

PLANNING OPINION REPORT

Official Plan & Zoning By-law Amendments
7331 & 7335 Wellington County Road 34
Puslinch, ON

Prepared For:

Shade Springs Inc.



September 2026

MGP

Official Plan & Zoning By-law Amendments

Planning Opinion Report

7331 & 7335 Wellington County Road
Puslinch, ON

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Contents

1.0 Planning Context 2
1.1 Introduction 2
1.2 Site Location 2
1.3 Surrounding Land Use 3
1.4 Puslinch By Design 4
2.0 The Proposed Development 6
2.1 Development Proposal 6
3.0 Development Considerations 7
3.1 Functional Servicing and Stormwater Management Report 7
3.2 Environmental Impact Assessment 7
3.3 Transportation Impact Study 8
3.4 Land Use Compatibility Study 9
3.5 Hydrogeology Investigation Report 10
3.6 Archaeological Assessment 11
3.7 Geotechnical Considerations Letter 12
4.0 Planning Policy Context 13
4.1 Planning Policy Considerations 13
4.1.1 Employment 13
4.1.2 Land Use Compatibility 15
4.1.3 Natural Heritage Matters 15
4.1.4 Mineral Aggregate Resources 16
4.1.5 Parkland Dedication Requirements 17
4.2 Policy Analysis 18
4.2.1 Provincial Planning Statement, 2024 18
4.3 Wellington County Official Plan 20
4.3.1 Growth Strategy 21
4.3.2 Rural Employment Areas 21
4.3.3 Greenlands System 22
4.3.4 Puslinch Local Policies 24

4.3.5 Urban Area Protection 24
4.3.6 Minimum Distance Separation Formula 25
4.3.7 Water and Sewage 25
4.3.8 Stormwater Management 25
4.3.9 Policy Area 7-10 26
4.3.10 Requirement for an Official Plan Amendment 30
4.4 Township of Puslinch Zoning By-law 023-18 30
4.4.1 Requirement for a Zoning By-law Amendment 31
5.0 Proposed Official Plan Amendment 32
5.1 Proposed Official Plan Amendment 32
5.2 Rationale for the Official Plan Amendment 32
6.0 Proposed Zoning By-law Amendment 35
6.1 Proposed Zoning By-law Amendment 35
6.2 Rationale for Zoning By-law Amendment 38
7.0 Planning Opinion 41
7.1 Statement of Conformity with Policy Documents 41
7.2 Conclusion 41

Figures

Figure 1.1: Subject Lands 3
Figure 1.2: Surrounding Context 4
Figure 4.1: Schedule B7 of the County of Wellington Official Plan 21
Figure 4.2: Township of Puslinch Zoning By-law 023-18 31

Executive Summary

Malone Given Parsons Ltd. represents Shade Springs Inc., the owners of 7331 and 7335 Wellington County Road 34 (the "Subject Lands") in the Township of Puslinch. The Subject Lands total approximately 40.2 hectares (99.4 acres) in size and are located on the east side of Concession Road 7 and the south side of Wellington Road 34. The surrounding area is made up of agricultural uses, rural residential development as well as an aggregates operation to the south.

The purpose of this report is to provide a planning opinion with respect to the proposed development for a dry industrial facility. This proposal requires applications for Official Plan Amendment and Zoning By-law Amendment. This Planning Opinion Report is prepared in support of the submission of these applications. The proposed redevelopment will also require a future site plan application prior to development.

The proposed development consists of a large-format dry industrial building (142,918 m^2 of GFA) positioned on the eastern half of the Subject Lands, with access from Wellington Road 34. Supporting infrastructure includes a wastewater treatment plant and stormwater management pond located on the western portion of the site. The natural heritage area along the western boundary is retained and protected as part of the proposal. A buffer is also provided to the woodland on the east side of the Subject Lands to ensure its protection. The proposed development provides an opportunity for job creation and economic investment in the Township of Puslinch, which takes advantage of the Subject Lands proximity to Highways 6 and 401, while ensuring the natural heritage features are protected.

The Subject Lands are designated Secondary Agricultural, Greenlands, and Core Greenlands under the Wellington County Official Plan. However, the recently adopted OPA 131 (and currently under review by the Ministry of Municipal Affairs and Housing), redesignates the Secondary Agricultural portion of the Subject Lands to Rural Employment Area. The proposed OPA implements this adopted policy direction in advance of OPA 131's Provincial approval and implements site-specific provisions. The proposed Zoning By-law Amendment rezones the Subject Lands to Industrial to facilitate the industrial use and provide site-specific exceptions.

In my opinion, the proposed Official Plan Amendment and Zoning By-law Amendment are consistent with, and conform to the applicable Provincial, County, and municipal planning policies. The proposed use and development standards are appropriate, contemplate compatible development of lands intended to be used for this purpose, and represent good planning and are in the public interest.

1.0
Planning Context

Shade Springs Inc. is proposing an Official Plan Amendment and a Zoning By-law Amendment to permit the development of the Subject Lands in the Township of Puslinch. This section describes the Subject Lands and the surrounding land use and development context.

1.1 Introduction

Malone Given Parsons Ltd. are the land use planners for Shade Springs Inc., the owner of 7331 and 7335 Wellington County Road 34 (the "Subject Lands") in the Township of Puslinch.

Shade Springs Inc. is proposing to develop the Subject Lands with a dry industrial facility consisting of an industrial use building, wastewater treatment plant, and a stormwater management pond. The proposed development will contribute to the supply of industrial space available in the Township. A detailed description of the proposed development is provided in Section 2.0 of this report.

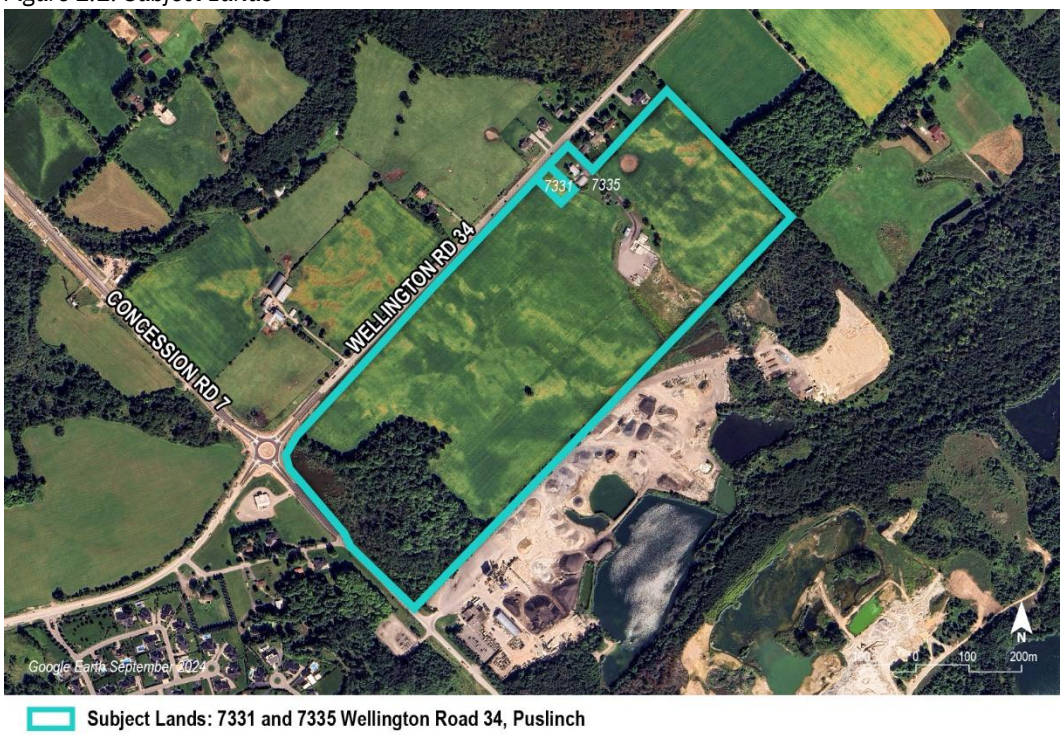
The Planning Opinion Report is submitted to accompany the following application:

- An Official Plan Amendment ("OPA") to the County of Wellington Official Plan to redesignate the Subject Lands to reflect the adopted OPA 131 land use designation and add site-specific policies.
- A Zoning By-law Amendment ("ZBA") to the Township of Puslinch Zoning By-law 023-18 to rezone the Subject Lands to implement the permissions of the proposed designation and add site-specific exceptions.

