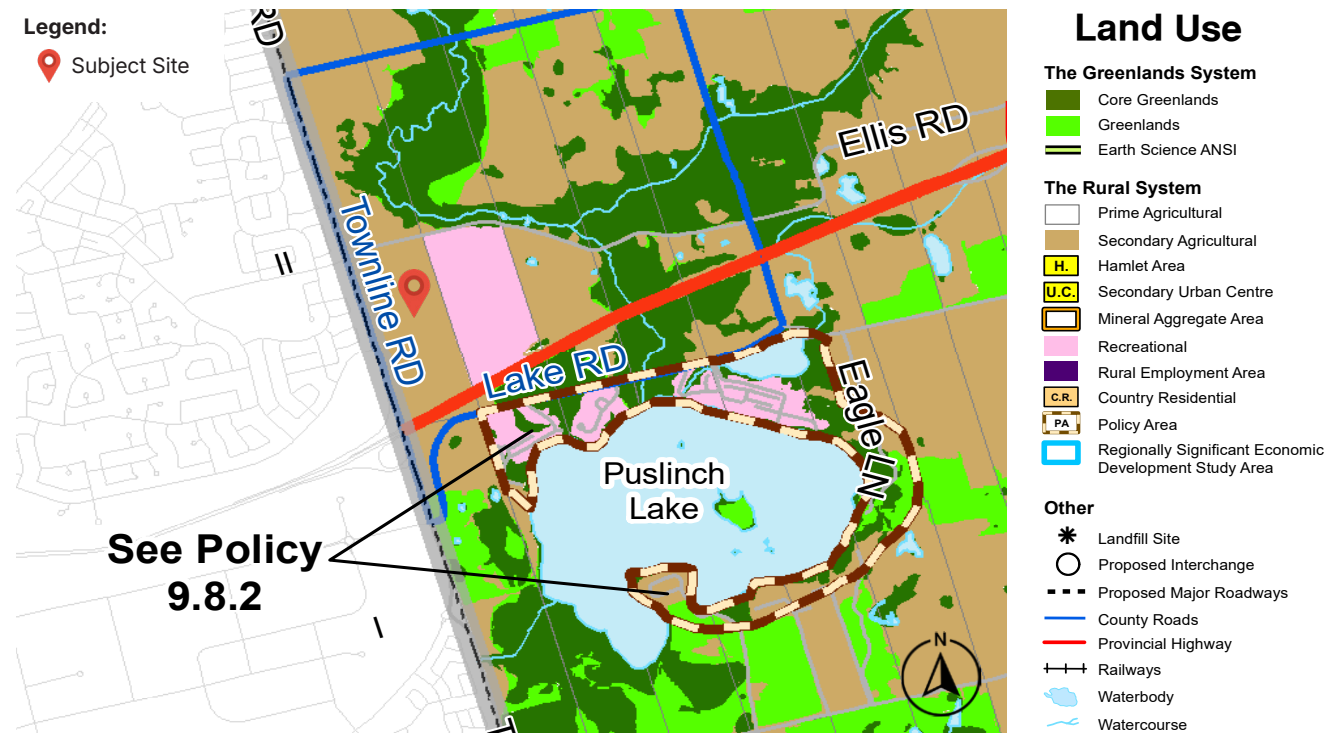


FIGURE 13. Schedule B7 Land Use (Puslinch) of the County of Wellington Official Plan.

time due to their location, servicing requirements, and the special characteristics of the area, a redesignation to *Rural Employment Area* with site-specific exceptions that are provided by the policies of a new *Policy Area (PA7-X)*, is being pursued.

The site's location immediately adjacent to Highway 401 and a cloverleaf interchange, a regional road, and a built-out neighbourhood, in addition to the site's conformity with criteria outlined in the *Puslinch by Design Employment Land Study*, which is discussed further in Section 4.5, provides support for a *Rural Employment Area* redesignation.

*Rural Employment Area* policies are provided in Section 6.8. These areas are lands 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. These areas are to be used for dry industrial and limited commercial uses that do not use significant amounts of water nor produce significant amounts of effluent (Policy 6.8.1).

More specifically, dry industrial uses may include manufacturing, processing, fabrication and assembly of raw materials, or repair, servicing, distribution and storage of materials, and accessory uses, such as the retail sale of products produced on site. Commercial uses are to be service focused with limited accessory retail and can include business or professional offices and automobile sales and services, amongst other uses. Retail and commercial uses typically found in primary and secondary urban centres will not be permitted (Policy 6.8.2). Per Policy 6.8.3, Council will ensure existing and proposed uses are compatible and that sensitive uses are adequately separated from industrial uses.

The proposed development does not include water-intensive industrial operations or the generation of industrial-strength wastewater. The water use and wastewater generated as part of the proposed development are domestic in nature, with more than 80% of the projected flow produced from water closets in the buildings and office employees (see Crozier's Private Servicing Assessment (November 2025)). Water usage is not required for input to industrial assemblies, manufacturing, packaging, fabrication, repair, or storage activities. As such, the proposed uses are consistent with the intent of the Official Plan and definition of "industrial use, dry" provided in the Zoning By-law.

### Part 9: Local Planning Policy

In the County of Wellington, municipalities have developed policies that reflect local differences as certain lands within the municipalities do not fit into the County's traditional land use designations (Section 9.1.1). These areas are referred to as Policy Areas on Official Plan schedules.

Per Policy 9.8.3, the Puslinch Industrial Policy, areas designated *Rural Employment Area* in Puslinch are permitted to have additional uses, including complementary commercial uses such as automotive uses, restaurants, motels, and limited retail, as well as head office and/or research centre uses.

The proposed uses of Site Plan A include a gas bar and a form of retail that is normally found in primary and secondary urban centres. These uses are not permitted within *Rural Employment Areas*; thus, site-specific exceptions are being requested through the designation of a new *Policy Area (PA7-X)*. Moreover, as discussions are ongoing with the City of Cambridge regarding potential servicing arrangements, further site-specific exceptions may be required.

### Summary

The proposed development supports the County of Wellington in achieving objectives related to the provision of jobs, commerce, and services, and ensuring residents have convenient access to commercial uses and services. Further, the proposed plan promotes an efficient land use pattern by clustering several industries on the same lot, which fronts a regional road and Highway 401, thereby expanding access to labour, goods, and services and increasing connectivity within the surrounding region and province.

Per Part 4 of the Plan, the County is to ensure sufficient land is available to accommodate an appropriate range and mix of employment opportunities and protect employment areas along *major goods movement facilities and corridors* for uses that require such locations. Freight-intensive land uses are to be located in proximity to major highways. The proposed prestige industrial development is appropriately located on a larger lot adjacent to a major transportation corridor to efficiently move goods and services. Further, the proposed development represents a logical infill opportunity where a transitional density can be achieved that fits within the site's context.

To support the proposed development, the application seeks to redesignate the lands from *Secondary Agricultural* to *Rural Employment Area* with site-specific exceptions that are provided by the policies of a new *Policy Area (PA7-X)*. Although small scale commercial and industrial uses are permitted on *Secondary Agricultural* lands, larger scale uses require an Official Plan Amendment. Due to the site's location within the County of Wellington's Rural System, scale of the proposal, and the intended dry industrial and limited commercial uses, a redesignation to

**Rural Employment Area within a new Policy Area (PA7-X) is most appropriate.**

**Per the Official Plan, these areas are lands 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 (Policy 6.8.1). Most of the proposed uses are consistent with the intent of permitted uses for Rural Employment Areas in the Official Plan. The development's proposed uses require a large site and access to major transportation routes. 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.**

### 4.3.1 County of Wellington Draft Official Plan Amendment 131

Official Plan Amendment 131 is the County of Wellington's fifth OPA under the Official Plan Review project. The OPA seeks to align rural area policies with the 2024 Provincial Planning Statement and covers five key areas, including Puslinch Rural Employment Growth. A circulation draft of the OPA was prepared on September 11, 2025. As required under Section 26 of the *Planning Act*, a statutory meeting to receive input from the public on OPA 131 was held virtually on February 5, 2026 and in-person on February 12, 2026.

Draft policies of OPA 131 include revising Section 4.2.5 Rural Opportunities policies to specify that the "Rural System will also provide opportunities for employment that are compatible with agriculture and other resource-related uses" (Draft Policy 4.2.5).

Further, draft OPA 131 identifies how a policy of the Plan is to protect the continuity of the *agricultural land base*, which includes *prime and secondary agricultural areas* (Draft Policy 4.3.1). Moreover, the draft policies identify that Class 1, 2, and 3 agricultural lands will be designated as *prime agricultural areas* unless municipal scale studies demonstrate that the land would more appropriately be placed in a *greenlands or secondary agricultural* designation in consultation with the OMAFA, or studies demonstrate that limited non-residential uses are appropriate (Draft Policy 4.3.3).

Of particular note is a proposed amendment to Section 4.7.1 Distinct Urban-Rural Boundary. Per draft OPA 131, Policy 4.7.1(a) is proposed to be deleted in its entirety and replaced with the following:

- a) *prohibits new development adjacent to existing primary and secondary urban centres, hamlets or cities unless part of an urban expansion. Adjacent will normally mean within 1 kilometre of an urban area boundary. In certain circumstances, the existence of natural or human made boundaries can be considered as rationale to support the increase or decrease in the 1 kilometre limit.*

Townline Road, which is classified as a County Road per the County of Wellington Official Plan, may be interpreted as a human made boundary between the City of Cambridge and Township of Puslinch. The section of Townline Road the site fronts onto represents the municipal boundary

between the two municipalities and acts as a strong delineator between the built-up area of Cambridge and more rural development pattern of Puslinch.

Due to this unique locational context, with the site being located within the Township of Puslinch and east of Townline Road, flexibility in terms of the application of Policy 4.7.1(a) would be appropriate in this case.

Further, many new policies for *prime agricultural areas* are proposed as part of OPA 131 to ensure alignment between the policies of the 2024 PPS and County of Wellington Official Plan. The majority of these policies are incorporated into Part 6: The Rural System of the Plan.

Draft OPA 131 also amends Section 9.8.3 of the Plan, which provides Puslinch's Industrial Policy. The draft policies incorporate recommendations from the *Puslinch by Design* study into the policies for lands designated *Rural Employment Area*, whether existing or by future Official Plan Amendment. The draft policies pertain to road infrastructure, land use compatibility, and requirements for transportation plans and concept plans. See Section 4.5 of this report for further information.

Per the presentation provided at the February 12, 2026 public meeting, the redesignation of Secondary Agricultural Area lands to other site-specific uses (beyond those included in draft OPA 131) are not part of OPA 131. Comments from the public expressed support for changes to designate more *Rural Employment Area* land.

Next, the County of Wellington will review all comments received on draft OPA 131 and prepare a final draft OPA which will accompany an recommendation report that will go to County Council.

## 4.4 Township of Puslinch Comprehensive Zoning By-law No. 023-18

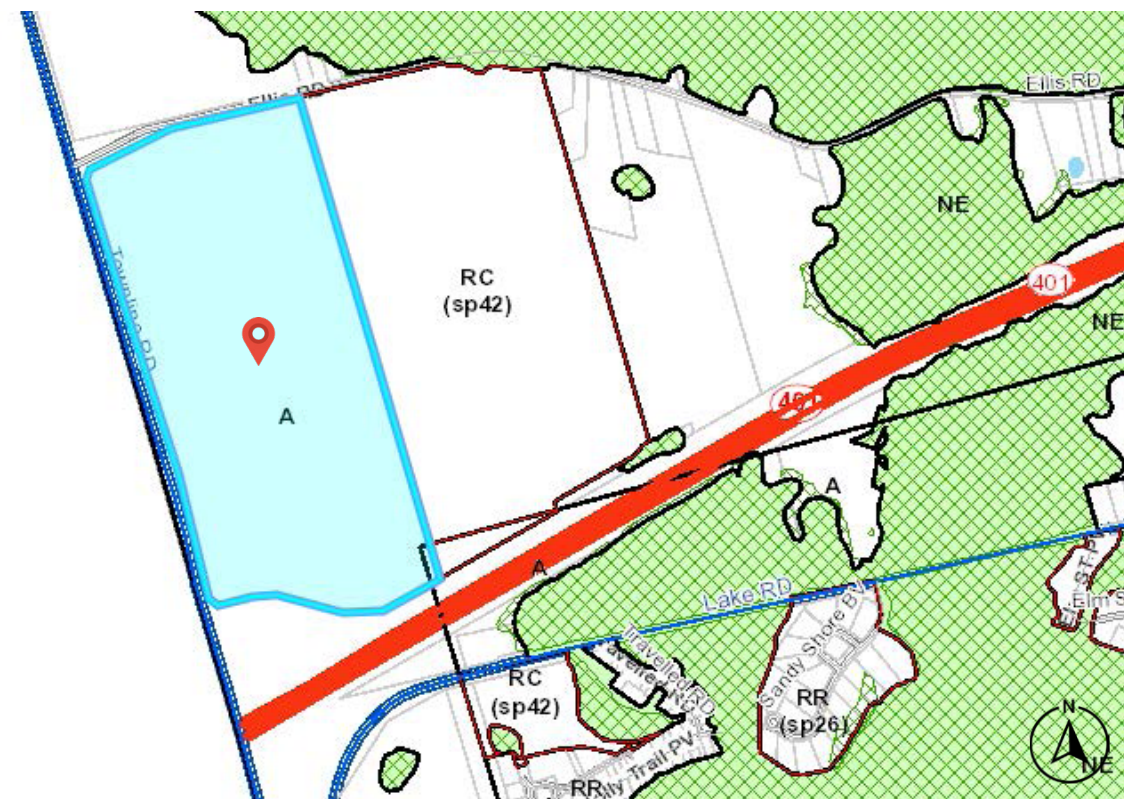
Township of Puslinch Comprehensive Zoning By-law No. 023-18 was adopted by Council in April 2018 and received approval from the Local Planning Appeal Tribunal (LPAT) on January 23, 2020. The purpose of the Zoning By-law is to regulate the use of land, buildings and structures to implement the County of Wellington Official Plan.

The subject site is zoned *Agricultural (A)*. In these zones, permitted uses include agricultural-related uses, bed and breakfast, conservation use, daycare centers, single detached dwellings, group homes, farm-related businesses, farmer markets and farm product sales outlets, home industry, and other uses. The current zoning does not support the proposed lot coverage and uses of the site.

The proposed zone is *Industrial (IND)* with a site-specific special provision to permit the proposed

retail store and gas bar uses on the southern end of the site (IND(spXX)). Per the Zoning By-law, the industrial zone supports industrial, business and professional office, and warehouse uses, a maximum lot coverage of 75%, minimum landscaped open space of 15%, and maximum permitted height of 25 meters. As part of the draft Zoning By-law Amendment application, relief will be sought to permit retail store and gas bar uses on the subject site.

Further, in support of the recommendations of the Land Use Compatibility Study, several uses are proposed to be prohibited on the site, including Class III industrial uses, medical marihuana production facilities, and sawmills.



Legend:  
 Subject Site

FIGURE 14. Zoning of 2809 Townline Road per Township of Puslinch Comprehensive Zoning By-law No. 023-18.

## 4.5 Additional Considerations

### Puslinch by Design Employment Land Study

The *Puslinch by Design Employment Land Study* was completed by consultants through a partnership with the Township of Puslinch and County of Wellington. As part of the County's Official Plan Review work, a need for a minimum of 30 hectares of additional employment lands in the Township of Puslinch was recognized. The purpose of this study was to identify the most suitable lands for future employment growth that will ensure the County meets employment needs into 2051.

For the purposes of the study, employment areas are lands set aside for groups of businesses and economic activities. These areas are industrial in nature and can include manufacturing, warehousing, and supporting uses. The study area boundary was restricted to areas in proximity to the intersection of Highway 6 and Highway 401, which was identified as a key factor that strongly influences the future success of rural employment growth.

In total, eight preliminary land options were identified and assessed for employment growth. One land option was recommended not to be carried given the Ministry of Transportation owned a substantial portion of the lands, thereby severely restricting the developable area.

Each land option was assessed against a series of criteria, including employment land market, transportation infrastructure, private servicing, aggregate impacts, agricultural impacts, natural heritage, design, and cultural heritage. A rating scale was utilized to assess the suitability of each option for a future *Rural Employment Area*. Key considerations and matters of importance to the evaluation of each land option included:

- » Lots that are relatively flat resulting in the need for minimal site preparation.

- » Large contiguous blocks that allow for a range of parcel sizes.
- » Deep lots (approximately 400 meters) that allow for storage at the rear of the property.
- » Visibility to highways to provide an opportunity to attract high profile national tenants.
- » Proximity to highway interchanges to support the movement of goods and services and connections with the greater provincial transportation network.
- » Signalized site access.
- » Contributing to the creation of complete communities.
- » Low to no impacts on traffic levels on rural roads used for moving farming equipment.
- » Avoiding fragmentation of the agricultural land base.

