

AUGUST 12, 2026

PROJECT NO: 2996-7616

SENT VIA: EMAIL
MFARNCOMBE@PUSLINCH.CA

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

Attention: Monika Farncombe, Development and Legislative Coordinator

**RE: PLANNING COMMENT D.VI. FOR ZONING BY-LAW AMENDMENT APPLICATION
2781-2809 TOWNLINE ROAD
PUSLINCH, ONTARIO**

Dear Ms. Farncombe,

This letter has been prepared in response to the following comment received from NPG Planning Solutions in a letter dated May 25, 2026, regarding the Zoning By-Law Amendment Application for 2781-2809 Townline Road in Puslinch Ontario (Site):

- **Comment d.vi.:**

The Puslinch Zoning By-law provides a definition for “dry industrial uses” as uses which do not require significant water and sewage disposal requirements. The Private Servicing Assessment dated November 10, 2025 provided an estimated water and sewage disposal for the industrial use component to be 25,650 L per day and 35,190 L per day, for concepts A and B respectively. The Puslinch Zoning By-law considers sewage disposal system associated with the industrial activities that exceeds 10,000 L per day as significant. Please advise on how this will be addressed in the Zoning By-law Amendment application. Additionally, please consider updating the analysis of how the proposed uses do not produce significant amounts of effluent as per Section 6.8.1.

- Response to Comment d.vi.:

The two (2) development concepts for the Site indicate that the proposed development will consist of non-water-intensive dry industrial uses and/or retail purposes with ancillary office space. While the total daily design sewage flow and water demand for the proposed development for either concept will exceed 10,000 L/day and 50,000 L/day, respectively, the wastewater generated and water consumed will be domestic in nature and are consistent with a “dry” industrial use.

The Township of Puslinch Comprehensive Zoning By-law (April 2018) defines Dry Industrial Use as:

Any premises used for manufacturing, processing, fabrication and assembly of raw materials or repair, servicing, distribution and storage of materials, where:

- a. *No significant water requirements are necessary as part of the assembly, manufacture, fabrication, repair, packaging and storage activities; and;*
- b. *No significant sewage disposal requirements are necessary as part of the assembly, manufacture, fabrication, repair, packaging and storage activities; and;*
- c. *For the purposes of this definition, significant water requirements are defined as water use requiring a Permit To Take Water and/or greater than 50,000 litres of water per day.*
- d. *For the purposes of this definition, significant sewage disposal requirements are defined as sewage disposal systems that exceed 10,000 litres per day of discharge.*

The maximum daily design sewage flows for concept plan A and B were each calculated in accordance with Table 8.2.1.3.B of the Ontario Building Code, as summarized in Crozier's Private Servicing Assessment (July 30, 2026).

In both concepts A & B, approximately 80% of the projected industrial building wastewater flow is from water closets and office employees, which is clearly a non-industrial use. The remaining 20% (approximately 25,000 – 35,000 L/day) is attributed to the loading bays of the warehouse occupancy, as required by Table 8.2.1.3B of the OBC. This appears to be the allocation that the review comment has specifically identified as the "industrial use component". However, this allocation is non-industrial in nature, as it is intended to capture domestic wastewater generated by truck drivers and delivery personnel who are transient to the site and wouldn't normally be captured in the employee count for the building. Therefore, there is no industrial wastewater allocations for the buildings, as the entirety of the flow is intended to capture domestic type uses from employees, drivers and visitors to the Site.

Under both development concepts, no process or industrial wastewater is anticipated to be generated as part of any assembly, manufacture, fabrication, repair packaging or storage activities. Wastewater generated on site, and the resulting wastewater characteristics expected to be domestic in nature. Therefore, although the total flow for the Site exceeds 10,000 L/day, no significant sewage disposal requirements are necessary as part of the assembly, manufacture, fabrication, repair, packaging and storage activities, which meets the requirements of a dry industrial use.

Similarly, the projected water demand for both concept A and B was calculated from the total daily design sewage flow and applicable MECP peaking factors. Based on the proposed occupancy type of the buildings, water usage is limited to use for domestic purposes and will not be required for any assembly, manufacturing, fabrication, repair, packaging or storage activities.

As demonstrated above, the proposed development does not involve water-intensive industrial operations and will be domestic in nature. Therefore, it is Crozier's opinion that the proposed use is consistent with the intent of the County Official Plan and the Zoning By-law definition of "Industrial Use, Dry." We note that this rationale is consistent with the approach that has been applied to similar dry industrial developments in the Township of Puslinch, including the development located at 7475 McLean Road.

We trust this satisfies your requirements. Should you have any questions or require any further information, please do not hesitate to contact the undersigned.

Sincerely,

C.F. CROZIER & ASSOCIATES INC.



Kyle Wetherall
Specialist, Private Services

KW/

C.F. CROZIER & ASSOCIATES INC.



Katherine Rentsch, P.Eng.
Manager, Private Services

c.c. Jordan Dyer, Fieldgate Properties Ltd.

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