1.2 Site Location

The Subject Lands are comprised of two parcels totalling approximately 40.2 hectares (99.4 acres) in area, with frontage on Wellington County Road 34 (810 m) and Concession 7 (370 m). The Subject Lands currently contain one single detached dwelling and several structures related to farming at 7335 Wellington County Road 34. The 7331 Wellington County Road 34 and the remainder of 7335 Wellington County Road 34 are currently in active agricultural use.

Figure 1.1: Subject Lands



Source: Google Earth (2024), MGP (2026)

Table 1.1 Legal Description of Subject Lands

Municipal Address	Owner	Legal Description of Property	PIN	Area
7331 WELLINGTON ROAD 34	SHADE SPRINGS INC.	PT LOT 21, CONCESSION 7, TOWNSHIP OF PUSLINCH; PART 1, 61R3324; S/T IS12103 TOWNSHIP OF PUSLINCH	711960051	0.23 ha
7335 WELLINGTON ROAD 34	SHADE SPRINGS INC.	PART LOT 21 CONCESSION 7 PUSLINCH AS IN RO657310, EXCEPT PARTS 1, 2 & 3 PLAN 61R21010 AND PARTS 1, 2 & 3 EXPROPRIATION PLAN WC669212 TOWNSHIP OF PUSLINCH	711960287	40.05 ha

1.3 Surrounding Land Use

The Subject Lands are located within a rural area west of the Aberfoyle Urban Centre that is primarily made up of agricultural uses and rural residential uses.

The following summarizes the uses immediately adjacent to the Subject Lands:

To the North:
Agricultural uses (redesignated to Rural Employment Area under adopted OPA 131), rural residential, natural heritage area

To the South:
Capital Paving Inc., natural heritage area

To the East:
Agricultural uses, natural heritage area

To the West:
Rural commercial, rural residential, natural heritage area

The Subject Lands are also with close proximity to Highways 6 and 401, as demonstrated in the figure below.

Figure 1.2: Surrounding Context



Source: Google Earth (2024), MGP (2026)

1.4 Puslinch By Design

The Puslinch By Design Study was undertaken through a partnership between the Township of Puslinch and the County of Wellington to identify additional opportunities for employment lands in Puslinch to accommodate the identified employment land need. The County's Official Plan Review work identified a need for a minimum of 30 hectares of additional employment lands in the Township over the long term.

To implement the recommendations of the Puslinch By Design Study, Wellington County prepared a draft Official Plan Amendment ("OPA 131") which redesignates the Subject Lands to Rural Employment Area, subject to Policy Area PA7-10.

As per the Puslinch Special Council Meeting on July 23, 2025, Puslinch Council endorsed the draft OPA 131, subject to revisions to designate additional lands for Rural Employment purposes. The County adopted the revised OPA 131 on April 30, 2026. As the timeline for the approval of OPA 131 from the Ministry of Municipal Affairs and Housing is unclear, an Official Plan Amendment application is being submitted to implement the proposed Rural Employment Area designation in advance of that approval. The proposed Zoning By-law Amendment application is intended to implement the Rural Employment Area designation through a rezoning to the Industrial zone.

A detailed review of the proposed development's conformity with OPA 131 is provided in Section 4.3 of this Report.

2.0
The Proposed Development

This section provides an overview of the proposed development on the Subject Lands.

2.1 Development Proposal

The proposed development consists of a new dry industrial facility located at 7331 and 7335 Wellington County Road 34 in the Township of Puslinch. The development includes a large-format industrial building (142,918 m^2 of GFA) primarily positioned on the eastern half of the site, with access provided from two access points on Wellington Road 34. A potential future third access is located between the two proposed access points.

The building will serve as the primary structure on the property and has been designed to potentially accommodate two tenants. The proposed building is 14.89 metres in height and contains 229 truck-level doors and 4 drive-in doors.

Building setbacks range from 42.10 metres to 385.90 metres. Setbacks of at least 52.92 metres are provided to the adjacent rural residential uses, providing a sufficient separation distance to the more sensitive uses.

Supporting infrastructure is planned to accommodate the facility's operations, including a sewage disposal area (1.98 hectares) and a stormwater management ("SWM") pond area (3.55 hectares) located on the western side of the Subject Lands. The natural heritage areas along the western boundary (7.67 hectares) and in the southeast corner (0.15 hectares) are to be retained and protected as part of the design.

Approximately 25% of the total site area, excluding the natural heritage area, is proposed to be landscaped open space. This will ensure that appropriate buffering and screening are provided to the public realm and adjacent properties.

The site plan also illustrates surface parking areas, including dedicated trailer parking and employee parking, with access and circulation designed to support the industrial use. 756 car parking spaces, including 23 accessible parking spaces are provided in the surface parking areas as well as 255 trailer parking spaces and 288 bicycle parking spaces.

3.0
Development Considerations

This section provides a summary of the technical studies completed for the proposed redevelopment.

The following section provides a brief overview of the studies that have been prepared in support of the proposed redevelopment. Reference to the original studies should be made for full details.

3.1 Functional Servicing and Stormwater Management Report

Urbtech Engineering Inc. prepared a Functional Servicing & Stormwater Management Report ("FSSR"), dated July 15, 2026. The purpose of the FSSR is to demonstrate how the proposed development will be serviced and will address stormwater management in according with the guidelines and requirements of the Township of Puslinch and MECP.

The FSSR concludes the following:

- The stormwater Management will be addressed via the Proposed Wet Pond; with the Water Quality enhanced 80% long-term TSS removal. Erosion Control, detention of 25mm storm event for 48 hours. Quantity, to control the post-development flows to the existing 500mm diameter storm capacity at inlet control with an additional storage allowance of 15% for climate change with the use of the City of Guelph IDF in the SWMHYMO model with 4hr Chicago.
- Erosion and sediment control during construction will be provided via sediment fence, rock check dams in the exiting ditches and construction mud mat.
- A sewage system consisting of a septic tanks and dispersal area will be designed at the Site Plan stage and submitted to MECP.
- The Domestic Water supply will be delivered from the site well. The design will be provided at the Site Plan stage.
- The fire water supply will be provided via underground storage tanks and dry hydrants; the detailed design will be provided at the Site Plan stage.

3.2 Environmental Impact Assessment

Beacon Environmental Limited prepared an Environmental Impact Assessment ("EIA"), dated September 15, 2026. The purpose of this Assessment is to identify and

characterize the natural heritage features on the Subject Lands, evaluate their ecological function and significance, identifies natural heritage constraints and development limits, assess impacts of the proposed development on these features, and recommends mitigation measure to avoid or minimize impacts.

The EIA concludes that the Subject Lands contain a Significant Woodland on the west side and adjacent to the eastern property boundary, as well as a Significant Wetland, fish habitat, Potential Significant Wildlife Habitat (Bat Maternity Colonies, Reptile Hibernaculum, and Amphibian Breeding Habitat) within the woodlands on the west side and Significant Wildlife Habitat (Eastern Wood-pewee Habitat) within the woodlands on the east side.