Option D, which is located immediately south of Highway 401 and east of Concession 7 Road, was recommended as the "Preferred Land Option". The site is approximately 93 hectares with a net developable area of approximately 61 hectares. As detailed in the Recommended Land Option and Land Use Report, key strengths of Option D included:

- » A relatively flat topography which is anticipated to minimize site preparation costs
- » Frontage on Highway 401 which enhances visibility and business promotion potential, as well as connectivity to the broader provincial transportation network.
- » A lack of residential, natural heritage, or agricultural setback constraints
- » Mitigatable impacts on environmental features.

Draft OPA 131 incorporates the findings and recommendations of the *Puslinch by Design Employment Land Study*, including the designation of Option D lands as *Rural Employment Area*.

Of note, during a Special Council Meeting on July 23rd, 2025, the Township of Puslinch supported amending draft OPA 131 to also designate lands of Options G and H as *Rural Employment Areas*, and the lands of Options B and C as *Future Rural Employment Areas*.

Council's decision to designate more *Rural Employment Areas* aligns with the original intent of *Puslinch by Design*, which was to identify a minimum of 30 hectares of employment lands in the Township to support projected growth. This decision is particularly strategic as landowners within the newly redesignated areas may not have an interest in developing their land for industrial uses. Ensuring there is sufficient *Rural Employment Area* throughout the Township will support economic development and secure opportunities for future employment growth.

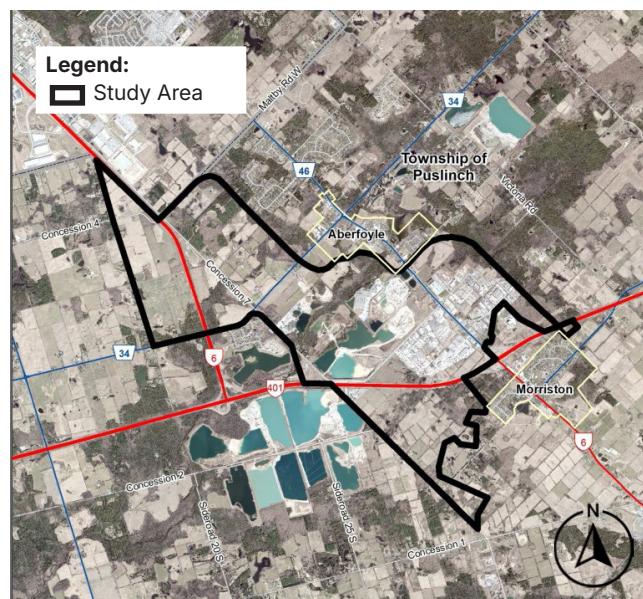


FIGURE 15. Study Area of the Puslinch by Design Employment Land Study.

### Summary

The proposed prestige industrial development illustrated in Site Plan A and Site Plan B includes many elements that establish the site as a strong candidate for redesignation to *Rural Employment Area* per the criteria of the *Puslinch by Design Employment Land Study*. Much like the Preferred Land Option (Option D) of the study, the subject site is located immediately adjacent to Highway 401, has a relatively flat topography, and does not have significant residential, natural heritage, or agricultural setback constraints. As Site Plan A and Site Plan B illustrate, the proposal provides generous building setbacks and landscaped buffers to ensure compatibility with adjacent uses.

In addition to these features, the site aligns with other evaluation criteria utilized in the study, including that it is a deep lot, adjacent to a cloverleaf interchange of Highway 401, and can provide signalized site access, particularly at Jamieson Parkway. Moreover, the site represents a logical infilling opportunity that may avoid fragmentation of the agricultural land base as the site is abutted by the Hespeler Village neighbourhood to the west, Highway 401 and the LG Lovell Industrial Park to the south, and the Puslinch Golf Club to the east.

Overall, based on the criteria provided in the *Puslinch by Design Employment Land Study* regarding the suitability of sites for *Rural Employment Area* land use designations, the subject site is well-positioned to support this type of land use.

## 5.0

# Supporting Studies and Reports

## 5.1 Land Use Compatibility Study

GHD Limited (GHD) was retained to prepare a Land Use Compatibility Study (LUCS) for the subject site. The report was revised in February 2026 to ensure consistency with the Draft ZBA.

GHD recommends that the proposed zoning by-law amendment for the development restrict the uses to Class I and II Industries. Uses permitted within the *Industrial* zone that have the potential to be considered Class III industries, such as industrial uses, medical marijuana production facilities, and sawmills, are likely not feasible on the site without significant mitigation measures and are recommended to be avoided. As such, the Draft ZBA will prohibit Class III industries on site.

Per GHD, it is recommended that further assessment of Class II industries be carried out at the Site Plan Approval stage to evaluate potential dust, odour, noise, and/or vibration impacts and associated mitigation measures necessary to ensure compatibility with existing sensitive uses. Examples of mitigation measures may include, but are not limited to:

**Landscape Buffers:** On-site landscape (or similar) buffers may be used to increase the separation distances between emission sources and sensitive uses. GHD notes that both options for the proposed concept include landscape buffers around the perimeter of the Site.

**Building Orientation:** Orient proposed buildings to shield sensitive uses from the most significant emission sources. For example, loading docks in both options for the proposed concept currently have the worst-case loading docks oriented away from the closest sensitive uses, which is appropriate. Consideration could also be given to relocating or adding vehicle access points for heavy trucks farther from sensitive uses, such as from Side Road 10 or from Townline Road south of Jamieson Parkway.

**At-Source Controls:** Install emissions controls at-source, where possible, for significant discrete emissions sources. Examples of sources for which at-source controls could be used include air contaminant exhausts (stack design for optimum dispersion), air handling or ventilation systems (silencers, low-noise equipment), generators (acoustic enclosure), etc.

**Screening:** Construct earthen berms and/or barriers between emission sources and the residential uses to attenuate noise emissions from employment uses.

**Administrative Controls:** Implement and enforce operating procedures such as anti-idling policies, operator training to minimize noise associated with shipping/receiving, etc.

The specific mitigation measures will be dependent on the final development concept and nature of the end users.

## 5.2 MDS I Setback Calculation

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC) was retained to provide a Minimum Distance Separation (MDS) Report. Since this proposal involves the redesignation and rezoning of land for industrial purposes, the *PPS 2024* requires a Minimum Distance Separation (MDS) Type A analysis.

To identify potential constraints, a 750-metre distance area was investigated using satellite imagery and a site visit conducted on November 4, 2025. One livestock operation was identified

within this area. The property was assessed in accordance with the Ontario Ministry of Agriculture, Food and Agribusiness's (OMAFRA) MDS Guidelines 2, 3, 6, 10, 20, and 33, with specific consideration given to land area, facility type, livestock capacity, calculated MDS setbacks, and actual distances to the subject site.

The existing livestock operation located at 3367 Townline Road, Puslinch consists of a beef cattle barn, which includes an associated paddock and pasture area. Based on signed "Farm Data Sheet" information and desktop analysis using OMAFA's online AgriSuite tools, the MDS setback for the beef cattle barn has been calculated to be 101 metres. This setback allows future development to be planned outside the influence zone, ensuring compliance with MDS requirements.

The MDS I analysis demonstrates that the proposed rezoning is compatible with surrounding agricultural uses and can meet the intent of provincial and municipal planning policies. The existing livestock operation within 750 metres have been appropriately reviewed, and their setbacks evaluated in accordance with the MDS Guidelines.

## 5.3 Natural Heritage Assessment

GeoProcess Research Associates (GeoProcess) was retained to complete a Natural Heritage Assessment (NHA) for the subject site. The report was prepared in October 2025 and revised in February 2026. It examines the potential of the site to support maternity bat roosting habitat and reviews the potential of the proposed development to impact the Puslinch Lake-Irish Creek Wetland Complex north of the site.

Based on field observations, the structures on-site do not show evidence of long-term, recent, or active bat usage. Four potential snags, which could provide maternity roosting habitat functions, were identified. Due to the low numbers of snags identified on the Subject Property, it is concluded that the site provides an overall low maternity roosting habitat function. Although no bats were observed, mitigation measures should be taken given the potential for bats to use these trees. For example, any tree removals should be completed outside of the combined bat maternity roosting season and bird nesting season (April 1 – November 30).

Based on a desktop screening and anthropogenic features observed during field work, snapping turtles and species at risk bats were identified as potentially occurring on site. The presence of barn swallows was confirmed. Demolition or alteration of the barn to accommodate development is to take place outside the breeding period of May 1 to August 31.

A review of the potential for the proposed development to have an impact on the Puslinch-Irish Creek Wetland Complex found that there was a low likelihood that the development would physically modify the wetland, and that it was unlikely to result in a negative impact on the hydrologic or hydrogeologic conditions of the wetland complex.

From a natural heritage perspective, this NHA addresses natural heritage concerns raised by the Township of Puslinch. With the implementation of mitigation measures described above, the development can proceed without negative impacts to bat maternity roost habitat or Puslinch Lake-Irish Creek Wetland Complex.

## 5.4 Tree Inventory / Tree Protection Plan and Arborist Report

Jackson Arboriculture Inc. was retained to complete a Tree Inventory and Preservation Plan report for the subject site. The original report was completed in November 2025 and revised in February 2026. Prior to conducting a site visit, the topographic survey and current aerial photography were overlaid utilizing geographic information software for use on site during the completion of the tree inventory. The tree locations and the site plan were then overlaid and a tree preservation analysis was completed to determine the impacts to the trees included in the inventory. Site visits were conducted on the 29th and 30th of September 2025 to complete the tree inventory. All trees 10 cm in diameter and larger situated on subject property, on neighbouring property within 6 m and within the road allowance were included in the inventory.

The tree inventory documented a total of 223 trees. No rare, threatened or endangered tree species were documented. The results of the impact assessment indicate that the removal of 19 trees will be required to accommodate the proposed development. Trees 44, 45 and 47 appear to reside within the Townline Road allowance. Permission from the appropriate Township department is required prior to removal.

The preservation of 204 trees will be possible with the use of appropriate tree protection measures. Tree protection measures must be implemented prior to the commencement of construction (pre-grading). Encroachment within the mTPZ of Tree 167 will be required to accommodate the proposed development. A Certified Arborist must supervise any work occurring within the mTPZ of Tree 167 to ensure that the root systems are not damaged during construction. Where grading is proposed within the mTPZ, it must be field fit around the mTPZs and tree protection fence to ensure that tree roots are not damaged during construction. A detailed tree inventory is available within the report, under separate cover.

## 5.5 Traffic Impact Study

GHD Limited was retained to complete a Traffic Impact Study. The report was updated in February 2026 to reflect the agreed terms of reference. Accesses to the site are proposed via two full-moves driveways. "Site Access 1" is the north most access from Townline Road and "Site Access 2" is located at Jamieson Parkway. In total, Site Plan A is expected to generate 739 two-way site trips during the AM peak hour, and 1,052 and 1,365 new two-way site trips during the PM peak hour and Saturday peak hour, respectively. Site Plan B is expected to generate fewer trips with 586 two-way site trips during the AM peak hour, and 598 and 247 new two-way site trips during the PM peak hour and Saturday peak hour, respectively.

Both Site Plan A and Site Plan B satisfy parking and loading space requirements as provided in the Zoning By-law. Under existing conditions, all intersections operate at acceptable v/c ratios and levels of service during the peak hours except for the Highway 401 eastbound off-ramp. With the addition of corridor growth, site traffic and intersection improvements, under the 2028, 2033, and 2038 future total scenarios, all intersections operate at acceptable v/c ratios delays and queues with exceptions, as discussed further in the study. Overall, the study concluded that the development may be accommodated by improvements to intersections and the network. Recommended improvements include but are not limited to:

- » **Site Access 1:** Optimized signal timings, signalization of the intersection, provision of an exclusive westbound right-lane and left-lane, and the addition of a northbound through/right-lane and an exclusive southbound left-lane
- » **Site Access 2:** Optimized signal timings, protected phases, conversion of the eastbound right lane to a through-right, and the provision of left-turn lanes on the westbound approach and a left-turn lane on the southbound approach.
- » **Highway 401 Eastbound Off-Ramp:** Addition of an eastbound shared left/right turn lane.
- » **Townline Road and Ellis Road:** Addition of a northbound and southbound through lane.

## 5.6 Site Grading and Servicing Plan

Husson Engineering and Management was retained to develop Site Grading and Servicing Plans for the subject site.

The site will be generally flat, with a total range in elevation of 11 metres. The highest point on the site is towards the southwest at approximately 316 metres above mean sea level, while the lowest is to the northeast, at 304 metres above mean sea level. The site is flattest towards the northern edge of the site, beneath the industrial buildings. The lowest portion of the site (northeast) is where the stormwater management cistern is located.

Relating to Water Distribution, the servicing plan indicates a proposed watermain will loop around the centre of the site and connect to the existing municipal watermain along Townline Road. Should municipal water servicing not be attained through the existing watermain, the site can be serviced by private water supply, as outlined in the Crozier Private Servicing Assessment.

With regard to sanitary services, the proposed industrial buildings will connect to a proposed septic bed and advanced treatment block along the west side of the site, adjacent to Townline Road. The retail store and gas bar will have sanitary sewers that connect and flow out of the site perpendicular to Townline Road, extending to connect to the existing sanitary on Jamieson Parkway.

Relating to storm sewers, for both Site Plan A and Site Plan B, various entry points throughout the site are proposed and will connect to a stormwater management cistern in the northeastern portion of the site, which will further connect to an oil and grit separator unit that will be detailed further during the detailed design stage.

## 5.7 Functional Servicing and Stormwater Management Report

Husson Engineering and Management was retained to complete a Functional Servicing and Stormwater Management Report for the subject site. The report found that the proposed development meets the Township of Puslinch and the Grand River Conservation Authority's requirements. It was determined that peak flows for storms up to and including the 100-year event will be controlled on site to meet the required targets, and that water quality controls will be designed to provide 80 percent overall TSS removal, as required.

For Site Plan A, sanitary drainage for the northern portion of the site will be conveyed to the proposed treatment system per Township requirements. For Site Plan B, the entire site will be conveyed to the proposed treatment system per Township requirements. For Site Plan A, the existing watermain on Townline Road can be used to service the proposed development. A hydrant flow test will be completed to confirm the available pressures with the SPA work. If the municipal servicing option is not found to be acceptable, it is feasible to provide private water well supply servicing for the site, as outlined in the Crozier Servicing Memo.

For Site Plan A, the existing sanitary sewer on Jamieson Parkway can be used to provide service for the southern retail portion of the site. External works will be required to extend the service to Townline, adjacent to the site. The detailed design will be completed as part of the Site Plan application stage of the project. In the case where municipal services are not provided for the site, private sewage can be provided on the site as outlined in the Crozier servicing memo. This will be further detailed as part of the Site Plan work. Water balance will be investigated by the hydrogeologic engineer and included with the SPA work. The water balance target for the site will be met through underground infiltration chambers, based on the soils and the recommendations provided in the Investigation.

Ultimately, the report found that the stormwater management and site servicing requirements for this application have been met.

## 5.8 Geotechnical Investigation Report

Soil Engineers Ltd (SEL) was retained to conduct a Geotechnical investigation for the subject site. The purpose of the investigation was to reveal the subsurface conditions and to determine the engineering properties of the disclosed soils for the design and construction of the proposed development. The field work, consisting of 10 sampled boreholes extending to a depth of 6.6 m from the prevailing ground surface, was carried out on July 21 and July 22, 2025. The geotechnical findings which warrant special consideration are presented below:

After demolition of the existing structures and foundations, the debris must be removed and disposed off-site. The topsoil must be removed for site development. It can only be re-used for landscaping in designated areas.

The native soils are weathered extending to depths ranging from 0.6 to 1.2 m from the prevailing ground surface. It is weak and will consolidate under surcharge loads. To upgrade the weathered soils to engineered status suitable for normal footing construction, they must be sub-excavated, sorted, aerated and properly compacted.

The engineered fill and sound native soils are suitable for supporting the proposed structures on conventional footings and for construction of underground services and road pavement. The proposed structures can be supported on conventional spread and strip footing founded on the native soils or engineered fill below the frost penetration depth. The foundation subgrade must be inspected by the geotechnical engineer or a senior geotechnical technician to ensure that the revealed conditions are compatible with the foundation design requirements.

Due to the presence of weathered soils, and depending on site grading, saturated sand and silt, the footing subgrade must be inspected by a geotechnical engineer, or a geotechnical technician under the supervision of a geotechnical engineer, or a building inspector who has geotechnical experience, to assess its suitability for bearing the designed foundations.