The EIA recommends the following mitigation measures:

- Protective buffers of 10 metres from the significant woodlands and 30 metres from the wetlands.
- Native species that will complement the existing vegetation communities and provide wildlife habitat functions should be used for the buffers.
- A restoration area within the sewage treatment block should be established using a native seed mix comprised of species compatible with the adjacent woodland and wetland communities.
- An erosion and sediment control plan should be developed and implemented, and grading or site alteration actives should, where possible, be confined to the established limit of development.
- Vegetation clearing should not interfere with breeding bird activity or bat roosting.

The EIA concludes that the proposed development conforms to applicable environmental policies and regulations and will not adversely affect the natural heritage features and ecological functions associated with the subject property provided that the mitigation measures identified in the EIA are implemented.

3.3 Transportation Impact Study

Paradigm Transportation Solutions Limited prepared a Transportation Impact Study, dated August 2026. The purpose of the TIS was to provide an analysis of existing traffic conditions, a description of the proposed development, an access and circulation review, traffic forecasts for five years after the full build-out, and any recommendations required to manage future traffic conditions.

The TIS concluded that:

- Existing Traffic Conditions: The roundabout at Wellington Road 34 and Concession Road 7 is currently operating within acceptable levels of service with no critical movements during the AM and PM peak hours.
- Development Trip Generation: The development is forecast to generate approximately 185 and 231 trips during the AM and PM peak hours, respectively

for all vehicles. The site trip generation is also inclusive of 31 heavy vehicle trips during both the AM and PM peak hours.

- Sight Distance Assessment: Sightlines have been reviewed along Wellington Road 34 to determine appropriate locations for the accesses. Overall, the proposed locations of all site access connections would satisfy the applicable sight distance requirements. Adjustments would be required for the Eastern Access to ensure appropriate operation and accommodate a combination truck/tractor trailer.
- Site Circulation Review: All design vehicles can generally navigate through their intended areas of the site without any geometric conflicts. Although, conflicts with the WB-20 tractor trailer are noted at both site access locations and at some onsite trailer parking spaces. The identified conflicts with the WB-20 tractor trailer can be resolved by increasing the right radius on both sides of the driveways, adding exclusive right-turn lanes along Wellington Road 34, and using a shunting/spotter truck for on-site trailer parking.
- Background Traffic Conditions: The roundabout of Wellington Road 34 and Concession Road 7 is forecast to operate at acceptable levels of service with no critical movements during the AM and PM peak hours.
- Total Traffic Conditions: The study area intersections are forecast to operate at acceptable levels of service with no critical movements during the AM and PM peak hours.
- Left-Turn Lanes: Westbound left-turn lanes are not warranted along Wellington Road 34 at both site access locations.
- Right-Turn Lanes: Eastbound right-turn lanes along Wellington Road 34 at both site access locations should be reviewed to help prevent situations where a combination truck/tractor trailer uses the oncoming travel lane along Wellington Road 34 when completing a right-turn movement into the site.

3.4 Land Use Compatibility Study

Dillon Consulting Limited prepared a Land Use Compatibility Study, dated August 2026. The purpose of this Study is to assess the compatibility of the proposed development with surrounding sensitive uses with respect to noise, vibration, and air quality and provides mitigation recommendations.

The noise impacts from the proposed development were assessed through modelling of stationary sources in Cadna/A using ISO:9613 standards, based on the assumed operations of the proposed development at the current design stage, the Study recommends the following mitigation measures to achieve compliance with the MECP's sound level limits and ensure compatibility with the surrounding sensitive land uses:

- A 5.0-metre-high. 340-metre-long acoustic barrier, and a 4.5-metre-high, 285-metre-long acoustic barrier should be constructed to reduce exposure to stationary noise sources.
- Employ low-noise shunters instead of trucks for trailer shunting.
- Employ a limited shunting area directly adjacent to the northern driveway.
- Employ a truck anti-idling policy across the site.

- Prohibit trucking, shunting, and loading activities during the nighttime period.

The air quality impacts were assessed based on assumed operations, source locations, and source parameters. The Study concludes that it is not likely that the emission sources will significantly contribute to air quality, odour, or dust impacts at nearby sensitive land uses, subject to the implementation of the mitigation recommendations. The Study recommends:

- The creation of a provision to compete regular cleanings of paved areas to control emissions of fugitive dust.
- On-site signage notifying truck operators of an anti-idling program and 10 km/hr speed limit.
- Covering outdoor waste bins at all times and emptying outdoor waste bins regularly.

The Study concludes that the recommended mitigation measures are predicted to minimize off-site adverse effects and allow the proposed development to meet all Provincial compliance limits at the surrounding sensitive uses and as a result, a reduced setback is appropriate.

3.5 Hydrogeology Investigation Report

C.F. Crozier & Associates Inc. prepared a Hydrogeology Investigation Report, dated August 2026. The purpose of the Report is to outline the existing hydrogeological conditions and provide preliminary recommendations for management of groundwater during construction, water supply, and mitigation post-development.

The Report provides the following recommendations regarding water quality and quantity for the proposed development:

- Onsite grading should consider the well such that surface water runoff is not directed to or is able to pond around the well. Any storage of gasoline, chemicals, paints, domestic de-icing agents, and other contaminants should be contained and stored away from the wellhead.
- The well must be constructed in accordance with the Ontario Regulation 903 at a minimum and consider all local regulations. The well must be constructed upgradient from any proposed onsite private sewage systems and be sited following all setbacks outlined in the Ontario Building Code.
- For educational purposes on well ownership, the Owner should refer to the MECP's Water Supply Wells: Requirements and the local health unit for resources. Additional resources for the Owner can be accessed through the Walkerton Clean Water Centre, Green Communities Canada and the Government of Canada website.
- It is recommended that the onsite well be pumped, disinfected and tested following approval to inform the design of any water treatment system.

- The Owner should follow the regulatory well maintenance requirements as outlined in the MECP's Water Supply Wells: Requirements and Best Practices. The well must be accessible for maintenance purposes permanently.
- It is recommended that any new well water be tested on roughly an annual basis for bacterial parameters. Public Health Ontario offers free well water testing for E.Coli and total coliforms bacteria through the local Health Unit. Additional water quality testing for the full suite of potable water testing parameters should occur on a biannual basis.

3.6 Archaeological Assessment

Archaeological Consultants Canada prepared a Stage 1 & 2 Archaeological Assessment, dated December 23, 2025. The purpose of the Stage 1 Assessment is to provide information about the Subject Lands' geography, history, previous archaeological fieldwork, and current land conditions. The Stage 1 Assessment also evaluates the Subject Lands' archaeological potential in order to recommend appropriate strategies for the Stage 2 survey. The purpose of the Stage 2 Assessment is to document all archaeological resources present on the property and to make a determination about whether these resources, if present, have Cultural Heritage Value or Interest (CHVI).

Stage 1 background research indicated that the Subject Lands have general archaeological potential due to the following factors:

- The subject property is largely comprised of well-drained land that is suitable for human habitation.
- One farmstead is shown within the subject property in 1877 historical mapping.
- The subject property is located adjacent to two early historical transportation routes, Wellington Road 34 to the north and Concession Road 7 to the west.
- Aberfoyle Creek is located 350 m from the subject property.
- There are 15 registered archaeological sites within one km of the subject property.

38.2 hectares of the Subject Lands were determined to retain archaeological potential and were recommended for Stage 2 assessment. The Stage 2 Assessment provided the following recommendations:

- The Indigenous findspot identified as location P1 in this report does not meet the criteria for requiring Stage 3 assessment listed in MCM's 2011 Standards and Guidelines for Consultant Archaeologists. Location P1 has no further CHVI, and no additional fieldwork or assessment is recommended for this site.
- The Indigenous findspot identified as location P2 in this report does not meet the criteria for requiring Stage 3 assessment listed in MCM's 2011 Standards and Guidelines for Consultant Archaeologists. Location P2 has no further CHVI, and

no additional fieldwork or assessment is recommended for this site.

- The Subject Lands have now been fully assessed according to MCM's 2011 *Standards and Guidelines for Consultant Archaeologists*. No further archaeological assessment of the property is required.

3.7 Geotechnical Considerations Letter

Soil-Mat Engineers & Consultants Ltd. prepared a Geotechnical Considerations Letter, dated August 21, 2026. The purpose of this Letter is to assess the Subject Lands as an aggregate resource property.

The Letter concludes that the subsurface soils were found to consist of predominantly silty sand/sandy silt deposits, generally fine grained with occasional coarser seams, trace to some gravel, and inclusions of cobbles. The Letter further concludes that on a geotechnical basis, it is not clear that the silty sand soils have sufficient gravel fraction, or cobbles, to present as a quality sand and gravel resource. The Subject Lands have a borderline potential for quality aggregate resource, based on the presently available information.

4.0
Planning Policy Context

Pertinent policies addressed herein relate to employment lands, compatibility with surrounding uses, natural heritage, mineral aggregate resources, and parkland dedication requirements.

This section of the report provides an analysis of the proposed development on the Subject Lands in the context of the following Provincial, County, and Municipal documents:

- Provincial Planning Statement (2024) ("PPS 2024");
- Wellington County Official Plan (December 2025 Consolidation); and,
- Township of Puslinch Zoning By-law 023/18.

4.1 Planning Policy Considerations

This section analyzes consistency and conformity of the proposed development with regard to major planning matters and the related policies that require specific attention and explanation. The following section addresses matters such as employment lands, compatibility with surrounding uses, the preservation of the natural heritage features, mineral aggregate resources and parkland dedication requirements. Other applicable policies within Provincial, County, and Township planning documents have been reviewed, and we have concluded that the proposed development is consistent with or conforms to these policies. Further discussion and overall opinions are provided in the following sections.

4.1.1 Employment

The PPS 2024 provides policy direction on planning for economic development and employment lands. In particular, Policy 2.8.1.1 requires planning authorities to promote economic development and competitiveness by providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs, providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses, and identifying strategic sites for investment. Employment areas shall be planned for, protected, and preserved, particularly in proximity to major goods movement facilities and corridors (Policies 2.8.2.1 and 2.8.2.2).

Similarly, the County requires that sufficient land is designated and available to accommodate an appropriate range and mix of employment opportunities to meet projected needs, including maintaining a range and choice of suitable sites of various sizes 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 (Policy 4.2.1). The County will also 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 (Policy 4.2.1).

The County will encourage a variety of employment opportunities in a variety of locations with opportunities for industrial, commercial, and recreation activities supported in appropriate locations (Policy 4.2.3). While the majority of opportunities will occur in primary urban centres where full municipal services are available, other locations, including lands in the Rural System, will be considered where they offer advantages to business such as larger sites, compatibility or proximity to resources or major transportation facilities (Policy 4.2.3).

The main employment generator in the rural system will be resource-based industries such as agriculture, aggregate operations and forestry (Policy 4.2.5). However, the Rural System can also contribute sites for employment based on the ability to provide larger lots, larger buffers for compatibility, proximity to rural resources or access to major roads and the applicable policies of this plan will be used in locating employment lands to minimize the impacts on prime agricultural areas or mineral aggregate areas (Policy 4.2.5).

The proposed redesignation of the Subject Lands to Rural Employment Area and rezoning to Industrial is consistent with and conforms to the above policy framework. The Township of Puslinch currently has approximately 4 hectares of industrial land within its urban area. Through OPA 131, the County is bringing forward approximately 153 hectares of Rural Employment Area lands to diversify and expand the County’s employment land base, including within the Township and to address the identified need for additional employment land, which was confirmed through the Puslinch By Design Study. The Study emphasized the importance of protecting and leveraging key highway-adjacent parcels for high-profile business and light industrial development, while securing rural lands for employment growth.

The Subject Lands are among the lands being designated as rural employment through OPA 131 and represent an opportunity to provide a large-format dry industrial use, a use type requiring significant land area, rural servicing levels, and proximity to major transportation infrastructure, where there are limited suitable sites in the Township. The proposed applications implement the County's intent to support employment uses on the Subject Lands, as demonstrated by its adoption of OPA 131.

The Subject Lands contribute to the Township's employment land supply by providing a large-format site capable of accommodating dry industrial uses, a use type that requires significant land area, rural servicing levels, and proximity to major transportation

infrastructure (Highway 6 and 401), and for which suitable sites are limited in the Township. The proposed redesignation and rezoning ensure that sufficient land is available to accommodate employment needs in the near term.

The Subject Lands are not prime agricultural lands and are located in proximity to major transportation facilities, including Highways 6 and 401, making them an appropriate location for industrial employment uses in the Rural System. The proposed dry industrial use is compatible with the surrounding land uses as appropriate buffering is provided to the adjacent rural residential uses, a high level of landscaping will be integrated into the design, and it complies with the Minimum Distance Separation ("MDS") formulae and MECP D-6 Guidelines. This is confirmed by the County's decision to redesignate the Subject Lands to Rural Employment Area through the adoption of OPA 131.

4.1.2 Land Use Compatibility

The PPS 2024 requires planning authorities to address land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses (Policy 2.8.1.1 e)). Planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with Policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas (Policy 2.8.2.4). Development on lands within 300 metres of employment areas, major facilities, and sensitive land uses shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned employment areas as well as any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety (Policies 2.8.1.3 and 3.5.1).

The proposed development has been designed to ensure compatibility with the surrounding rural residential uses. The proposed dry industrial use is a Class II facility under the MECP D-6 Guidelines, which recommends a minimum 70-metre separation distance from sensitive land uses. Appropriate buffering, landscaping, and screening are proposed to minimize impacts on adjacent properties. A Land Use Compatibility Study, prepared by Dillon Consulting, has been submitted concurrently in support of the applications and confirms that the proposed development is compatible with the surrounding land uses. In particular, the Land Use Compatibility Study concludes that with the proposed mitigation measures in place, the reduced setback is appropriate.

4.1.3 Natural Heritage Matters

The PPS 2024 provides policy direction on matters of natural heritage features and systems. Section 4.1.1 states that "[n]atural features and areas shall be protected for the long term," while Section 4.1.2 emphasizes that "the diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved." These policies establish the framework for preserving and enhancing natural systems within the development context. Development and site alteration shall not be permitted on lands

adjacent to the natural heritage features identified in Policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions (Policy 4.1.8).

At the County level, the Greenlands System is intended to be maintained or enhanced. In particular, the diversity and connectivity of natural features and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkage between and among natural heritage features and areas, surface water features and ground water features (Section 5.3. Activities which diminish or degrade the essential functions of the Greenlands System will be prohibited. Activities which maintain, restore or, where possible, enhance the health of the Greenlands System will be encouraged where reasonable (Section 5.3). Where development is proposed in the Greenlands System or on adjacent lands, an Environmental Impact Assessment is required to ensure the policies of the Plan are met (Section 5.6.2). The Core Greenlands designation includes Provincially significant wetlands, all other wetlands, habitat of endangered or threatened species and fish habitat, and hazardous lands (Section 5.4). The Greenlands designation is comprised of other significant natural heritage features including habitat, areas of natural and scientific interest, streams and valleylands, woodlands, environmentally sensitive areas, ponds, lakes and reservoirs, and natural links (Section 5.5).