Additional borehole investigation and review will be carried out for the future buildings once the detailed design for the proposed development becomes available.

## 5.9 Hydrogeological Assessment

Soil Engineers Ltd. (SEL) was retained to conduct a hydrogeological assessment for proposed development on the subject site. The investigation revealed the following.

The subsoil investigation has revealed that beneath the topsoil, the investigated area of the Subject Site is mainly underlain by sandy silt till/silty sand till, silt and sand, within the area of the boreholes drilled by SEL within the Subject Site. The investigation extended up to a maximum termination depth of investigation of 6.6 metres below ground surface (mbgs).

The finding of the groundwater monitoring indicates that all the BH/MWs were dry with the exception of BH/MW 6 with the groundwater level measured ranging between El. 303.3 metres above sea level (masl) and 303.1 masl during the monitoring program.

Groundwater seepage is not expected for construction of the proposed slab-on-grade industrial buildings. Since the range of the anticipated preliminary short-term construction dewatering flow (which is only expected during a storm event) remains below the MECP EASR threshold limit, an EASR filing with MECP will not be required. However, obtaining permits from the County of Wellington will be required if the collected water during the storm event is proposed to be directed to the region or city's sewer system. Alternatively, the collected water can be removed from the site by a licensed contractor.

The proposed development will be constructed above shallow groundwater table. As such, no short-term construction dewatering from the groundwater source is expected, and no significant impacts to the natural features are anticipated.

A review of the MECP well records confirmed that there are 50 records for a water supply that are registered within 500 m of the Subject Site. As no short-term construction dewatering from the groundwater source is expected, no significant impacts to the potential groundwater users are anticipated if the well exists and are in service. Record review indicates that there is one water supply well within the Subject Site. The water supply well should be decommissioned in advance of construction if it is not required for the post-development site. If the water supply well is considered for the post-development site, it should be monitored during construction.

In a letter titled, "Response to Comments; Proposed Commercial/Industrial Development; 2809 Townline Road' Town of Puslinch", dated February 9, 2026, SEL responded to comments provided by the Township of Puslinch's assigned peer reviewer, Wellington Hydrogeology.

SEL indicated that additional groundwater quality sampling and level monitoring would be conducted during the Spring 2026 season to confirm the groundwater level within existing monitoring wells during the seasonal high shallow groundwater table. If shallow groundwater is not contacted during the monitoring program, the installation of additional monitoring wells at deeper elevations is recommended.

## 5.10 Conceptual Urban Design Brief

Ware Malcomb was retained to prepare a conceptual urban design brief in support of the proposed development on the subject site. The brief was revised in January 2026.

The design principles and layout follow the Township of Puslinch's Design Guidelines to ensure compatibility with adjacent rural and employment lands and are rooted in the Township's commitment to thoughtful, context-sensitive growth. The principles include Compatibility, Connectivity, Sustainability, and Flexibility.

While this proposal offers two development schemes, the overall urban design approach is similar, ensuring both schemes are consistent with the Township of Puslinch's design principles and positively contribute to the regional employment and commercial landscape.

The built form and massing of both schemes include clear heights ranging from 8 to 12 metres. Massing is broken into smaller volumes to reduce visual impact, and high-quality materials will be used on both. The materials and architectural elements will create a contemporary aesthetic that is durable and functional. The industrial condominiums will be designed with a storefront style façade to support the viability of small businesses and customer access. These units will feature prominent glazing and protective canopies to create a pedestrian-friendly environment.

The streetscape and public realm of both schemes are designed to create a welcoming, functional, and visually cohesive environment that enhances user experience. All entry points will be defined by coordinated signage, landscaped gateways,

and decorative paving that create a clear sense of orientation.

Pedestrian pathways, framed by planting beds and seating areas, will be integrated throughout the site, connecting building entrances, parking areas, and shared amenities. Public realm enhancements will include outdoor gathering spaces, such as small plazas or seating nodes, particularly near the industrial condominiums and retail anchor. These areas will be shaded with tree planting and canopies, and furnished with benches, waste receptacles, and bicycle racks to encourage active transportation and informal interaction.

Overall, the project demonstrates a strong alignment with applicable planning policies and design guidelines, and it represents a strategic opportunity to transform underutilized land into a vibrant employment hub that contributes to the economic vitality of the region. The development supports employment growth and contributes to regional economic development.

As discussed in greater detail within the brief, the proposed development conforms with the following Puslinch Design Guidelines:

- » B1 - Commercial, Industrial and Institutional Uses
- » B2 - Corner Sites and Gateways
- » B3 - Pedestrians and Cyclists
- » B4 - Vehicles, Parking, and Service Areas
- » B5 - Signs
- » C4 - Development Near Residential Uses
- » C5 - Site Landscaping

## 5.11 Preliminary Noise Study

Thornton Tomasetti was retained to conduct a Preliminary Noise Study for the proposed development. The report, dated February 3, 2026, considered on-site truck traffic and generic mechanical equipment, as well as the potential for cold storage and the use of reefer units.

Noise impacts, excluding potential reefer trucks, are expected to meet applicable NPC-300 guideline limits on all surrounding noise sensitive receptors, with acoustic barriers for the proposed concepts. Reefer noise could be mitigated through the use of acoustic barriers and/or operational restrictions.

For Site Plan A, acoustic barriers are recommended for Buildings 1, 2 and 3. For Buildings 1 and 2, a wing wall acoustic barrier along the north edge of the loading bays, approximately 6.25 m in height and 19.5 m in length, is recommended, with a laneway barrier breaking the line -of-sight between the wing wall barriers. For Building 3, a similar wing wall acoustic barrier is recommended, with a slightly lower height (5.0 m) and an L-shaped barrier along the edge of the north-east laneway. Rubber isolation pads are assumed to be included on each load leveling plate for the buildings.

For Site Plan B, the same mitigation measures are recommended, with reductions in the heights of the wing walls and laneway barriers. The load leveling plates for Buildings 1, 2, 3, 7 and 8 are assumed to each have rubber isolation pads.

Should buildings include cold storage, building supplied cooling is necessary to allow reefers to shut-down while in the loading dock. Through the inclusion of additional cooling equipment and a combination of equipment selection, placement and/or acoustic barriers, NPC-300 guidelines limits may be met. Overall, the proposed development is considered feasible for noise with the inclusion of the noise control measures identified in the report.

## 5.12 Agricultural Impact Study

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC) was retained to conduct an Agricultural Impact Assessment for the subject site. The report, dated February 5, 2026, considered the potential for reductions in agricultural lands and infrastructure, the fragmentation of agricultural lands, compatibility impacts, economic and community impacts, traffic impacts, and natural environment impacts resulting from the proposed development.

Overall, the development is not anticipated to have a negative impact on the long-term viability of agriculture within the County of Wellington and Township of Puslinch as the development is proposed on lands that are not designated as a prime agricultural area or specialty crop area; the surrounding agricultural area is already fragmented by nature of proximity to the existing City of Cambridge settlement area, non-agricultural uses, and rural residential uses; and, the proposed development complies with the minimum distance separation formulae.

Further, the lands exhibit characteristics of lower priority agricultural lands and impacts to surrounding agricultural operations can be mitigated in several ways, including:

- » Providing agricultural education to all construction personnel;
- » The use of edge planning techniques to protect surrounding farm operations;
- » The use of non-invasive plant species in landscaping and best management practices for the use of salt; and,
- » The use of any topsoil and subsoil that was stripped during construction in final landscaping, edge buffering, and green infrastructure.

## 6.0

# Planning Analysis

Based on the policy analysis undertaken, it is our opinion that the proposal is consistent with provincial, regional, and municipal planning policy frameworks as they pertain to encouraging economic development in strategic areas. In particular, the site is suitable for future *Rural Employment Area* lands based on the criteria outlined in the *Puslinch by Design Employment Land Study*.

A site-specific exception to the *Rural Employment Area* designation is required to support the proposed development. As such, a new *Policy Area* designation is proposed as part of this application. The following sub-sections highlight the key merits of the proposal and outline how the proposed development represents good planning.

## 6.1 Increasing Employment Opportunities in Appropriate Locations in Wellington

The proposed prestige industrial development is consistent with the themes of the *Planning Act*, *PPS*, and County of Wellington Official Plan that promote employment growth in appropriate locations and the efficient use of land and existing infrastructure, including major transportation networks. In particular, due to the site's location at the cloverleaf interchange of Townline Road, a regional road, and Highway 401 (a provincial highway), and proximity to a suburban neighbourhood, the site is an ideal candidate for future employment uses due to regional access to labour, goods, and services.

The proposed development will serve as a "Gateway to Puslinch" and support the County of Wellington in meeting employment growth projections. The site represents a logical infilling opportunity as it is abutted by the Hespeler Village neighbourhood to the west, Highway 401 and the LG Lovell Industrial Park to the south, and the Puslinch Golf Club to the east. Further, per the criteria provided in *Puslinch by Design*, the site

is a strong candidate for redesignation to *Rural Employment Area*. Amongst other elements, the site is relatively flat, resulting in the need for minimal site preparation, and the large size of the site supports the provision of generous building setbacks and landscaped buffers to ensure compatibility with adjacent land uses.

As the lands are proposed to serve a special function due to their proposed uses, location, servicing requirements, and the unique characteristics of the area, as described within this report, a site-specific OPA is required. These exception policies will apply to the *Rural Employment Area* designation and will include a new *Policy Area* overlay to allow for additional permissions, including retail and gas bar uses. Additionally, adequate servicing will be provided to ensure water and wastewater infrastructure is in place prior to year-round occupation and operation of the site.

## 6.2 Economically Viable Development

In accordance with the policies of the *PPS*, the proposal diversifies the economic base to meet long-term needs and is a strategic site for investment and employment uses that can support a wide range of economic activities and ancillary uses. Further, the development supports the County of Wellington and Township of Puslinch in achieving objectives related to the provision of jobs, commerce, and services.

The site is particularly appealing to prospective tenants due to its frontage along Highway 401, location adjacent to an interchange, and regional road, immediate access to a labour pool, public transit access, and surrounding urban context. Nestled between the Hespeler Village neighbourhood and Puslinch Golf Club, with the LG

Lovell Industrial Park only a few hundred meters to the south, the site is well supported by surrounding amenities and offers convenient access to industrial uses and complementary commercial services.

Further, the site has been formally regarded by CBRE as, "very appealing for industrial development and checks a lot of boxes of what companies and prospective tenants are looking for" (see Appendix D, paragraph 1). Per CBRE's letter of support for the development, the proposal's appealing Highway 401 frontage, easy access to a major Highway 401 interchange, and access to an immediate labour pool, public transit, and nearby amenities, including a gas station, banks, and restaurants, make it "attractive for various users in the market".

## 6.3 Compatible Built Form and High-Quality Design

The proposed prestige industrial development, as presented in Site Plan A and Site Plan B, represents a compatible built form and high-quality urban design. The site's layout employs the Township of Puslinch's Design Guidelines, as discussed in Section 5.10, to ensure compatibility with surrounding land uses, context-sensitive growth, and a pedestrian-friendly environment.

The proposed development will transform 2809 Townline Road into a vibrant employment hub that positively contributes to the surrounding landscape through the incorporation of engaging and thoughtful design elements such as active frontages, generous landscaped areas, public realm enhancements, and pedestrian-oriented scale and massing. Further, the proposed prestige industrial proposal supports active transportation usage through the provision of bicycle parking facilities.

## 7.0

# Conclusion

Based on the information outlined in this Planning Justification Report and the findings identified in the supporting technical reports and studies, we are of the opinion that the proposed prestige industrial development and implementing Official Plan and Zoning By-law Amendments represent an appropriate development of the subject site. The proposal represents good planning, as it supports the creation of new employment opportunities at a site that benefits from access to existing major transportation infrastructure and proximity to existing commercial and residential lands within the City of Cambridge.

We conclude the following:

- » The proposed development and associated OPA and ZBA are consistent with the *Provincial Planning Statement, 2024*;
- » The proposed development and associated OPA and ZBA conform to the overarching vision, objectives, and policy directions of the County of Wellington Official Plan;
- » The proposed redesignation from *Secondary Agriculture* to *Rural Employment Area* within a new *Policy Area (PA7-X)* that make efficient use of underutilized lands along a regional road and adjacent to a major transportation corridor.
- » The proposed development will support increased employment opportunities and the provision of commerce, goods, and services in the County;
- » The proposed development can be appropriately serviced. While municipal servicing of the site is actively being pursued, private water and sewage servicing can be provided; and,
- » The proposed development will not result in significant adverse impacts on the surrounding area.

It is our professional land use planning opinion that the proposed development is appropriate, desirable and achieves good planning.

Respectfully submitted,



Michi McCloskey  
MCIP RPP M.IDS BURPI  
Senior Associate  
Sajecki Planning Inc.

**Appendix A:**

# **Pre-Consultation Meeting Comment Summary**



PRE-CONSULTATION MEETING AGENDA  
VIRTUAL MEETING BY ELECTRONIC PARTICIPATION &  
IN-PERSON AT THE PUSLINCH FIRE AND RESCUE TRAINING HALL –  
7404 WELLINGTON RD 34, PUSLINCH  
AUGUST 21, 2025  
9:00 A.M.

Join Zoom Meeting

<https://us02web.zoom.us/j/83052227011?pwd=VIY7WNUUpTm49oSrzkny4ip1hvOr5Cb.1>

Dial by your location

- +1 778 907 2071 Canada
- +1 438 809 7799 Canada
- +1 587 328 1099 Canada
- +1 613 209 3054 Canada
- +1 647 374 4685 Canada
- +1 647 558 0588 Canada

Meeting ID: 830 5222 7011

Passcode: 976506

Find your local number: <https://us02web.zoom.us/u/kbYFHct9aH>

## **AGENDA**

### **1. Call the meeting to order**

### **2. Applications**

2.1. 9:00 AM – Proposed Zoning Amendment Application – 7248 Gore Rd.

2.2 10:00 - Proposed Zoning Amendment Application – 2781-2809 Townline Rd

#### **Applicant/Agent in attendance:**

Peter Mahovlich, Fieldgate Properties – Agent

Todd Cullen – Property Owner

Ed Sajecki, Sajecki Planning Inc.

Josh Marlowe

Jordan Dyer

#### **Township staff and consultants in attendance:**

Lynne Banks, Development & Legislative Coordinator

Jesse Auspitz/Jeremy Tran – Township Planning Consultants



PRE-CONSULTATION MEETING AGENDA  
VIRTUAL MEETING BY ELECTRONIC PARTICIPATION &  
IN-PERSON AT THE PUSLINCH FIRE AND RESCUE TRAINING HALL –  
7404 WELLINGTON RD 34, PUSLINCH  
AUGUST 21, 2025  
9:00 A.M.

Mehul Safiwala – Junior Planner

Jacob Normore – By-law Enforcement Supervisor

Township Consultant Ecologist - Sydney Gilmour, NSRI

Township Engineers – Andrea Reed/Parth Ladd, GEI Consultants

County of Wellington Planning – to be determined

County of Wellington Transportation – to be determined

Source Water Protection – to be determined

Township Hydrogeologist Consultant – Angie Mason

GRCA – to be determined

**Comment Summary**  
**Attached as Schedule “A”**

2.3 11:00 – None

### **3. Adjournment**

## Comment Summary – 2781-2809 Townline Rd

### Preconsultation

NPG Planning Consultants	See letter attached
GEI – Township Engineers	See letter attached
County Planning	See letter attached
Hydrogeology	See letter attached
Ecology	See letter attached
Township of Puslinch Fire Department	No comments
Township of Puslinch Building Department	No comments received to date
Township of Puslinch Property Standards & By-law Enforcement	No comments
Township of Puslinch Public Works Department	No comments
Sourcewater	See letter attached
County Transportation Department	No comments – Regional Road
GRCA	GRCA has no objection to the proposed pre-consultation submission. The subject property does not contain any GRCA features. The property is not subject to Ontario Regulation 150/06 and, therefore a permission from GRCA is not required. Please see our resource Mapping attached.
MTO	See letter attached



---

June 23, 2025

Lynne Banks  
7404 Wellington Road 34,  
Puslinch, Ontario

Dear Lynne Banks,

RE: **NPG Comments**  
**2781-2809 Townline Road**  
**RE: Preliminary Pre-consultation for Zoning By-law Amendment**

---

NPG Planning Solutions Inc. (NPG) has been retained to provide comments regarding a preliminary pre-consultation for a proposed development consisting of prestige industrial uses, small-mid bay commercial industrial uses, big box commercial/retail uses and future commercial industrial uses.

The Subject Lands, municipally known as 2781-2809 Townline Road, are approximately 33.05 hectares (330,500 square metres) and have approximately 400 meters of frontage along Ellis Road, as identified through the Explore Wellington online mapping system. The Subject Lands are presently used for agricultural purposes and hosts a development showroom near the southwest corner. Surrounding uses consist of agricultural uses to the north, a golf course to the east, a highway, car parking lot and vacant land to the south, and detached residential development in the City of Cambridge to the west.

The Subject Lands are not within the Grand River Conservation Authority's (GRCA) regulation limit, but the property is within 120 metres of a provincially significant wetland to the north.

This is the first submission for a preliminary pre-consultation. As part of this submission, NPG has reviewed the following document:

- Preliminary Conceptual Industrial Site Plan.

### **Provincial and County Policy**

The Subject Lands are located within Rural Lands as per the Provincial Planning Statement 2024 (PPS). Schedule B7-1 of the County of Wellington Official Plan (County Official Plan) designates the Subject Lands Secondary Agricultural. Section 6.5.3 states that small scale commercial,



NPG Planning Solutions  
4999 Victoria Ave | Niagara Falls, ON L2E 4C9  
[npgsolutions.ca](http://npgsolutions.ca)

(905) 321 6743  
✉ [info@npgsolutions.ca](mailto:info@npgsolutions.ca)

industrial and institutional uses are permitted in Secondary Agricultural areas. Furthermore, Section 6.5.5 of the County Official Plan permits small scale commercial, industrial and institutional uses provided that certain criteria are satisfactorily addressed.

Section 5.6.2 of the County Official Plan requires an Environmental Impact Study (EIS) to ensure the requirements of this Plan will be met, and consider enhancement of the natural area where appropriate and reasonable for development is proposed within 120 metres of a provincially significant wetland.

### **Township Zoning By-law**

The Subject Lands are zoned Agricultural (A) under the Township's Comprehensive Zoning By-law No. 023-18 (Township Zoning By-law). Industrial or commercial/retail uses are not permitted on Agricultural (A) zoned lands according to Section 11.2.

### **Proposal**

From the Preliminary Conceptual Site Plan, it appears that the Applicant is proposing to permit a range of commercial and industrial uses that are labelled as commercial industrial, prestige industrial, small-mid bay commercial industrial and big box commercial retail. The Site Plan appears to also propose one building (150,000 square feet) within the big box commercial/retail portion and two buildings (150,000 square feet and 250,000 square feet, respectively) within the Prestige Industrial portion for industrial, manufacturing and/or warehouse uses. It is unclear whether the Applicant is also contemplating lot creation to accommodate these uses. We require the following information to provide an appropriate evaluation of the proposal:

- Confirmation if the internal dashed lines on the Site Plan represent proposed creation of new lots;
- Confirmation if the Applicant intends to propose a new public road through the Subject Lands where the reference of "road allowance" is on the Site Plan; and
- Provision of a list of uses associated with each portion. We note that "prestige industrial", "small-mid bay commercial" and "big box commercial retail uses" are not defined terms in the Township Zoning By-law.

As commercial and industrial uses are generally not permitted in the Agricultural Zone, a Zoning By-law Amendment application is required to facilitate the proposal. The Applicant needs to provide a Planning Justification Report as part of the Zoning By-law Amendment application, demonstrating that the proposal conforms with the relevant policies of the County Official Plan, particularly Section 6.5.5. We note that the proposal may warrant an Official Plan Amendment if it is deemed to not conform with County OP.

Based on our preliminary understanding of the proposal, we have concern with the proposed uses and scale to be located on Rural Lands and outside of the Employment Areas. The Planning Justification Report needs to elaborate how the proposed Zoning By-law Amendment and/or Official Plan Amendment applications are consistent with the PPS.

If lot creation is proposed, a land division application will be required. The creation of a new public road may necessitate a Draft Plan of Subdivision application.

The Subject Lands are within the Township's Site Plan Control Area and the proposal is subject to a Site Plan Approval application.

Once the requested information is provided, we will be able to advise which *Planning Act* applications are required for the proposal.

### **Technical Comments**

1. The Site Plan needs to provide all information required by the Township to determine necessary zoning relief for the proposed development. At a minimum, the following should be included:
  - a. Legal description of the Subject Lands
  - b. A Zoning Matrix, identifying the Township Zoning By-law's applicable regulations, including General Provisions, and what is provided/ proposed by the proposal;
  - c. Statistics related to the proposed floor areas and the number of parking spaces provided associated with each use for each proposed lot(s);
  - d. All proposed buildings and structures and their setbacks;
  - e. Location of proposed vehicular accesses;
  - f. Layout of the parking and service areas and dimensions of the loading spaces, vehicular parking spaces, bicycle parking spaces, and parking aisle width;
  - g. Landscaping provision required by the Township Zoning By-law; and
  - h. Location of proposed private servicing systems.
2. A Land Use Compatibility study is required to demonstrate the proposed uses do not create adverse effects to the adjacent sensitive use, i.e. the nearby residential area, and to recommend mitigation measures to improve land use compatibility between the properties. The Land Use Compatibility Study should address matters not limited to noise, odour and vibration in accordance with Provincial Land Use Compatibility (D-series) Guidelines.
3. The Applicant needs to provide a draft Zoning By-law instrument that outlines the actual site-specific zoning relief being requested.
4. Trees have been identified along the property boundary and at the southeast corner around the existing buildings on the Subject Lands. We may determine that a Tree Protection Plan is required once an updated Site Plan is available with more information.
5. If outdoor lighting is contemplated, Section 4.15 of the Zoning By-law includes provisions

related to lighting that should be considered at detailed design stage. A Photometric Plan will be required at the Site Plan Application stage.

6. The Township's Puslinch Design Guidelines are applicable to commercial, industrial and institutional development and redevelopment proposals throughout the Township. Subject to the scale of the proposal, a Design Brief may be required to discuss how the proposal has considered and addressed relevant guidelines contained in Puslinch Design Guidelines.
7. As the proposal involves permitting non-agricultural uses, i.e. industrial and commercial uses, on lands designated for agricultural uses, Minimum Distance Separation (MDS) I setback calculation is required.
8. An EIS may be required if proposed development is within 120 metres of the provincially significant wetland. Further confirmation from the Grand River Conservation Authority and the Township's Ecologist is needed to determine if the EIS is required.
9. The following information is available to assist with a submission:
  - a. Municipal Development Standards: [https://puslinch.ca/wp-content/uploads/2022/07/117006-3-Puslinch-Standards\\_FINAL-September-2019.pdf](https://puslinch.ca/wp-content/uploads/2022/07/117006-3-Puslinch-Standards_FINAL-September-2019.pdf)
  - b. Puslinch Design Guidelines: <https://puslinch.ca/wp-content/uploads/2022/07/Puslinch-Design-Guidelines-Feb-2010.pdf>
  - c. Site plan Requirements: [https://puslinch.ca/wp-content/uploads/2020/09/Site-Plan-and-Drawing\\_Guidelines.pdf](https://puslinch.ca/wp-content/uploads/2020/09/Site-Plan-and-Drawing_Guidelines.pdf)

### **Required Plans and Studies**

For a Zoning By-law Amendment Application, the following required plans have been tentatively identified:

- Survey Plan;
- Updated Site Plan;
- Property Index Map and Parcel Registers (including all PIN Printouts and Legal Instruments);
- Planning Justification Report;
- Land Use Compatibility Study;
- Design Brief, if needed;
- Draft Zoning By-law Amendment;
- Tree Protection Plan, if needed;
- Photometric Plan, if needed;
- MDS I Setback calculation; and
- Environmental Impact Study, if needed.

Once a more thorough Site Plan has been submitted by the Applicant and more is understood about the proposal, additional studies and plans may be identified.

Sincerely,



---

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

August 18, 2025

GEI Project No. 2501655 – 125006-010

VIA CLOUDPERMIT: Township of Puslinch

Lynne Banks  
Township of Puslinch  
4704 Wellington Road 34  
Puslinch, ON NOB 2J0

**Re: Pre-Consultation Request  
2781-2809 Townline Road  
Puslinch, ON**

Dear Ms. Banks:

Following our review of pre-consultation application documents received on August 13, 2025, we are providing comments related to a proposed development on the subject lands located at 2781-2809 Townline Road in the Township of Puslinch.

It is our understanding that the proposed development includes a retail store, gas station, and six industrial buildings, with associated parking, and five driveway accesses from Townline Road. The lands are currently zoned agricultural and therefore a zoning bylaw amendment would be required prior to site plan application.

The following documents were received and reviewed:

- Conceptual Site Plan, prepared by Ware Malcomb, dated August 5, 2025.
- Topographical Survey, prepared by J.D. Barnes, dated July 15, 2025.
- Legal Survey, prepared by J.D. Barnes, dated July 15, 2025.

From an engineering perspective, we provide the following requirements in support of a future zoning by-law amendment:

- **Geotechnical and Hydrogeological Studies**, providing information as required to support building design, septic system design, availability of potable groundwater, and stormwater management design.
- **Site Plan**, generally showing proposed (post-development) aboveground and underground infrastructure, including but not limited to, buildings, storage areas, parking areas, driveways, curbs, walkways, lighting, signage, fencing, potable water well, septic system, fire routes, fire protection infrastructure, and any stormwater infrastructure.

- **Existing Conditions Plan**, generally showing any existing infrastructure and services, and any removals.
- **Site Grading and Servicing Plan**, generally showing existing and proposed drainage patterns on the subject lands, confirming legal drainage outlet, and showing proposed infrastructure and services, including but not limited to water lines, septic systems, sanitary sewers, storm sewers and stormwater management facilities.
- **Functional Servicing and Stormwater Management Report**, detailing:
  - The existing conditions of the site and the nature of the proposed development.
  - How the site will be serviced by potable water and wastewater servicing.
  - How stormwater management will be provided for the site including stormwater quality, quantity, erosion control and water balance, as required by Township Standards.
  - Grading and drainage considerations, including overland flow route and legal outlet.
  - Geotechnical and hydrogeological considerations.
  - Transportation considerations.
- **MTO Review**, the applicant is to provide Ministry of Transportation comments to the Township as the subject lands are located adjacent to Highway 401.

In addition to the above, at the time of site plan approval, the following will be required:

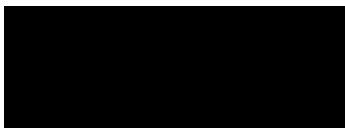
- **Erosion and Sediment Control Plan**, providing provisions for the control of sediment and potential erosion during construction to limit impacts on surrounding areas and infrastructure.
- **Photometric Plan**, demonstrating how the site is to be illuminated in accordance with Township Standards.
- **Landscaping Plan**, designed to illustrate existing and proposed plantings onsite and required restoration works for the property.
- **Spills Management Plan**, to document the control of potential spills on the property.
- **Itemized Construction Cost Estimate**, which includes 15% for engineering and contingencies.

Please note that all engineering drawings and reports shall be stamped by a qualified Professional Engineer.

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

Sincerely,

GEI Consultants Canada Ltd.



Andrea Reed, P.Eng.  
Project Engineer



## COUNTY OF WELLINGTON

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PLANNING AND DEVELOPMENT DEPARTMENT  
Aldo L. Salis, BES, M.Sc. MCIP, RPP Director of Planning and Development  
TEL: (519) 837-2600 ext. 2064  
EMAIL: zacharyp@wellington.ca

ADMINISTRATION CENTRE  
74 WOOLWICH STREET  
GUELPH, ONTARIO  
N1H 3T9

August 18<sup>th</sup>, 2025

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

Dear Ms. Lynne Banks:

**Re: Pre-consultation Request – 2781-2809 Townline Road  
Industrial Development and Major Retail Store**

---

Thank you for circulating the request for pre-consultation comments for the above-noted property. It is understood that a pre-consultation was previously held by the Township in 2023 and the County Planning Department had issued preliminary comments dated September 18<sup>th</sup>, 2023.

As part of the most recent pre-consultation, we have reviewed the following submitted items:

- Conceptual Site Plan dated August 12<sup>th</sup> 2025

Based on our review of the above information we offer the following preliminary planning comments for consideration:

**Proposal:**

- The previous proposal was for Industrial / Commercial use with approximately 39.86 acres for Medium Density Residential / Townhomes.
- The revised proposal is for Big Box Retail, gas station and Industrial buildings of various scale.

**General Planning Comments:**

- The subject lands are located outside of an identified settlement area and outside of an identified employment area.
- Section 4.7 Urban-Area Protection prohibits new development adjacent to cities unless it is part of an urban expansion. This request is not understood to be driven by a municipally driven expansion need and would be consider major development.
- Within the County Official Plan, the subject lands are designated as Secondary Agricultural.
- Due to the land use designation, the subject lands form part of the Rural System. Permitted uses within the Secondary Agricultural Area includes all uses permitted in the Prime Agricultural Area; small-scale industrial, commercial and institutional uses and public service facilities. The subject development would not represent small-scale development.



## COUNTY OF WELLINGTON

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PLANNING AND DEVELOPMENT DEPARTMENT  
Aldo L. Salis, BES, M.Sc. MCIP, RPP Director of Planning and Development  
TEL: (519) 837-2600 ext. 2064  
EMAIL: zacharyp@wellington.ca

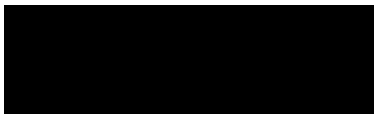
ADMINISTRATION CENTRE  
74 WOOLWICH STREET  
GUELPH, ONTARIO  
N1H 3T9

- Through the County's Municipal Comprehensive Review/5 year review, land needs for employment purposes were identified for Puslinch; however, the Puslinch by Design development project completed a detailed study of employment needs and locations to address additional lands required.
- Within the County Official Plan, Regional retail facilities are only permitted in urban centres.
- Section 11.2.6 Rural System Servicing policies identified that servicing is anticipated to be on private services (septic and well), or private communal systems subject to a Servicing Options Assessment (addressing the policies in Section 11.2.3). The County also prohibits extension of servicing into the Rural System.
- The appropriate road authority will need to review and consider the impacts of this development proposal.
- Source Water Protection comments should be provided to the applicant. It is understood the subject lands are part of a Wellhead Protection Area (D with a vulnerability score of 2) and is identified as an Issue Contributing Area.

Overall, it appears this development proposal requires more than a Zoning By-law amendment. The Provincial Planning Statement (2024) does not appear to provide a clear basis for the proposed development. Further, the County Official Plan seeks to protect and support the Rural System while also protecting cities and urban centres from major fringe development. The Official Plan does not permit the proposed uses.

I trust these comments will be of assistance. If you have questions, please contact the County of Wellington Planning and Development Department.

Yours truly,



---

Meagan Ferris, RPP MCIP  
Manager of Planning and Environment

Project: 2501.08 (Township File: D00-CUL)

August 18, 2025

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

**Attention:** Monika Farncombe  
Development and Legislative Coordinator

**RE:** Hydrogeological Comments for Zoning By-Law Amendment Application -  
Preconsultation  
2781-2809 Townline Road, Puslinch, Ontario

Wellington Hydrogeology Ltd. (WHL) is pleased to provide hydrogeological comments on the above-noted submission for 2781-2809 Townline Road, Puslinch, Ontario (the site).

Based on the applicant's submission, we understand that:

- The site is a 34.03-ha (84.10 acres) parcel zoned Agricultural (A). The site currently contains a house, barn, silo and a sales office for Reid Homes on the southwest corner, with crops covering the remaining acreage.
- The site is located immediately north of the Townline Road interchange on Highway 401. The adjacent golf course property to the east is zoned Resort Commercial (RC). Properties to the north (across Ellis Road) and south (across Highway 401) are zoned A. Properties to the west, across Townline Road, are developed commercial and residential lands within the City of Cambridge.
- The proposed Zoning By-law Amendment (ZBA) application is to rezone the site to permit commercial and industrial land uses.
- The proposed concept design includes:

- A gas station;
  - A +/- 15,090 m<sup>2</sup> big box retail store with parking for +/- 950 cars;
  - Three +/- 16,200 m<sup>2</sup> industrial buildings, each with office spaces, parking for +/- 46 trucks and +/- 170 cars; and,
  - Three +/- 10,427 m<sup>2</sup> industrial buildings, each with up to 11 divided units (each 946 m<sup>2</sup>), and parking +/- 170 cars and an unspecified number of trucks.
- Municipal servicing is not available within the Township of Puslinch on the east side of Townline Road. As such, all rural properties in the area are serviced by private water supply wells and septic systems. The urban residential properties on the west side of Townline Road are part of the City of Cambridge and receive municipal water and sewer servicing.

## Documents Reviewed

WHL reviewed the following documents in preparation of these hydrogeological comments:

1. Ware Malcomb. 2025. Conceptual Site Plan, 2809 Townline Road, Cambridge, ON, CA. File TOR25-0087-00, dated August 5, 2025.
2. J.D. Barnes Limited. 2025a. Property Survey, Reference No. 25-14-291-00-A, dated July 15, 2025.
3. J.D. Barnes Limited. 2025b. Topographic Survey, Reference No. 25-14-291-00-B-topo, dated July 15, 2025.