A portion of the Subject Lands is designated as part of the County's Natural Heritage System, referred to as the Greenlands System under the Core Greenlands and Greenlands designations as shown on Schedule B7 of the County of Wellington Official Plan.

As identified in the Environmental Impact Assessment ("EIA") prepared by Beacon Environmental, the Subject Lands contain a Significant Woodland, a Significant Wetland, fish habitat, and Significant Wildlife Habitat. No development is proposed within the Core Greenlands or Greenlands designations. The proposed development has been designed to provide a 10-metre buffer from significant woodlands and a 30-metre buffer from wetlands, consistent with the recommendations of the EIA. The natural heritage system boundaries have been refined based on the findings of the EIA. The Core Greenlands and Greenlands designated lands will continue to be zoned Natural Environment (NE) to prohibit buildings, structures, and site alterations except as necessary for the management or maintenance of the natural environment, consistent with Section 5.6.4 of the WCOP.

In summary, it is our opinion that the proposed development is consistent with or conforms to the applicable natural heritage policies by protecting these areas for the long term.

4.1.4 Mineral Aggregate Resources

The PPS 2024 requires that mineral aggregate operations shall be protected from development and activities that would preclude or hinder their expansion or continued

use or which would be incompatible for reasons of public health, public safety or environmental impact (Policy 4.5.2.4).

The Subject Lands are partially subject to a Mineral Aggregate Resource Overlay as shown on Schedule D: Mineral Aggregate Resource Overlay. The overlay identifies areas of high potential for mineral aggregate extraction; however, it does not presume that all conditions are appropriate to allow extraction or processing of the resource to proceed (Policy 6.6.1).

As per Policy 6.6.2, in areas adjacent to or in the Mineral Aggregate Resource Overlay, development that would preclude or hinder new aggregate operations or access to the resource are only allowed if:

a) "*resource extraction use would not be feasible;*
b) *the proposed development serves a greater long term public interest; in this case, reasonable efforts should be made to use the resource wherever practical;*
c) *issues of public health, public safety and environmental impact are addressed*".

The proposed industrial use is compatible with the existing mineral aggregate operation to the south of the Subject Lands as it will not preclude or hinder its expansion or continued use. This is reinforced by the Puslinch By Design study which concluded that the Subject Lands would have a negligible impact on existing or planned aggregate resources should they be redesignated to Rural Employment Area.

Moreover, Soil-Mat Engineers & Consultants has prepared an analysis in a letter titled Geotechnical Considerations – Aggregate Resource Potential, dated August 21, 2026, which concludes that the Subject Lands are predominantly composed of silty sand and sandy silt soils with trace to some gravel and occasional cobbles, and have a borderline potential for quality aggregate resource, based on presently available information.

Existing licensed mineral aggregate operations will be protected from new uses which would preclude or hinder their expansion or continued use, or which would be incompatible due to public health, public safety or environmental concerns (Policy 6.6.3).

While the Subject Lands are adjacent to a Licensed Aggregate Operation (as per Appendix 2 of the WCOP), the proposed use is industrial and will not preclude or hinder its expansion or continued use. The permitted uses of the underlying designation remain permitted on lands within Mineral Aggregate Areas, while additional aggregate-related uses may be permitted through a rezoning (Policy 6.6.4).

The proposed rezoning will permit industrial uses in keeping with the underlying Rural Employment Area designation. No aggregate-related uses are proposed and as such, no related permissions are being sought.

4.1.5 Parkland Dedication Requirements

The *Planning Act* provides that the council of a local municipality may require the

conveyance of land for park or other public recreational purposes as a condition of development at a rate of 2 percent for commercial and industrial uses and 5 percent in all other cases (such as residential land uses).

The County of Wellington Official Plan requires lands dedicated for parkland to be suitable for use as municipal parkland and prioritizes lands adjacent to established parks, schools, stormwater management areas, and residential areas (Policy 13.12.2). As per Policy 13.12.3, cash-in-lieu of parkland may be required in the following circumstances:

a) "*where the amount of land to be dedicated is of insufficient size, in the opinion of council, to be useable for normal public recreational activities;*
b) *where an area is adequately served by municipal or other open space lands;*
c) *where a municipality wishes to combine the parkland dedications of a number of small developments to provide for a large park area;*
d) *in rural developments where parkland may not be needed."*

The Subject Lands are located in a rural area and are proposed to provide industrial uses. Given this context, parkland dedication will be satisfied through a cash-in-lieu payment, in accordance with the *Planning Act* and the policies of the County of Wellington Official Plan.

4.2 Policy Analysis

4.2.1 Provincial Planning Statement, 2024

The Provincial Planning Statement, 2024, was introduced on October 20th, 2024, and with it, a simplified and more locally responsive planning document for municipalities. The PPS 2024 replaces both the *Provincial Policy Statement*, 2020, and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe*, 2019.

The PPS 2024 is a streamlined province-wide land use planning policy framework that provides municipalities with the tools and flexibility they need to build more homes. The PPS 2024 enables municipalities to plan for and support development and increase the housing supply across the province; align development with infrastructure to build a strong and competitive economy that is investment-ready; foster the long-term viability of rural areas; and protect agricultural lands, the environment, public health, and safety. Under the *Planning Act*, planning decisions must be consistent with the policies of the PPS 2024.

Long-Term Planning

Policy 2.1.3 states that at the time of each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of 20-30 years and planning for employment areas may extend beyond this time horizon.

OPA 131 is an amendment that was adopted as part of Wellington County's Official Plan

Review project which is considered an official plan update under Section 26 of the *Planning Act*. OPA 131 redesignates the Subject Lands to *Rural Employment Area* which is consistent with Policy 2.1.3 as it ensures that sufficient employment lands will be accommodated in the next 30 years. The proposed redesignation and rezoning of the Subject Lands will further support Policy 2.1.3 by enabling job creation in the near term as these lands are intended for dry industrial use and do not require full municipal servicing. Other lands planned to be redesignated for employment uses can accommodate employment growth in the longer term.

Rural Areas in Municipalities

Policy 2.5.1 requires that healthy, integrated and viable rural areas be supported by, among other things, promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources, and by using rural infrastructure and public service facilities efficiently.

The proposed development contributes to the diversification of the economic base in the Township of Puslinch by providing a large-format dry industrial employment use in a rural location well-suited to accommodate this type of development. The proposed use is consistent with rural service levels, relying on a private water supply and septic system rather than full municipal servicing, and utilizes existing road infrastructure provided by Wellington Road 34 and its proximity to Highways 6 and 401.

Rural Lands in Municipalities

Policy 2.6.1 sets out the permitted uses on rural lands in municipalities, including other rural land uses. The Subject Lands are proposed to be designated Rural Employment Area and are within an Employment Area, which permits the proposed industrial use consistent with this policy.

Development that can be sustained by rural service levels should be promoted (Policy 2.6.2). Development shall be appropriate to the infrastructure which is planned or available and avoid the need for the uneconomical expansion of this infrastructure (Policy 2.6.3).

The proposed industrial use will be a ‘dry’ use recognizing the limited water available to sustain the proposed development and the lack of sanitary sewer infrastructure available to the Subject Lands. A septic system and water system are proposed to provide appropriate servicing that avoids the uneconomical expansion of municipal infrastructure. The FSR provides a description of the proposed water and septic systems, with additional details to be provided at the Site Plan stage.

Planning authorities should support a diversified rural economy by protecting agricultural and other resource-related uses and directing non-related development to areas where it will minimize constraints on these uses (Policy 2.6.5).