## Support of Application

From a hydrogeological perspective the current application is incomplete. We do not support the application based on the existing supporting documentation.

## Requirements to Consider Support of Application

A Hydrogeological Assessment is required determine support for the application from a hydrogeological perspective. The scope of the hydrogeological assessment must include:

1. Background review of topography, physiography, surficial and bedrock geology, natural heritage features and source protection areas.

2. Determination of shallow groundwater levels and groundwater flow across the site using an appropriate number of monitoring wells to characterize the shallow groundwater system.  
The scope should include:
  - a. Monitoring wells surveyed to a geodetic benchmark.
  - b. Development of all wells to remove fines and improve hydraulic connectivity to the geological formations surrounding the well annulus.
  - c. Slug tests in all monitors to estimate the hydraulic conductivity of each monitoring well.
  - d. Baseline groundwater quality sampling in a minimum of two wells, with samples submitted to an accredited laboratory for analysis of general chemistry, metals, and nutrients.
  - e. Groundwater level monitoring to determine the seasonal high and low groundwater elevations across the site.
  - f. Monitoring of additional existing wells on the site (e.g., supply wells), as practicable.
3. A description of the geology and hydrostratigraphy of the site.
4. Interpretation of the direction of shallow and deep groundwater flow across the site.
5. Assessment of existing nearby groundwater users, including MECP water well records and permits to take water within 500 m of the site, in addition to a door-to-door private well survey within 500 m of the site boundaries to assess existing usage, well construction and depths, and water quality/quantity issues.
6. Water supply assessment for the proposed development based on MECP Guideline D-5-5 Private Wells: Water Supply Assessment to demonstrate adequate water quantity and potable water quality (including general chemistry, metals, nutrients, and bacteriological parameters) for the proposed development.
7. Nitrate attenuation calculations based on MECP Guideline D-5-4 (for sewage flows under 10,000 L/day) or MECP Procedure B-7-1 (for sewage flows over 10,000 L/day).
8. Monthly water balance assessment including pre-development, post-development (without mitigation) and post-development (with mitigation).

9. Soil infiltration testing using a Guelph Permeameter (or equivalent), per the 2012 TRCA Stormwater Management Criteria, completed at appropriate locations and elevations based on proposed infiltration gallery locations.
10. Construction dewatering estimates for the proposed development, including water quantity and quality, proposed discharge location and management/mitigation plans.
11. Impact assessment to existing groundwater users and natural features.
12. The hydrogeological assessment shall be stamped by a licensed Professional Geoscientist or Professional Engineer.

Additional hydrogeological comments are provided below.

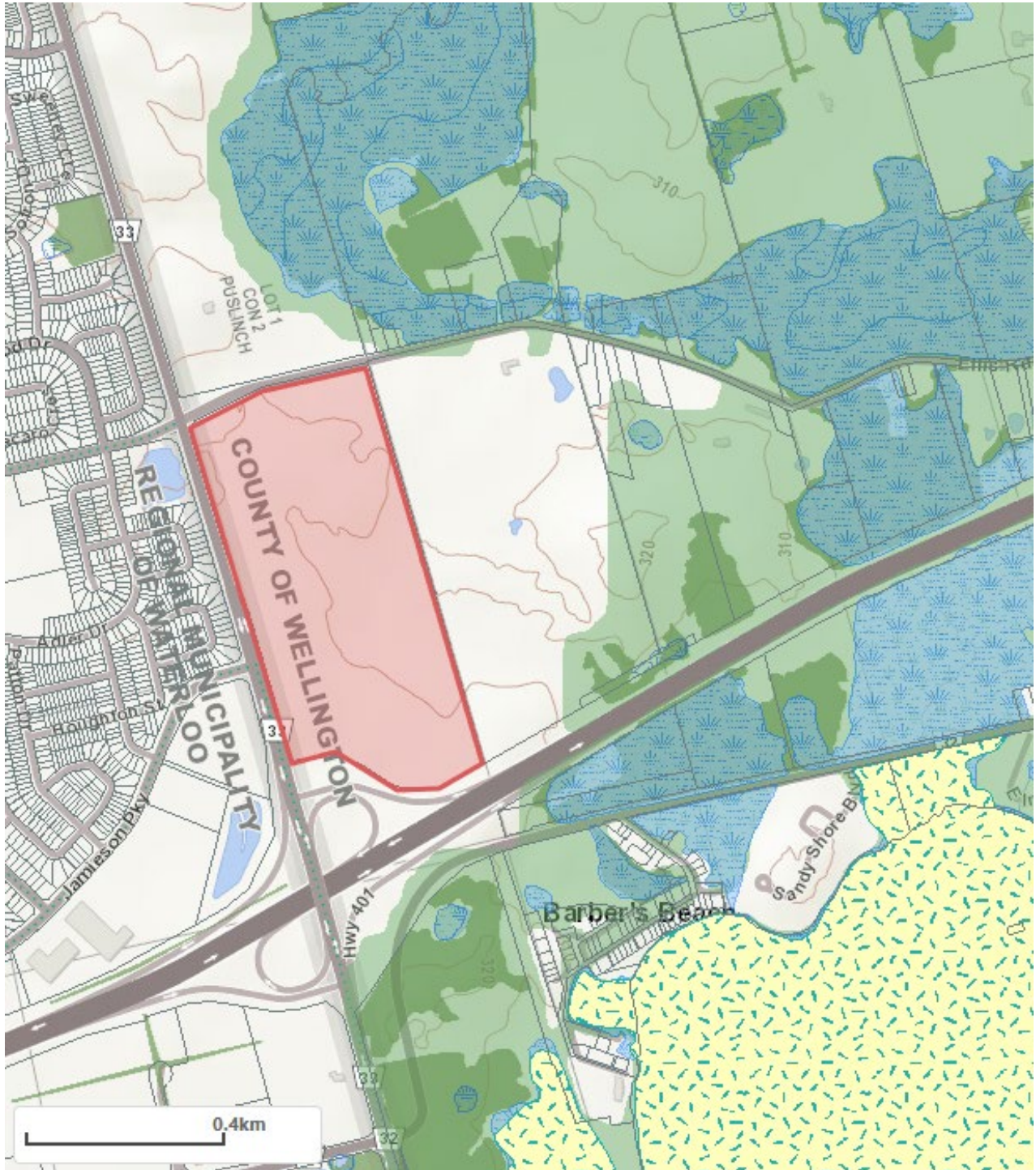
WHL notes that the comments provided herein are preliminary and may be amended following the preconsultation meeting and as additional information is received from the proponent.

## Hydrogeological Technical Comments

**Wellington County Official Plan:** The site is located within the Paris Galt Moraine Policy Area under Schedule B7 of the County of Wellington Official Plan and Section 4.9.7 Policies and Objectives will apply. The development must also adhere to Sections 4.9.3 (Groundwater), 4.9.4 (Policy Direction) and 4.9.5 (Source Water Protection).

**Source Protection:** The site is located in the Grand River Source Protection Area, and is within a Wellhead Protection Area (WHPA)-B/C/D for water quality and a WHPA-Q1/Q2 for quantity. The site is also within a mapped Significant Groundwater Recharge Area (SGRA) and Issue Contributing Area (ICA) for chloride. Source protection staff may have specific requirements based on the site's location within these features.

**Natural Features:** The site topography gently slopes to the north-northeast (J.D. Barnes Limited, 2025b) and is situated within the Ellis Creek – Speed River subwatershed within the Upper Grand River watershed, eventually discharging to Lake Erie. The site does not include any wetlands or surface water features. The nearest wetland features are a mapped approximately 100 m northeast and 150 m southeast of the site, which are both part of the Puslinch Lake Irish Creek Wetland Complex, a Provincially Significant Wetland. Additionally, a mapped Earth Science Area of Natural and Scientific Interest (ANSI) of the Puslinch Lake Bog and Wetlands, a regionally significant ANSI, is located about 480 m south-southeast of the site (see image below). Site development must not adversely impact surrounding natural features.



Source: Ontario Ministry of Natural Resources, Make A Map: Natural Heritage Areas, accessed August 18, 2025.

**Well Decommissioning:** Any unused wells must be abandoned by a licensed well contractor in accordance with R.R.O. 1990, Reg. 903: Wells.

**Supply Well Construction:** The site is underlain by the Guelph Formation and the Goat Island / Gasport Formation aquifer separated by a regional aquitard. Wells that connect these two aquifers (i.e., multi-aquifer wells) are not permitted as part of the development. Newly constructed supply wells for the site should be either installed in the upper bedrock aquifer or appropriately cased into the lower bedrock aquifer, in accordance with R.R.O. 1990, Reg. 903: Wells, to minimize potential groundwater movement between the upper and lower bedrock aquifers.

**Water Quantity and Quality:** A pumping test must be completed on the supply well(s) in accordance with MECP Guideline D-5-5 Private Wells: Water Supply Assessment to demonstrate adequate water quantity and potable water quality (including general chemistry, metals, nutrients, and bacteriological parameters) for the proposed development. A Permit To Take Water (PTTW) is required from the MECP for water takings exceeding 50,000 L/day.

**Wastewater Nitrate Attenuation:** Sewage design flows must be confirmed for the proposed development. For sewage design flows under 10,000 L/day, nitrate loading calculations for the proposed sewage system must be demonstrated in accordance with MECP Guideline D-5-4 as part of Site Plan Approval. Alternatively, sewage design flows that exceed 10,000 L/day require an Environmental Compliance Approval (ECA) from the MECP with a supporting hydrogeological assessment. Note that sewage design flows are cumulative for the site (i.e., if multiple septic systems are proposed on site, the cumulative volume must be considered).

There must be sufficient separation between the leaching bed and the high groundwater table based on the Ontario Building Code.

**Water Balance:** A monthly water balance assessment is required for the existing conditions and proposed development, including pre-development (existing), post-development (without mitigation) and post-development (with mitigation). The proposed design must infiltrate as much clean runoff (i.e., roof runoff) as possible to maintain or enhance existing recharge conditions as part of Site Plan Approval. In situ testing, using a Guelph Permeameter or equivalent (per the 2012 TRCA Stormwater Management Criteria), must be completed at appropriate locations and elevations based on proposed infiltration gallery locations (as part of detailed design).

**Excess Soil Management:** Any import/export of fill/soil from the site must be conducted in accordance with O. Reg. 406/19: On-Site and Excess Soil Management, the Rules for Soil Management and Excess Soil Quality Standards (Soil Rules) and O. Reg. 153/04, as amended.

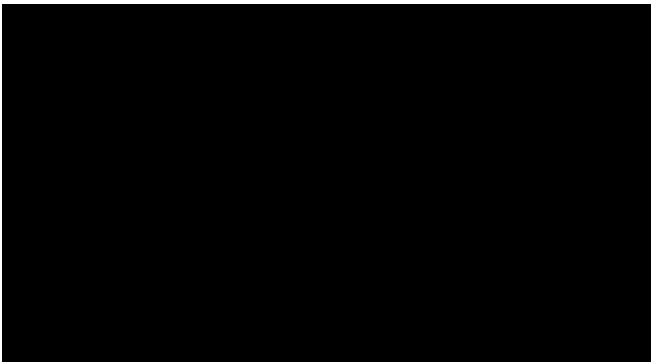
**Hazardous Building Materials:** A designated substance survey is required prior to building demolition and/or renovation activities under Section 30 of the Occupational Health and Safety Act, in accordance with Ontario Regulation (O. Reg.) 490/09: Designated Substances and O. Reg. 278/05: Designated Substance – Asbestos on Construction Projects and in Buildings and Repair Operations.

## Closure

The hydrogeological technical comments provided herein should be considered preliminary and may be updated as additional supporting materials are provided in subsequent submissions.

We appreciate the opportunity to provide these comments. Should you have any questions or concerns, please do not hesitate to contact the undersigned.

### WELLINGTON HYDROGEOLOGY LTD.



Angela Mason, M.Sc., P.Geo., QP<sub>ESA</sub>

Senior Hydrogeologist and CEO

Cell: 519-831-9696

Email: [amason@wellingtonhydrogeology.com](mailto:amason@wellingtonhydrogeology.com)

August 19, 2025

3625

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

Attention: Monika Farncombe  
Planning and Corporate Services Coordinator

**RE: 2781-2809 Townline Road, Puslinch, Proposed Zoning Bylaw  
Amendment and Industrial Development  
Peer Review of Pre-Consultation**

---

As requested, we have reviewed the Pre-Consultation Application submitted to the Township of Puslinch (the "Township") by Peter Mahovlich in support of the development of six industrial buildings, one retail store, and one gas station at 2781-2809 Townline Road, Township of Puslinch, Ontario ("subject property"). Our comments are set out below.

**Background**

The subject property is located east of Townline Road, north of the Macdonald-Cartier Freeway, and south of Ellis Road in the Township of Puslinch, Ontario. The above request was submitted to the Township of Puslinch in August 2025 identifying the proposed industrial development.

**Reviewed Materials**

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

- Conceptual Site Plan, 2809 Townline Road, Cambridge, ON, CA. Prepared by Ware Malcomb (August 2025);
- Plan of Survey of Part of Lot 1, Concession 2, Township of Puslinch, County of Wellington. Prepared by J.D. Barnes Limited (July 2025);
- Topographic Survey, Part of Lot 1, Concession 2, Township of Puslinch, County of Wellington. Prepared by J.D. Barnes Limited (July 2025);
- County of Wellington Official Plan (last updated May 2025);
- "Make a Map: Natural Heritage Areas", Ministry of Natural Resources (2025);
- Grand River Conservation Authority (GRCA) Regulation Mapping, Grand River Conservation Authority (2025); and,
- Natural Heritage Information Centre (NHIC) database (2025).

**Comments on Reviewed Materials**

Based on our review of the pre-consultation materials, the following comments are provided:

- Both the Ministry of Natural Resources (MNR) mapping (2025) and GRCA regulation mapping (2025) indicate that the subject property is adjacent (within 120m) to the

Puslinch Lake Irish Creek Provincially Significant Wetland (PSW) Complex located to northeast.

- Information available from the Natural Heritage Information Centre (NHIC) indicates records of species of special concern, including Snapping Turtle (*Chelydra serpentina*), Eastern Ribbonsnake (*Thamnophis sauritus*), and Eastern Wood-Pewee (*Contopus virens*), within proximity to the subject property.
- Trees within and directly adjacent to the subject property have the potential to be adversely affected by compacted soils, grading, runoff, and/or mechanical injuries, as well as other impacts associated with future development construction, should appropriate tree protection measures not be applied prior to future construction.
- Existing trees on the subject property may have the potential to provide suitable roosting habitat for Species at Risk (SAR) bats, including, Little Brown Myotis (*Myotis lucifugus*), Northern Myotis (*Myotis septentrionalis*), Tri-colored Bat (*Perimyotis subflavus*), Silver-haired Bat (*Lasionycteris noctivagans*), Eastern Red Bat (*Lasiurus borealis*), and Hoary Bat (*Lasiurus cinereus*). Existing structures (i.e., barns, sheds, houses, etc.) may also be serving as bat habitat.

### **Recommendations**

It is our opinion that the following steps should be taken to evaluate and address impacts associated with the proposed residential development:

- Provide a statement confirming that the adjacent PSW identified in the County Official (2025) and GRCA-regulated mapping will not be negatively impacted as a result of the proposed reconstruction on the subject property. As the PSW adjacent to the subject property is currently bounded by existing roadways, it is unlikely that it will be influenced by future construction activities on the subject property. However, the applicant should confirm that the proposed development will not adversely impact this feature and confirm this with the GRCA.
- Complete a pre-construction tree inventory including all trees >10cm Diameter at Breast Height (DBH) with the potential to be impacted by the proposed development. The findings of this inventory should be used to create a Tree Preservation Plan (TPP) that contains suitable tree protection recommendations, such as tree protection fencing in combination with Erosion and Sediment Control (ESC) measures or other measures to ensure that trees will not be negatively impacted by the proposed development and associated construction. Should existing trees require removal as a result of changes in existing grade, excessive fill, conflicts with the development footprint, or other impacts associated with the proposed development, these trees should be identified. Impacts to associated wildlife habitat, if present, as well as the replacement of trees through compensation should also be considered.
- Written consent from the adjacent landowner(s) will be required prior to the injury or removal of any boundary trees, defined as trees with stems that overlap the property boundary, where such removal or injury is necessary to facilitate construction.
- Confirmation on the presence or absence of bat habitat should be provided, supported by an assessment of the potential for habitat within trees or structures (e.g., house, barn, shed) located on the subject property. Should candidate habitat for SAR bats be identified, consultation with the Ministry of the Environment, Conservation and Parks (MECP) may be required.

- Provide mitigation measures within the TPP to minimize potential impacts to bats and nesting birds, and confirm compliance with the MECP. Mitigation measures may include the requirement for tree removals to be completed outside of the combined bat maternity roosting season and bird nesting season (April 1st – November 30th).
- As part of any future site alteration within the subject property, ESC measures should be applied prior to and during construction. These measures should be identified in adequate detail to demonstrate that the risk of runoff and sedimentation will not be impacted adjacent to natural features during construction.

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

Sincerely,  
Natural Resource Solutions Inc.



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



Sydney Gilmour, M.Sc.  
Terrestrial and Wetland Biologist



# Restricted Land Use Notice No Prohibition or Risk Management Plan Requirement

## **Issued under the *Clean Water Act*, Section 59 (2) (a)**

**Notice Number:** PUS-S59-25-008.

**Description and Date of Application/Supporting Documents:** Zoning By-law Amendment, August 13, 2025 / Drawings, Preconsultation application, WHPA Maps

**Applicant:** Todd Cullen

**Email:** todd@fieldgateproperties.com

**Roll Number:** 230100000202900 **WHPA:** IPZ-3, WHPA-B, WHPA-C, WHPA-D, ICA, WHPA-Q1, WHPA-Q2

**Vulnerability Score:** 6, 5, 4, 2, Chloride **Threats:** Sewage System Or Sewage Works - Discharge Of Untreated Stormwater From A Stormwater Retention Pond, Sewage System Or Sewage Works - Industrial Effluent Discharges, Application Of Road Salt, Storage Of Road Salt, Storage Of Snow, Handling Of A Dense Non Aqueous Phase Liquid (DNAPL), Storage Of A Dense Non Aqueous Phase Liquid (DNAPL), Water Taking Threat, Recharge Reduction Threat

**Property Address:** 2781-2809 Townline RD **Town:** Puslinch

**Municipality:** Township of Puslinch **Province:** Ontario **Postal Code:** N3C 4L9

**Source Protection Plan:** Grand River **Drinking Water System:** Waterloo

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### **Property Owner Information**

Fieldgate Properties c/o Todd Cullen

5400 Yonge Street

Unit 300

Toronto, Ontario

M2N 5R5



This Notice is being issued under subsection 59 2(a) of the Clean Water Act, 2006 and was prepared in response to an Application (as described above under Description / Supporting Documents) received for the property that is identified above. One or more of the land uses proposed to be engaged in, at the above noted property, has been designated as a restricted land use under Section 59 of the *Clean Water Act* and the application is either for a provision of the *Planning Act* prescribed under Section 62, Ontario Regulation 287/07 of the *Clean Water Act* or for a building permit under the *Ontario Building Code*.

The Application was reviewed in accordance with the *Clean Water Act* and the Grand River Source Protection Plan as amended. Based on the information submitted as part of the Application, Section 57 (Prohibition) or Section 58 (Risk Management Plan) of the *Clean Water Act* **do not** apply, at this time, to the activities outlined in the Application for the above referenced property.

**Rationale:** This Notice pertains to a Zoning By-law Amendment application submitted for 2781-2809 Townline Road, Puslinch. To deem the ZBA application complete, a Section 59 (2) (a) Notice is being provided. Please note that a Risk Management Plan (RMP) will be required for this site and will include, but is not limited to, winter maintenance activities and chemical handling and store. Comments pertaining to the RMP and Source Protection requirements will be provided during future planning applications.

- This Notice is only effective as it relates to the above referenced Application
- Any change to the information submitted under the Application nullifies this Notice, unless otherwise permitted by the Risk Management Official.
- This Notice is not valid for any subsequent approvals under the *Planning Act* or building permits under the *Ontario Building Code* for the property. Further Section 59 notices will be required for subsequent applications at the property and a risk management plan may be required.
- Pursuant to Section 53 (3), Ontario Regulation 287/07 under the *Clean Water Act*, this notice, once issued, is a public document. All information submitted for development of this notice is subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).



This Notice has been issued under the Authority of the Risk Management Official appointed for the Township of Puslinch under by-law 62/15. This Notice has been issued in accordance with the *Clean Water Act*, 2006, Section 59, Ontario Regulation 287/07 and the Grand River Source Protection Plan as amended.

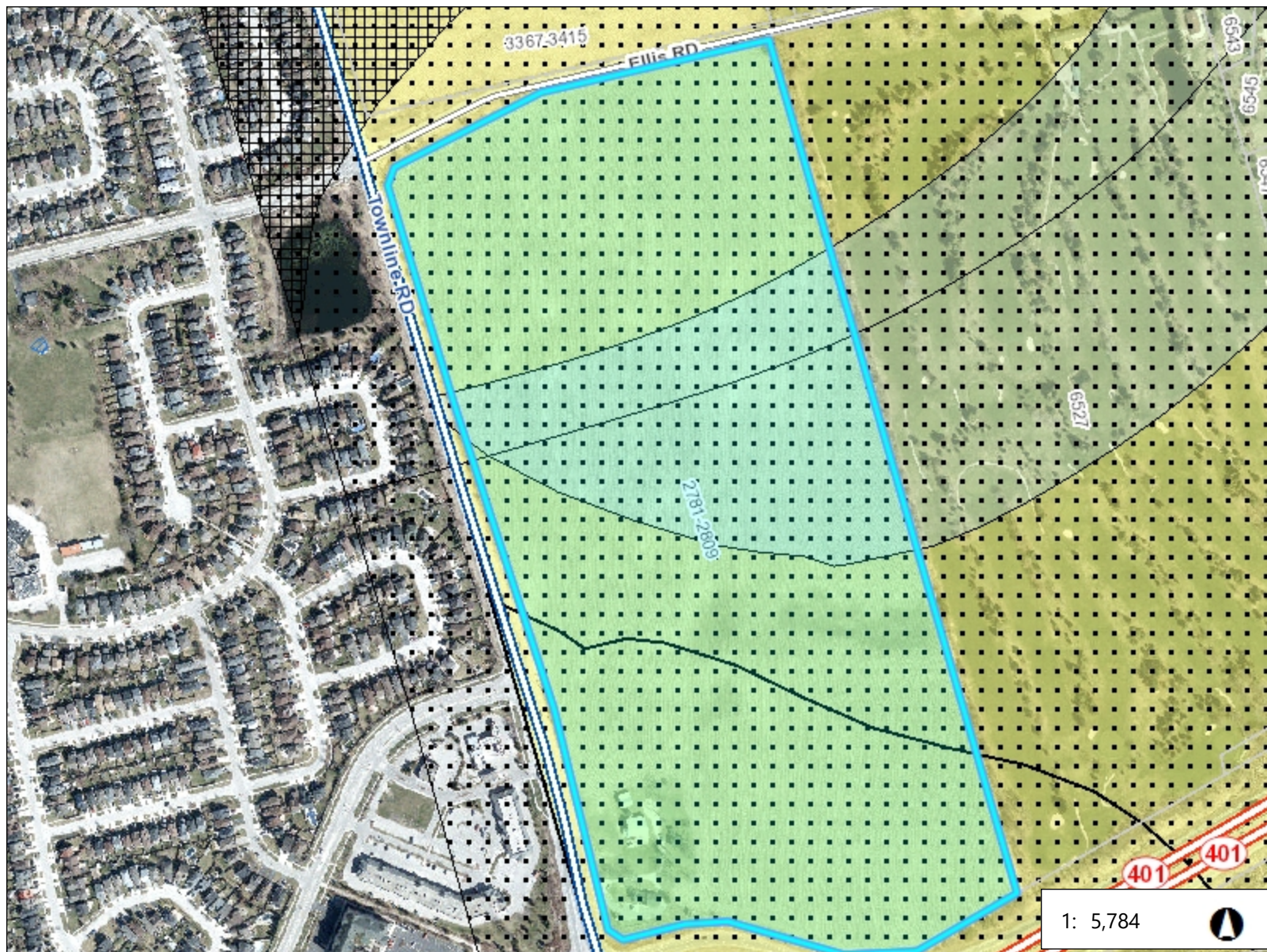
If you require further information, please contact the undersigned.

2025-08-18

Kyle Davis, Risk Management Official  
519-846-9691 ext. 362  
[kdavis@centrewellington.ca](mailto:kdavis@centrewellington.ca)

Attachment(s): WHPA Map(s)

Wellington Source Water Protection is a municipal partnership between Township of Centre Wellington | Town of Erin | Guelph / Eramosa Township | Township of Mapleton | Town of Minto | Township of Puslinch | Township of Wellington North | County of Wellington. The purpose of the Clean Water Act is to protect existing and future sources of drinking water.



Legend

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

0.3 0 0.15 0.3 Kilometers

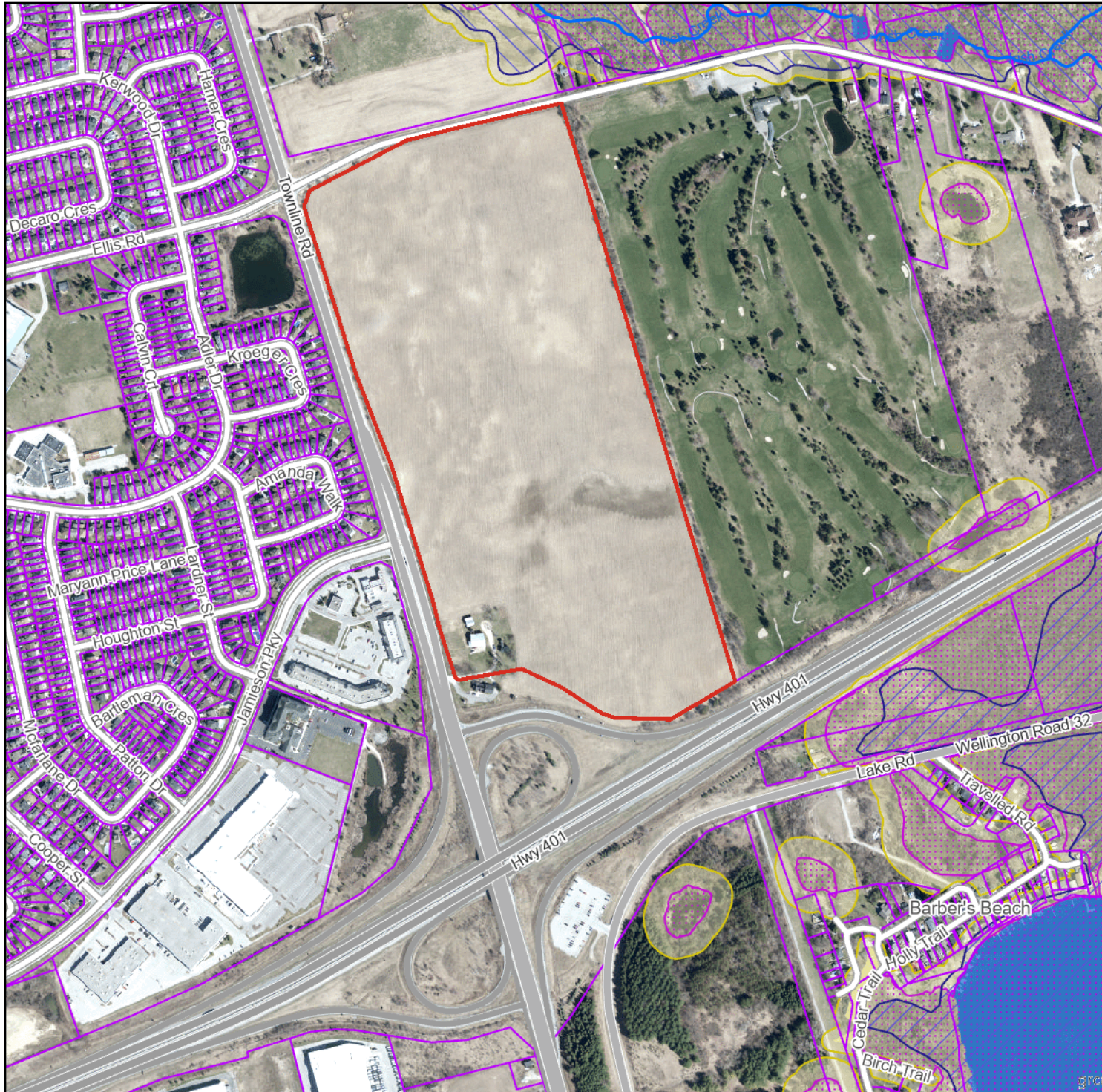
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

Produced using information under License with the Grand River Conservation Authority. Copyright © Grand River Conservation Authority, 2022.

THIS IS NOT SURVEY DATA. Parcels - Teranet 2002, Wellington County 2025

Notes





Legend

- Regulation Limit (GRCA)
- Floodplain (GRCA)**
  - Engineered
  - Estimated
  - Approximate
- Floodplain - Special Policy Area (GRCA)
- Slope Erosion (GRCA)**
  - Steep
  - Oversteep
  - Toe
- Slope Valley (GRCA)**
  - Steep
  - Oversteep
- Regulated Watercourse (GRCA)
- Regulated Waterbody (GRCA)
- Wetland (GRCA)
- Lake Erie Flood (GRCA)
- Lake Erie Shoreline Reach (GRCA)
- Lake Erie Dynamic Beach (GRCA)
- Lake Erie Erosion (GRCA)
- Parcel - Assessment (MPAC/MNRF)
- Conservation Area Boundary (GRCA)

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Disclaimer: This map is for illustrative purposes only. Information contained herein is not a substitute for professional review or a site survey and is subject to change without notice. The Grand River Conservation Authority takes no responsibility for, nor guarantees, the accuracy of the information contained on this map. Any interpretations or conclusions drawn from this map are the sole responsibility of the user. The source for each data layer is shown in parentheses in the map legend. See Sources and Citations for details.



**Ministry of Transportation**

West Operations  
Corridor Management Section West

659 Exeter Road  
London, Ontario N6E 1L3  
Telephone: (226) 973-8580  
Facsimile: (519) 873-4228

**Ministère des Transports**

Opérations ouest  
Section de la gestion des couloirs routiers de l'Ouest

659, chemin Exeter  
London (Ontario) N6E 1L3  
Téléphone: (226) 973-8580  
Télécopieur: (519) 873-4228



August 13, 2025

**To: Monika Farncombe, Township of Puslinch**

**Re: Pre-consultant - 2781-2809 TOWNLINE RD.**

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The Ministry of Transportation (MTO) has completed its review of the concept plan prepared by Ware Malcomb dated 08-05-2025 for property located at 2809 Townline Road, Puslinch. The concept plan has been considered in accordance with the requirements of our highway access control policies and the *Public Transportation and Highway Improvement Act* (PTHIA). MTO's Highway Corridor Management Manual (HCMM) and all related guidelines and policies. The following outlines our comments:

The site is adjacent to Highway 401, a Class 1A - Freeway with a posted speed limit of 100km/h, that is designated as a Controlled Access Highway (CAH). As such, all requirements, guidelines and best practices in accordance with this classification and designation shall apply.

The owner should be aware that the property falls within MTO's Permit Control Area (PCA), and as such, MTO Permits are required before any demolition, grading, construction or alteration to the site commences. In accordance with the Ontario Building Code, municipal permits may not be issued until such time as all other applicable requirements (i.e.: MTO permits/approvals) are satisfied.

**Site Access.**

The subject property's proposed access does not meet MTO's desirable offset spacing requirement of 800m for a new commercial access connection from an existing commercial access, public road or interchange. MTO will require that access be achieved from Ellis Road.

**Building and Land Use.**

MTO Building and Land Use Permit will be required. As a condition of MTO permits, the following shall be provided:

- The Proponent shall submit an acceptable Site Plan, Grading Plan, Drainage Plan, Illumination Plan, Erosion Control Plan and Site Servicing Plan for MTO review and approval. These plans shall clearly identify all structures/works (existing and proposed). MTO requires all buildings, structures and features integral to the site

to be located a minimum of 14 metres from the highway property limit, inclusive of fire-lanes, parking and stormwater management facilities.

### **Traffic Impact Study.**

MTO will require the owner to submit a Traffic Impact Study to MTO for review and approval, indicating the anticipated volumes of traffic and its impact upon the provincial highway network.

- The TIS will be prepared by a Registry, Appraisal and Qualification System (RAQS) qualified transportation consultant in accordance with MTO TIS Guidelines attached.
- The MTO list of Prequalified Engineering Service Providers (ESPs), completing Traffic Impact Analysis is publicly available on [MTO Technical Documents](#) website, under Qualifications.
- MTO will be available to review the TIS scope of work once prepared, to ensure MTO concerns are addressed.
- Should Highway improvements be identified as warranted and as a condition of MTO permits, the improvements will be designed and constructed to the standards and approval of MTO at the cost of the developer.