Puslinch By Design assessed the Subject Lands' impact on agricultural and aggregate extraction uses and determined that the Subject Lands minimize constraints on these uses compared to several of the other options.

New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae (Policy 2.6.5).

While the Puslinch By Design Study identifies MDS constraints impacting portions of the Subject Lands, Wellington County Planning Committee Report PD2025-24, dated September 11, 2025, clarifies that there are no MDS encroachments on the Subject Lands. The Agriculture Background Paper prepared as part of Puslinch By Design applied Type B land uses for the MDS I calculations as a worst-case scenario. The Ministry of Agriculture, Food and Agribusiness has confirmed that as rural employment areas are limited to industrial uses outside a settlement area, a Type A land use would apply, as per MDS Guideline #33. As such, the proposed industrial land use complies with the MDS formulae.

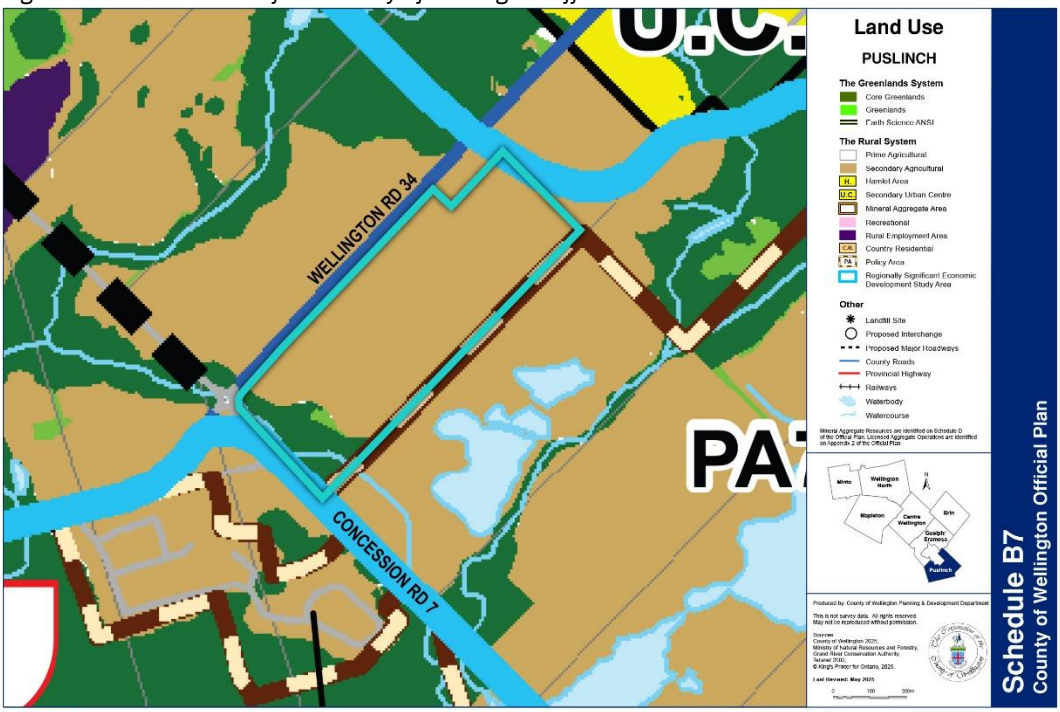
4.3 Wellington County Official Plan

The County of Wellington Official Plan ("WCOP") was adopted by Wellington County Council on September 24, 1998, approved by the Ministry of Municipal Affairs on April 13, 1999, and came into effect on May 6, 1999. The latest consolidation of the WCOP is dated December 2025.

The WCOP is intended to give direction over 20 years, to the physical development of the County, its local municipalities, and to the long-term protection of County resources. The Wellington County Official Plan enshrines the concepts of sustainable development, land stewardship, and healthy communities as part of the fundamental beliefs that underpin the directions of the plan. Per the WCOP, all land use and servicing decisions must conform to the policies of this plan.

The County is in the process of updating the WCOP. As part of this update, four Official Plan Amendments have been approved (OPA Nos. 119, 120, 123, and 126). As discussed in Section 1.4, OPA 131 has been adopted by County Council and is under review by MMAH. The following assesses the Subject Lands against the applicable policies of the WCOP, as well as having regard to the proposed designations under OPA 131 (Rural Employment Area and PA7-10). It is noted that the Subject Lands are currently designated Secondary Agricultural (as shown below).

Figure 4.1: Schedule B7 of the County of Wellington Official Plan



Source: County of Wellington (2025), MGP (2026)

4.3.1 Growth Strategy

As per Table 1 of the WCOP, total employment in Wellington County is projected to grow from 43,00 jobs in 2021 to 70,000 jobs in 2051. Table 7 identifies the projected employment growth in the Township of Puslinch increasing from 5,800 jobs in 2021 to 7,900 jobs in 2051 (Section 3.5).

Based on the non-residential square footage estimates in the County's Development Charge Background Study, the proposed development could provide approximately 860 jobs, contributing to the Township and County's employment forecasts.

4.3.2 Rural Employment Areas

Rural Employment Areas are lands set aside for industrial and limited commercial uses which would benefit from a rural location due to the need for a relatively large site; the need for access to major transportation routes; or the need to be close to rural resources (Policy 6.8.1). As per Policy 6.8.1, in all cases, rural employment areas will be used by "dry" industrial and limited commercial uses which do not use significant amounts of water in their operation and which do not produce significant amounts of effluent, consistent with rural servicing levels which rely on private water and sewage systems. Rural Employment Areas are expected to provide diversity to Wellington's land supply for business.

Dry industrial and commercial uses requiring large lots, major road access or proximity to

rural resources are permitted in rural employment areas which may include the following industrial uses in addition to a range of commercial uses:

- manufacturing, processing, fabrication and assembly of raw materials;
- repair, servicing, distribution and storage of materials; and,
- accessory uses including the retail sale of products produced on-site may be allowed (Policy 6.8.2).

The proposed warehouse is a dry industrial use, that requires a large site and access to major roads like Highways 6 and 401. The Subject Lands are located in proximity to Highways 6 and 401, satisfying the locational criteria for the Rural Employment Area designation. Sites of this scale can be difficult to find and as such the proposed development will contribute to the diversity of land supply for business in the County.

Policy 6.8.3 requires that in establishing zones and considering rezoning applications, Councils ensure that existing and proposed uses are compatible, and that sensitive uses are adequately separated from industrial uses.

Landscaping and screening will be provided to minimize the impact of the proposed development on the surrounding area. The proposed development is consistent with the setbacks required by the Industrial Zone which is the zone that is intended to accommodate Rural Employment Areas. Setbacks ranging from approximately 53 metres to 78 metres are provided to the rural residential uses to the north and east of the Subject Lands. The Land Use Compatibility Study prepared by Dillon Consulting recommends prohibiting truck movement at night and concludes that with the recommended mitigation measures in place, the proposed setbacks are appropriate.

4.3.3 Greenlands System

The Greenlands System is made up of features and areas which are part of Wellington's natural heritage or areas in which natural or human-made conditions may pose a threat to public safety and include the following:

- wetlands
- environmentally sensitive areas
- streams and valley lands
- ponds, lakes and reservoirs
- areas of natural and scientific interest
- woodlands
- fish and wildlife habitat
- flood plains and hazardous lands
- threatened or endangered species (Section 5.1).

The Core Greenlands designation is comprised of areas with greater sensitivity or significance including:

- provincially significant wetlands;

- all other wetlands; habitat of endangered or threatened species and fish habitat; and
- hazardous lands (Section 5.4).