### **Storm Water Management Report (SWMR).**

As a condition of MTO permits, to ensure that stormwater runoff from this property does not adversely affect our highway drainage system or highway corridor, an SWMR will be required and will need to adhere to the MTO Stormwater Management Requirements for Land Development Proposals and utilize the MTO Intensity Duration Frequency (IDF) Curves.

- The drainage engineer/consultant should refer to the ministry website for applicable IDF curves, Highway Drainage Design Standards (2008) and the ministry's Stormwater Management Requirements for Land Development Proposals. <https://idfcurlines.mto.gov.on.ca/terms.shtml>
- The drainage engineer/consultant shall ensure that all return periods are assessed (2yr, 5yr, 10yr, 25yr, 50yr, 100yr and Regional).

The Ministry of Transportation reviews the conveyance of flows based on the Ministry's Stormwater Management Technical Guidelines only. The developer must obtain all necessary approvals from other jurisdictional agencies.

### **Signs**

Any/all signage visible from Highway 401 including temporary development signs, must be identified on the plans, must conform to MTO policies and guidelines, and will require a valid MTO Sign Permit before installation. The minimum Commercial Signage setback is 3.0m.

If you have any questions, please do not hesitate to contact me directly.

Regards,

O'Neil Nembhard  
Corridor Management Planner  
Highway Corridor Management Office  
West Region

**Appendix B:**

# **Draft Official Plan Amendment**

**THE CORPORATION OF THE COUNTY OF WELLINGTON**

BY-LAW NO. \_\_\_\_

A BY-LAW TO ADOPT AMENDMENT NO. \_\_ TO THE  
OFFICIAL PLAN FOR THE COUNTY OF WELLINGTON

The Council of the County of Wellington, pursuant to the provisions of the Planning Act, R.S.O. 1990, as amended, does hereby enact as follows:

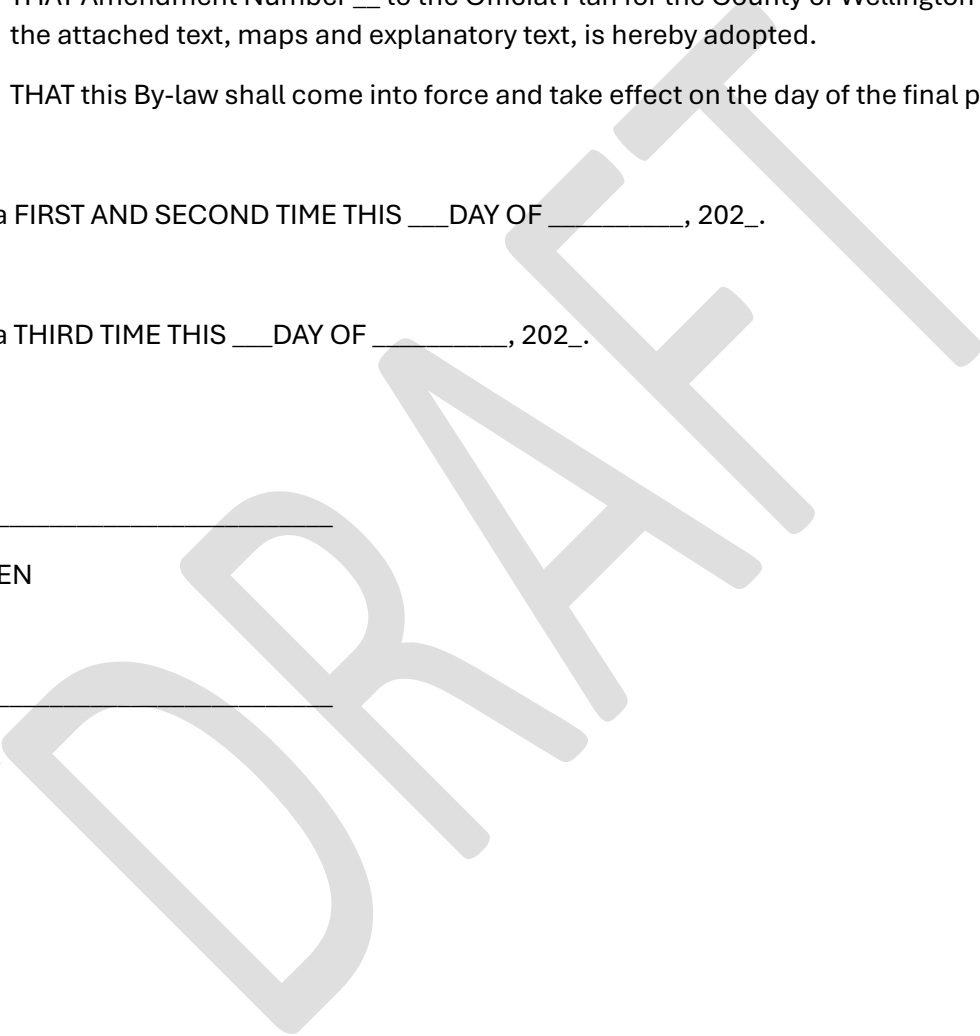
- 1. THAT Amendment Number \_\_ to the Official Plan for the County of Wellington consisting of the attached text, maps and explanatory text, is hereby adopted.
- 2. THAT this By-law shall come into force and take effect on the day of the final passing thereof.

READ a FIRST AND SECOND TIME THIS \_\_\_\_ DAY OF \_\_\_\_\_, 202\_.

READ a THIRD TIME THIS \_\_\_\_ DAY OF \_\_\_\_\_, 202\_.

\_\_\_\_\_  
WARDEN

\_\_\_\_\_  
CLERK



**AMENDMENT NUMBER \_\_**  
**TO THE**  
**COUNTY OF WELLINGTON OFFICIAL PLAN**

**INDEX**

**PART A – THE PREAMBLE**

The Preamble provides an explanation of the proposed Amendment including the purpose, location, and background information, but does not form part of this Amendment.

**PART B – THE AMENDMENT**

The Amendment describes the changes and/or modifications to the County of Wellington Official Plan which constitute Official Plan Amendment Number \_\_.

**PART C – THE APPENDICES**

The Appendices, if included herein, provide information related to the Amendment, but do not constitute part of the Amendment.

## PART A – THE PREAMBLE

### PURPOSE

The purpose of this Official Plan Amendment is to redesignate the subject site currently designated *Secondary Agricultural Area* to *Rural Employment Area* and *Policy Area (PA7-X)*. The Amendment will permit industrial, limited commercial, retail and gas bar uses.

The subject site is proposed to serve a special function that does not fit into a traditional land use designation at this time due to its location, servicing requirements, and the special characteristics of the area - most notably its adjacency to Highway 401, a regional road, and an urban area within the City of Cambridge. In addition to the permitted uses of the *Rural Employment Area* designation, the lands will be used for retail and gas bar uses subject to appropriate zoning and the applicable policies of the Official Plan.

### LOCATION

The site subject to the proposed amendment is located within the Township of Puslinch. The subject site is generally rectangular in shape and bound by Townline Road (Wellington 33) and the City of Cambridge to the west, and the Highway 401 corridor and Townline Road interchange to the south. The subject site is described legally as Part of Lot 1 Concession 2, Township of Puslinch, County of Wellington, and has an area of approximately 34 hectares.

### BACKGROUND

Official Plan Amendment and Zoning By-law Amendment applications were submitted in November 2025. The applications were partially resubmitted in February 2026. The applications included detailed studies, reports, and plans to support the proposed development. An informal pre-consultation meeting occurred September 21, 2023. A formal pre-consultation meeting occurred August 21, 2025.

### BASIS

The amendment modifies Schedules “A7” and “B7” to remove the *Secondary Agricultural Area* designation and redesignate the subject site to *Rural Employment Area* and *Policy Area (PA-X)*. The subject site has immediate access to the Highway 401 corridor and a Regional Road, and is adjacent to Hespeler Village in the City of Cambridge, Regional Municipality of Waterloo. The proximity of the site to surrounding uses and its provincial highway and regional road access to labour, goods, and services will help ensure the long-term operational and economic viability of the planned uses.

This Amendment proposes to adopt the policies of the *Rural Employment Area* designation with site-specific exceptions, which are provided by the policies of the *Policy Area (PA7-X)*. These site-specific exceptions include that in addition to the permitted uses of the *Rural Employment Area*, as provided in Section 6.8.2 of the Official Plan, the site will be used for retail and gas bar uses, including that of retail commercial uses that are normally found in primary and secondary urban centres.

No uses include water-intensive industrial operations or the generation of industrial-strength wastewater. Water usage is not required for input into industrial assemblies, manufacturing, packaging, fabrication, repair, or storage activities. As such, the proposed uses are consistent with the intent of Section 6.8.1 and 6.8.2 of the Official Plan as it pertains to dry industrial and limited commercial uses in the *Rural Employment Area* designation. The owner shall enter into a

Development Agreement with the municipality to ensure the appropriate sewage and water servicing is in place prior to permanent year-round occupation being permitted.

The proposed redesignation and subsequent development will incorporate land use compatibility measures per Section 6.8.3 of the Official Plan to mitigate any potential adverse effects on surrounding land uses. Class III industrial uses, medical marihuana production facility, and sawmill uses are strictly prohibited on the subject site.

The full basis for this Amendment has been set out in the Planning Justification Report and related supplementary materials submitted in support of this Amendment.

#### **IMPLEMENTATION AND INTERPRETATION**

The implementation and interpretation of this Amendment shall be in accordance with the relevant policies of the County of Wellington Official Plan.

DRAFT

## PART B – THE AMENDMENT

All of this part of the document entitled “PART B – The Amendment”, consisting of the following text constitutes Amendment No. \_\_ to the County of Wellington Official Plan.

### DETAILS OF THE AMENDMENT

The Official Plan of the County of Wellington is hereby amended as follows:

#### PART 9 – LOCAL PLANNING POLICY

1. That Section 9.8 Puslinch Local Policies is amended by adding the following text to Section 9.8.6:

##### *PA7-X* – 2809 Townline Road

- a. “The land identified as *PA7-X* on Schedule *X* of this Plan relates to a proposed development at 2809 Townline Road. In addition to the uses permitted within the *Rural Employment Area* designation per Section 6.8.2 of the Official Plan, a retail store with a maximum gross floor area of 17,500 m<sup>2</sup> and gas bar are also permitted. Notwithstanding any provisions in this Plan to the contrary, this may include retail commercial uses and service commercial uses that are normally found in primary and secondary urban centres.
  - i. For the purpose of this exception, “maximum gross floor area” means the total floor area of a building measured from the centreline of partition walls and the exterior faces of the outside walls, but does not include any floor area in a cellar, attic or garage, any porch or verandah, any amenity area or private amenity area, any floor area which does not have a clear floor to ceiling height of 2.286 metres, or any floor area used for parking.
- b. Class III industrial uses, medical marihuana production facility, and sawmill uses are strictly prohibited.
- c. Industrial uses are to be “dry” in nature and consistent with the intent of the Official Plan, as provided in Section 6.8.1 and 6.8.2. The owners shall enter into a Development Agreement with the municipality to ensure the appropriate sewage and water servicing is in place prior to permanent year-round occupation being permitted.”
- d. Prior to any development, the developer/owner shall provide the County of Wellington with satisfactory land use compatibility, site servicing, geotechnical, hydrogeological, stormwater management, agricultural, environmental, and traffic assessments.

## SCHEDULES

2. Schedule A7, County Growth Structure Puslinch, is amended by redesignating the lands subject to this amendment to *Rural Employment Area*, as shown on Schedule “A”.
3. Schedule B7, Land Use Puslinch, is amended by redesignating the lands subject to this amendment that are presently designated *Secondary Agriculture Area* to *Rural Employment Area* and *Policy Area (PA7-X)*, as shown on Schedule “B”.