Other significant natural heritage features that are intended to be protection from development and site alteration which would have negative impacts are included in the Greenlands designation (Section 5.5).

As detailed in the EIA prepared by Beacon Environmental, the Subject Lands contain a Significant Woodland on the west side and adjacent to the eastern property boundary, as well as a Significant Wetland, fish habitat, Potential Significant Wildlife Habitat (Bat Maternity Colonies, Reptile Hibernaculum, and Amphibian Breeding Habitat) within the woodlands on the west side and Significant Wildlife Habitat (Eastern Wood-pewee Habitat) within the woodlands on the east side.

Development and site alteration is not permitted in provincially significant wetlands, and the appropriate Conservation Authority should be contacted when development is proposed in or adjacent to a wetland (Policy 5.4.1).

Development and site alteration are also not permitted in significant habitat of endangered or threatened species or in fish habitat except in accordance with provincial and federal requirements (Policy 5.4.2). Development or site alteration adjacent to significant habitat of endangered or threatened species shall require a satisfactory Environmental Impact Assessment that demonstrates there will be no negative impact on the significant habitat of endangered or threatened species or its ecological function and proponents will be directed to the federal or provincial agency that has jurisdiction over the species or habitat to be protected (Policy 5.4.2).

On the Subject Lands, adjacent lands are considered to be lands within 120 metres of provincially significant wetlands, provincially significant Life Science Areas of Natural and Scientific Interest, significant habitat of endangered and threatened species, fish habitat, significant wildlife habitat, significant valleylands, and significant woodlands and lands within 30 metres of all other Core Greenlands and Greenland areas (Policy 5.6.3 a) and c)).

As discussed in the EIA prepared by Beacon Environmental, the proposed development protects the environmental features on the Subject Lands by providing a 10-metre buffer from the woodlands and a 30-metre buffer from wetlands and as a result, there will be no negative impact on the environmental features and their functions. The applications will be circulated to the Conservation Authority through the development application process.

Lands designated Core Greenlands shall be placed in a restrictive zone which prohibits buildings, structures, and site alterations except as may be necessary for the management or maintenance of the natural environment, while other Greenlands may also be given restrictive zoning (Policy 5.6.4).

The Core Greenlands and Greenlands designated lands will continue to be zoned as

Natural Environment to ensure buildings, structures, and site alterations except as may be necessary for the management or maintenance of the natural environment are prohibited.

Minor adjustments to mapping identifying Core Greenlands and Greenlands may be made without an amendment to the WCOP where more detailed mapping is available (Policy 5.6.7). Where development or site alteration is proposed within a Conservation authority regulated area, the Conservation Authority should be consulted before development (Policy 5.6.8).

The EIS also proposes refinements to the Core Greenlands and Greenlands on the Subject Lands. The Conservation Authority will be included in the Township's agency circulation of the Zoning By-law Amendment application.

4.3.4 Puslinch Local Policies

Policy 9.8.3 a) of the WCOP permits commercial uses such as automotive uses, restaurants, motels, and limited retail as well as offices, including a head office and/or research centre within areas designated Rural Employment Area in Puslinch, however, it should be noted that the adopted OPA 131 prohibits most of these uses, in order to be consistent with the PPS 2024 and the Planning Act.

The proposed development is consistent with the main permitted uses in the Rural Employment Area designation as well as in OPA 131 and is not a use identified in Policy 9.8.3 a).

The Subject Lands are located within Puslinch's Regional Significant Economic Development Study Area as demonstrated on Schedules A-7 and B-7 (see Figure 4.1). This area includes Secondary Agricultural lands to be considered for future employment uses and as appropriate, other uses based on need which are compatible with the surrounding area (Policy 9.8.4). The Puslinch By Design Study proposed to redesignate the Subject Lands for employment uses. This redesignation will be implemented through the approval of OPA 131.

The proposed development provides an employment use consistent with the Rural Employment Area designation proposed by the Puslinch by Design Study.

4.3.5 Urban Area Protection

New development is prohibited adjacent to existing primary and secondary urban centres, hamlets, or cities unless part of an urban expansion (Policy 4.7.1 a)). Adjacent normally means within 1 kilometre of an urban area boundary (Policy 4.7.1 a)). However, Policy 4.7.1 further states that "*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*".

As the expansion of the Aberfoyle secondary urban centre is being contemplated in

tandem with the Subject Lands' redesignation to Rural Employment Area, development of the Subject Lands is not prohibited under this policy.

Further, in response to MGP's November 11, 2025 Comment Letter, County staff stated that "staff do not agree that site-specific policy provisions need to be added to address policy 4.7.1 (Distinct Urban-Rural Boundary)". Staff clearly do not have concerns regarding this policy impeding the development of the Subject Lands.

4.3.6 Minimum Distance Separation Formula

Within the Rural System, the appropriate provincial minimum distance separation formula will be applied to new land uses, lot creation, and new or expanding livestock facilities (Policy 6.4.9).

As per County of Wellington Committee Report PD2025-24, dated September 11, 2025, the Ministry of Agriculture, Food and Agribusiness has confirmed that as rural employment areas are limited to industrial uses outside a settlement area, a Type A land use would apply, as per MDS Guideline #33. The Committee Report states that "[a]s a result, Area G and H [the Subject Lands] no longer have MDS encroachments".

As such, the proposed industrial land use complies with the MDS formulae.

4.3.7 Water and Sewage

Development in the rural system is anticipated to be on individual on-site systems where soil conditions are suitable over the long term (Policy 11.2.6).

A septic system and private water system are proposed as part of the proposed development. Further details are provided in the FSR and the design of these systems will occur at the Site Plan stage.

4.3.8 Stormwater Management

Development and redevelopment in all watersheds shall incorporate storm water management to control runoff up to and including the 1:100-year design event or Regional Storm, whichever is greater. The level of storm water management to be achieved is to be determined through an assessment of watershed conditions and negotiations with the County, the local municipality and the Conservation Authority. Best management practices and storm water management techniques will be implemented in consultation with appropriate government agencies. (Policy 11.3.2).

A stormwater management pond is proposed on the Subject Lands. As noted in the Functional Servicing and Stormwater Management was prepared by Urbtech Engineering Inc., the post-development flows will be reduced substantially from the pre-development levels and the required storage increased by 25% for the 100-year storm.

As per Policy 11.3.4, a stormwater management report containing the following information may be required:

a) "*a plan for the provision of storm water drainage facilities to accommodate the proposed development;*
b) *a grading plan for the proposed development or to provide services to public service facilities. Additionally a Council may approve the extension of services to areas where development existed outside urban boundaries prior to the restructuring of the County on January 1, 1999 if council determines that the health or environmental benefits are significant;*
c) *an assessment of the pre-development and post-development discharge of water during flood conditions on any stream, watercourse or drainage works;*
d) *an assessment of the impacts of the proposed development on the water quality of any stream or watercourse, particularly in terms of water temperature, baseflow, and fisheries potential, and the means of mitigating any potential reductions in water quality and quantity;*
e) *an assessment of the storm water capacity of any proposed receiving stream, watercourse or drainage works;*
f) *the means of controlling erosion and sedimentation using the best available construction and management practices during and after the construction of the development;*
g) *an assessment of how development will maintain or enhance the minimum baseflow of a watercourse, and maintain storage levels during periods of minimum baseflow for flow augmentation;*
h) *the potential impact of the development and any proposed storm water management techniques on groundwater resources;*
i) *an investigation showing that feasibility of infiltration of storm water at or near the source*".

A stormwater management pond is proposed on the Subject Lands. A Functional Servicing and Stormwater Management was prepared by Urbtech Engineering Inc. in accordance with Policy 11.3.4 as it provides stormwater management plan and assessment, a grading plan, and an erosion and sediment control plan.