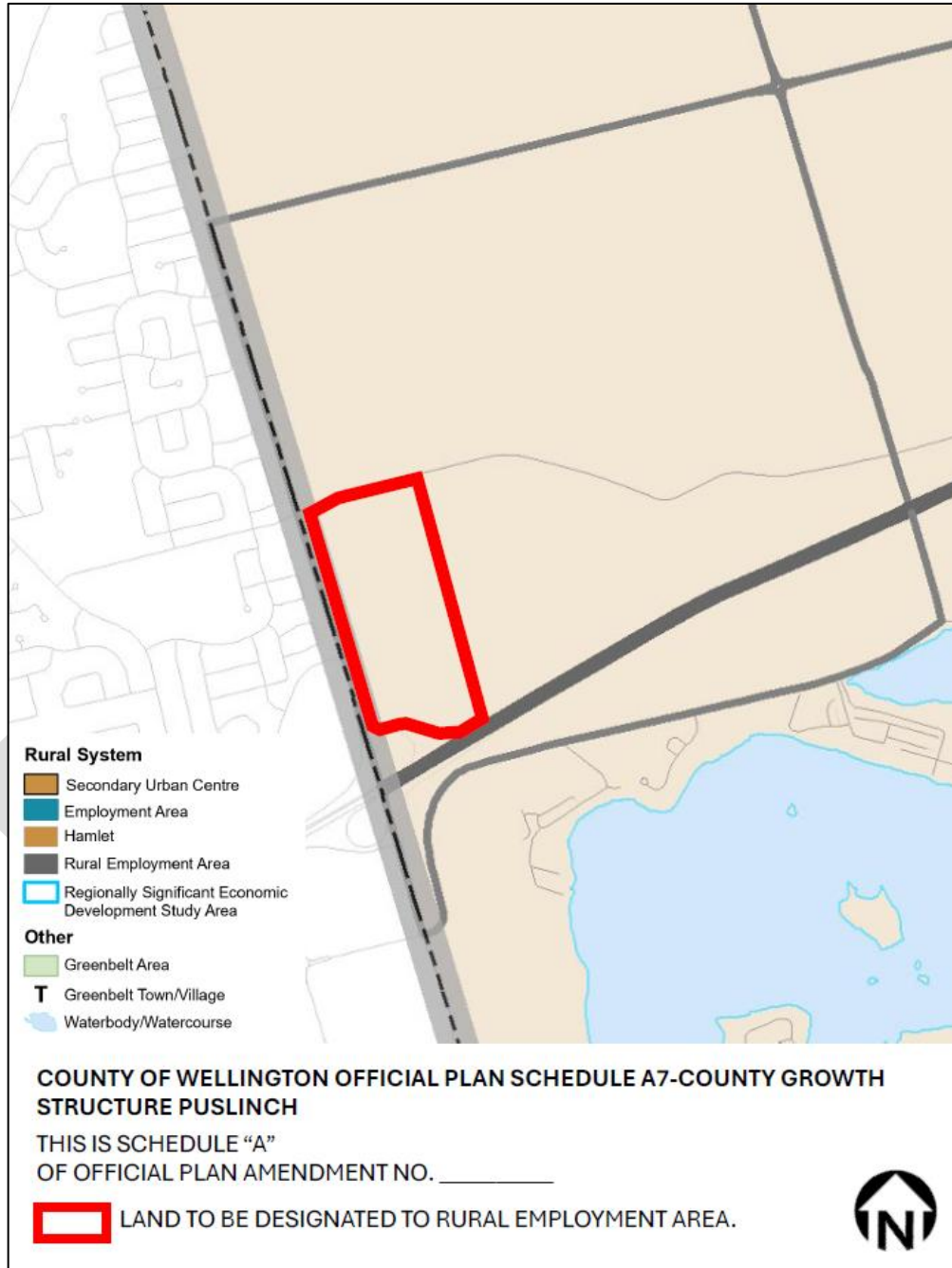
DRAFT

**THE CORPORATION OF THE COUNTY OF WELLINGTON**

**SCHEDULE "A"**

OFFICIAL PLAN AMENDMENT NO. \_\_\_\_

**COUNTY OF WELLINGTON OFFICIAL PLAN  
SCHEDULE A7 – COUNTY GROWTH STRUCTURE PUSLINCH**



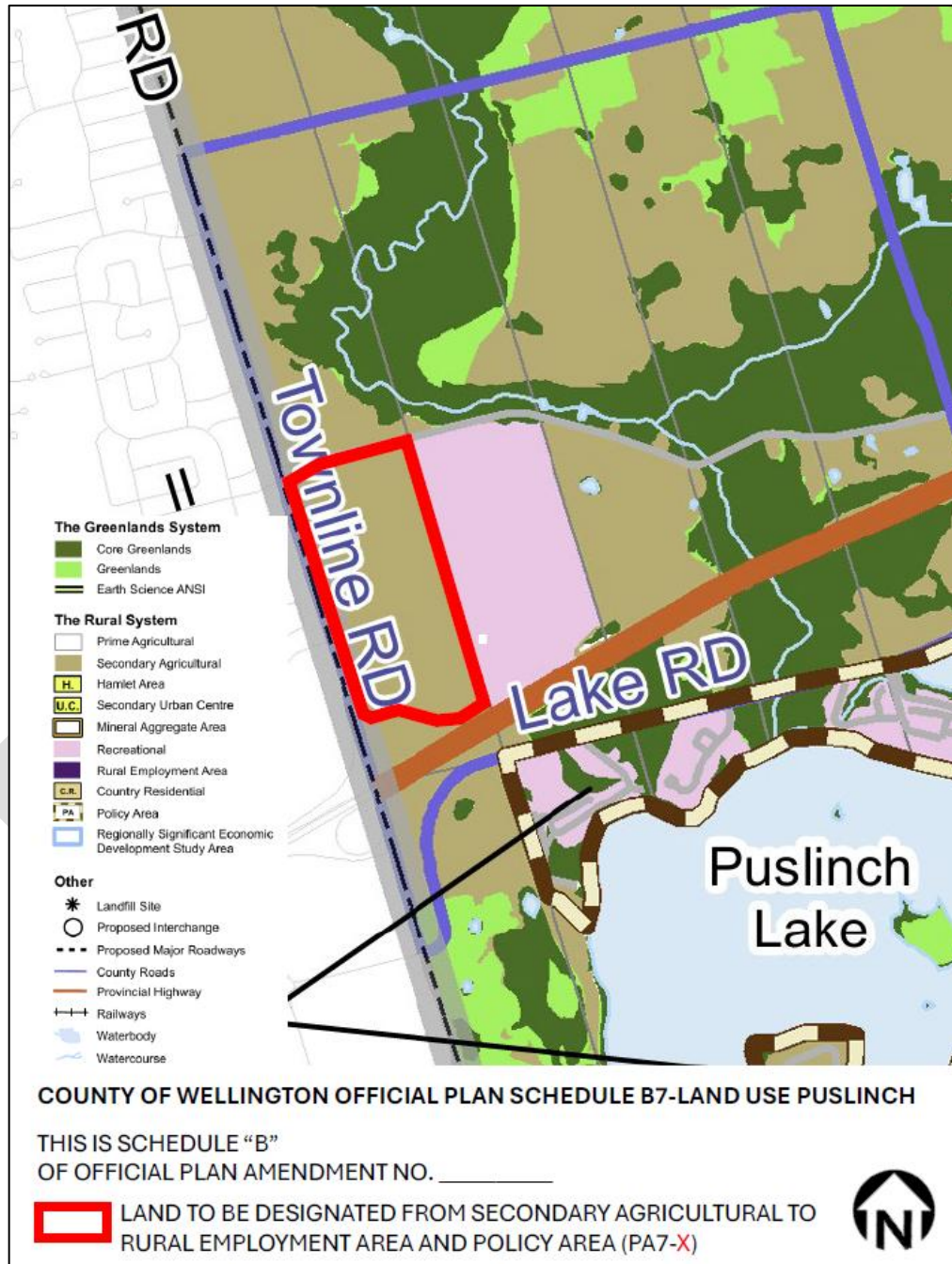
THIS IS SCHEDULE "A" OF AMENDMENT NO. \_\_ TO THE COUNTY OF WELLINGTON  
OFFICIAL PLAN DATED THIS \_\_ TH DAY OF \_\_\_\_, 202\_.

THE CORPORATION OF THE COUNTY OF WELLINGTON

SCHEDULE "B"

OFFICIAL PLAN AMENDMENT NO. \_\_\_\_

COUNTY OF WELLINGTON OFFICIAL PLAN  
SCHEDULE B7 – PUSLINCH LAND USE



THIS IS SCHEDULE "B" OF AMENDMENT NO. \_\_\_\_ TO THE COUNTY OF WELLINGTON  
OFFICIAL PLAN DATED THIS \_\_\_\_ TH DAY OF \_\_\_\_, 202\_\_.

**Appendix C:**

# **Draft Zoning By-law Amendment**

## THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

### BY-LAW NUMBER 202\_ - \_\_\_\_

A by-law to amend By-law Number 023/18, as amended, being the Zoning By-law of the Township of Puslinch.

**WHEREAS** the Council of the Corporation of the Township of Puslinch deem it appropriate and in the public interest to amend By-law Number 023/18 pursuant to the Planning Act, R.S.O. 1990, c.P.13 as amended;

### **NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF PUSLINCH ENACTS AS FOLLOWS:**

1. THAT Schedule "A" of By-law 023/18 is hereby amended by rezoning Part of Lot 1, Concession 2, Township of Puslinch, County of Wellington, from Agricultural (A) to site-specific Industrial (IND) Zones IND(spXX) on Part A and IND(spXXX) on Part B, as shown on Schedule 'A' of this By-law;
2. THAT notwithstanding section 9.2 PERMITTED USES, for lands zoned IND(spXX) on Part A and IND(spXXX) on Part B per Schedule 'A' of this By-law, the following uses are strictly prohibited:
  - Class III Industrial Uses
  - Medical Marihuana Production Facility
  - Sawmill
3. THAT in addition to the uses permitted in the IND zone, retail store and gas bar uses shall also be permitted on the lands zoned IND(spXX) on Part A only, as shown on Schedule 'A' of this By-law;
4. THAT section 14.0 SITE-SPECIFIC SPECIAL PROVISIONS is amended by adding the following new exception:

#### **IND(spXX) 2809 Townline Road**

Notwithstanding any provision of this By-law to the contrary, for lands zoned IND(spXX) on Part A per Schedule 'A' of this By-law, the following special provisions shall apply:

MAXIMUM GROSS FLOOR AREA FOR RETAIL STORE USES: 17,500 m<sup>2</sup>

For the purpose of this exception, "maximum gross floor area" means the total floor area of a building measured from the centreline of partition walls and the exterior faces of the outside walls, but does not include any floor area in a cellar, attic or garage, any porch or verandah, any amenity area or private amenity area, any floor area which does not have a clear floor to ceiling height of 2.286 metres, or any floor area used for parking.

5. THAT notwithstanding any provision of this By-law to the contrary, no buildings shall be permitted within the hatched areas shown on Schedule 'B' of this By-law;

6. THAT except as amended by this By-law, the land as shown on the attached Schedule 'A' and Schedule 'B' shall be subject to all applicable regulations of Zoning By-law 023/18, as amended;
7. That this By-law shall come into effect from the date of passing by Council and come into force in accordance with the requirements of the Planning Act, R.S.O., 1990, as amended.

By-law read a First, Second, and Third Time this of \_\_\_\_\_, 202\_

\_\_\_\_\_  
MAYOR

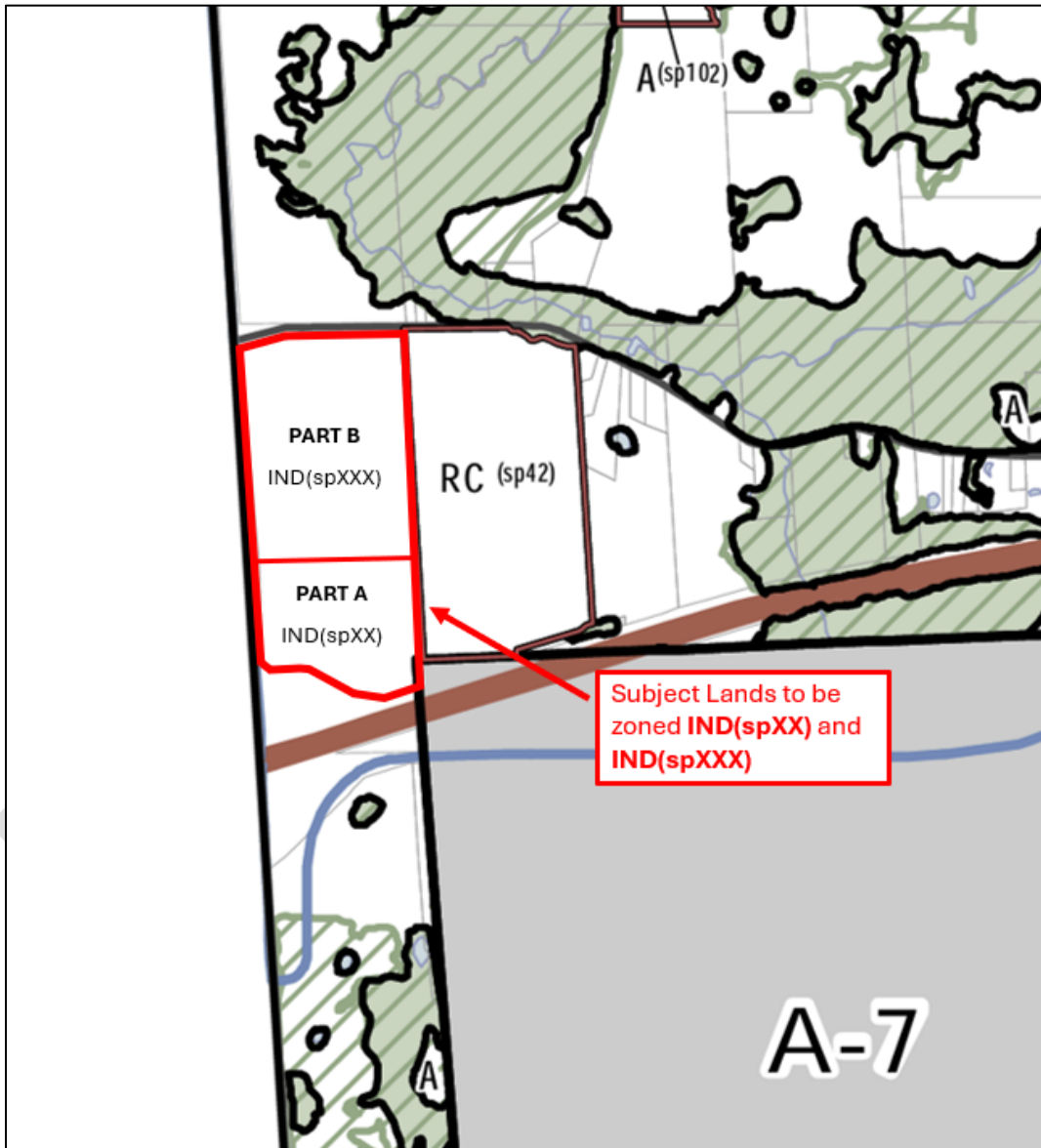
\_\_\_\_\_  
CLERK

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THE CORPORATION OF THE TOWNSHIP OF PUSLINCH

BY-LAW NUMBER 202\_ - \_\_\_\_

SCHEDULE 'A'



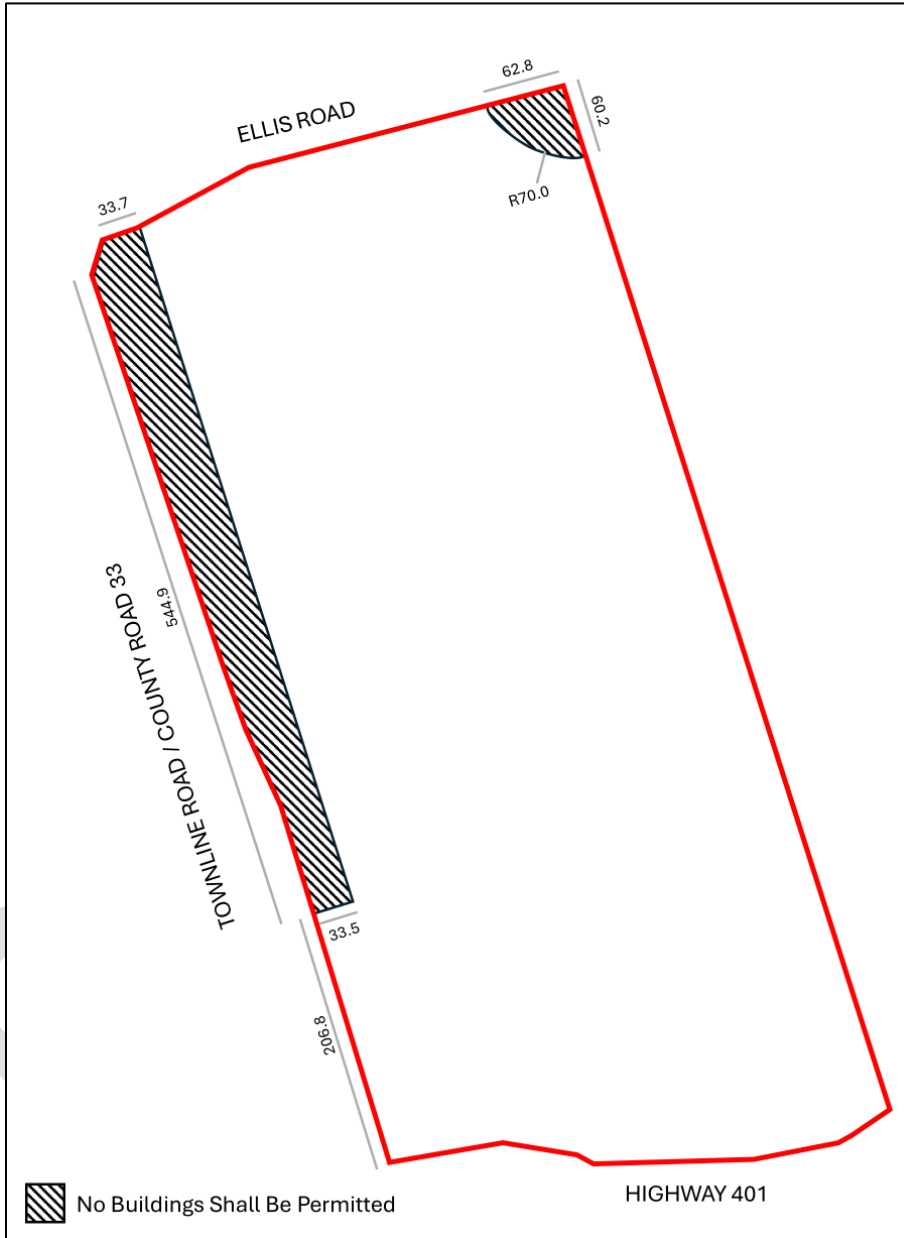
Location:  
PART OF LOT 1  
CONCESSION 2


Township of Puslinch  
County of Wellington  
2809 Townline Road

THIS IS SCHEDULE 'A'  
TO BY-LAW AMENDMENT \_\_\_\_\_



**SCHEDULE 'B'**



 No Buildings Shall Be Permitted

HIGHWAY 401

Location:  
PART OF LOT 1  
CONCESSION 2

THIS IS SCHEDULE 'B'  
TO BY-LAW AMENDMENT \_\_\_\_\_



Township of Puslinch  
County of Wellington  
2809 Townline Road

Not to scale.

Note:  
All measurements are in metres,  
unless otherwise noted.

**Appendix D:**

# **CBRE Memo - Support for Development**

**M E M O**

Date: September 15, 2025

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To: Todd Cullen – Fieldgate Properties

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From: Ted Overbaugh - CBRE Limited

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Subject: 2809 Townline Rd, Puslinch - Support for Development

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Todd,

We have reviewed the opportunity at 2809 Townline Road in Puslinch and have a favourable view of this parcel from an industrial development standpoint. The site is very appealing for industrial development and checks a lot of boxes of what companies and prospective tenants are looking for;

- Appealing 401 frontage
- Easy 401 access at major interchange
- Access to immediate labour pool
- Public transit access
- Nearby amenities – gas, banks, restaurants

We work closely with various industrial users, locally and international, in surveying and sourcing new industrial facilities across Southern Ontario. The areas to the west of Toronto have seen a steady flow of interest, particularly the KWC-Guelph areas as there is good highway access, coupled with skilled labour. One of the challenges groups have making decisions in this area is finding suitable locations that check all the primary boxes; public transit, immediate highway access, and strong local labour. The subject site achieves all those and as a result we feel that it is well suited and would be attractive to various users in the market. We have had success bringing major users to communities like Brantford to infill industrial sites, that were chosen specifically with these major items in mind. Sites that are outside core areas have seen a significant drop off in demand and interest; distance to a major highway, no public transit, small nearby labour pool. While sites that do check these boxes remain attractive, particularly for out of town/out of province groups who hire new and don't want to take on risk of not being able to tap into a nearby labour pool.

Further to this while there is existing industrial availability in the market today, we are seeing an uptick in users needing specialized buildings with cranes, heavy power, or specific building layouts, which this site could lend itself to given the flexibility and planning stages of it.

Regards,  
CBRE Limited



Ted Overbaugh  
Senior Vice President, Industrial & Logistics  
Cc: Kyle Hanna, Vice Chairman, CBRE Limited

**S | P**

2026