Policy 11.3.6 requires new development to incorporate a Major-Minor system concept, where appropriate. The Major system is designated to accommodate the 1:100 year or Regional Storm, whichever is greater and the Minor system is intended to accommodate runoff from more frequent storms (Policy 11.3.6).

The stormwater management plan incorporates a stormwater management pond as well as flows to an existing storm pipe, ensuring that runoff from the 100-year storm as well as more frequent storms can be accommodated.

4.3.9 Policy Area 7-10

Once OPA 131 is in effect, Policy Area 7-10 ("PA7-10") will apply to the lands generally located on the south side of Highway 401 and the east side of Concession 7, and on the north and south side of Wellington Road 34 and the east side of Concession 7/Wellington Road 54. These lands are considered a Prestige Rural Employment Area.

The Prestige Rural Employment Area lands are intended for high-quality industrial, business, and employment uses that require a well-designed setting while taking advantage of the proximity to major transportation infrastructure (Highway 401 and Wellington Road 34) (Policy PA7-10 a)). Prestige Rural Employment will have enhanced architectural and landscaping design standards with outdoor storage and parking limited to maintain a visually attractive environment and aesthetic appeal (Policy PA7-10 a)). In particular, outdoor storage and parking will not be permitted along the frontage of Highway 401 and Wellington Road 34 and loading areas are not permitted to face the Highway 401 and Wellington Road 34 frontages (Policy PA7-10 a)). Prestige Rural Employment Area lands will be used by "dry" uses which do not use significant amounts of water in their operation and which do not produce significant amounts of effluent, consistent with rural servicing levels which rely on private water and sewage systems (Policy PA7-10 a)).

The proposed development will accommodate a high-quality, dry industrial use with enhanced architectural and landscaping standards, consistent with the Prestige Rural Employment Area policies. An Official Plan Amendment is required to permit parking and loading along Wellington Road 34 as well as to establish an appropriate separation distance from sensitive uses.

Notwithstanding Section 6.8.2, the uses permitted in the PA7-10 area are limited to enclosed warehousing and distribution centres, corporate offices and headquarters accessory to a principle use, research and development facilities associated with manufacturing uses, light, medium, or high-tech manufacturing and processing operations deemed not to be noxious by reason of dust, odour, fumes, particulate matter, noise and excessive vibrations (Policy PA7-10 b)).

The proposed development is a warehousing and distribution centre, a use permitted within the PA7-10 area. As per Policy PA7-10 c), zoning provisions should address the following criteria:

Policy	Response
i. Land Use Compatibility: To ensure land use compatibility between industrial and sensitive land uses, a buffer area shall be established according to the following policies: • Where a proposed industrial use is located within 300 metres of a sensitive land use, or where a sensitive land use is proposed within 300 metres of an existing or planned industrial use, the Township shall apply Ministry of the Environment, Conservation and Parks (MECP) D6 Guidelines: Compatibility	A Land Use Compatibility Study has been prepared by Dillon Consulting and concludes that with the proposed mitigation measures, a reduced setback of 50.0 metres is appropriate and consistent with the D-6 Guidelines. This separation distance will be reflected in the proposed Zoning By-law Amendment.

Between Industrial Facilities and Sensitive Land Uses. • For Class I or Class II industrial facilities (as defined by MECP D-6 Guidelines), a Land Use Compatibility Study or equivalent technical assessments may be required to evaluate potential impacts such as noise, odour, dust, vibration, or emissions. Based on these findings of these studies, additional separation distances, buffering, or mitigation measures may be prescribed. All land use decisions shall be consistent with the D-6 Guidelines and any successor documents, as well as the cumulative impacts of surrounding land uses. No Class III industrial facilities are permitted.	
ii. Parcel sizes: The need for a range or parcel sizes to accommodate diverse business needs, with an emphasis placed on the provision of larger parcels to support industries requiring significant land area. Lot fabric and subdivision design shall address long-term flexibility and market trends in industrial land demand.	The Subject Lands are 40.2 hectares (27.2 net hectares) providing a large parcel to address the needs of industries requiring significant land area and meets the minimum lot area required by the Zoning By-law.
iii. Design guidelines: Where appropriate, design guidelines adopted by Township Council should be integrated as zoning requirements.	Design requirements relating to landscaping buffers and built form are set out in the Puslinch by Design Study however, most design guidelines are not appropriate to be included as zoning requirements. The proposed development has been designed to be generally consistent with the Highway 401 and Concession 7 Rural Employment Area Design Guidelines.
iv. Buffer areas: Incorporate enhanced landscaping setbacks, buffering and screening where employment area lands interface with rural residential land uses, rural residential clusters and/or sensitive land uses. A minimum 70 m setback shall be required from rural residential uses,	9-10-metre landscaping setbacks as well as fencing are proposed to provide buffering and screening adjacent to the rural residential land uses. As the required mitigation is predicted to minimize off-site adverse effects and allow the facility to meet all provincial compliance limits at

rural residential clusters and/or sensitive land uses. The setback may be greater than 70 m based on the recommendations within a land use compatibility assessment. The required setback shall be landscaped and/or contain natural self-sustaining vegetation in a manner that respects and sustains the rural character. This 70 m setback shall only be reduced through an Official Plan Amendment.	the surrounding sensitive uses, the Land Use Compatibility Study concludes that the Proposed Development satisfies the requirements of Guideline D-6 Section 4.1.3 and 4.5.1 and the proposed setback of 50 metres is appropriate. The Draft ZBA proposes a 50-metre setback.
v. Holding provisions: The policy area may be placed in an appropriate prestige industrial zoning category and shall be subject to a Holding (H) provision. Prior to the removal of the Holding provision, Township Council shall require the submission and approval of associated technical reports, studies and any additional information as deemed necessary by Township Council.	The appropriate technical reports are included with the Zoning By-law Amendment application. Should additional reports be required, they will be provided through the application process. As such, a Holding (H) provision is not required.
vi. Lot coverage: Maximum lot coverage should generally be in the range of 40%, to ensure adequate space for landscaping, stormwater management, and buffering.	The proposed development provides a lot coverage of approximately 44% of the developable area which is in the range of 40%. Additionally, the Industrial zone permits a maximum lot coverage of 75%. As the proposed lot coverage is consistent with the Zoning By-law, a SWM pond is provided, and landscaping and setback requirements will ensure there is appropriate buffering, no consideration of lot coverage is required in the Zoning By-law Amendment.

New development is encouraged to adhere to the area's design guidelines (Policy PA7-10 d)).

As part of Puslinch By Design, the Highway 401 and Concession 7 Rural Employment Area Design Guidelines were developed for the areas recommended to be redesignated as Rural Employment Area. On July 23, 2025, Puslinch Council amended the draft OPA 131 to also designate Options G and H (the Subject Lands) as Rural Employment. As part of the same resolution, Puslinch Council directed that Rural Employment Lands Design Guidelines be developed specifically for Options G and H (the Subject Lands) of Puslinch By Design.

As such, no design guidelines apply to the Subject Lands at this time. Regardless, the proposed development is being designed to achieve a high-quality built environment and to ensure appropriate interfaces and buffering between uses. Additional details regarding the design of the proposed development will be provided at the Site Plan stage.

In order to protect groundwater function and quality, future communal wells should not be Multiple Aquifer Penetrating (Policy PA7-10 e)). Communal wells are not proposed.

In all cases, the cost for road infrastructure owned by the County and/or Township for development in the Rural Employment Area will be borne by the developer (Policy PA7-10 f)).

As concluded by the Transportation Impact Study, no additional road infrastructure is required to support the proposed development.

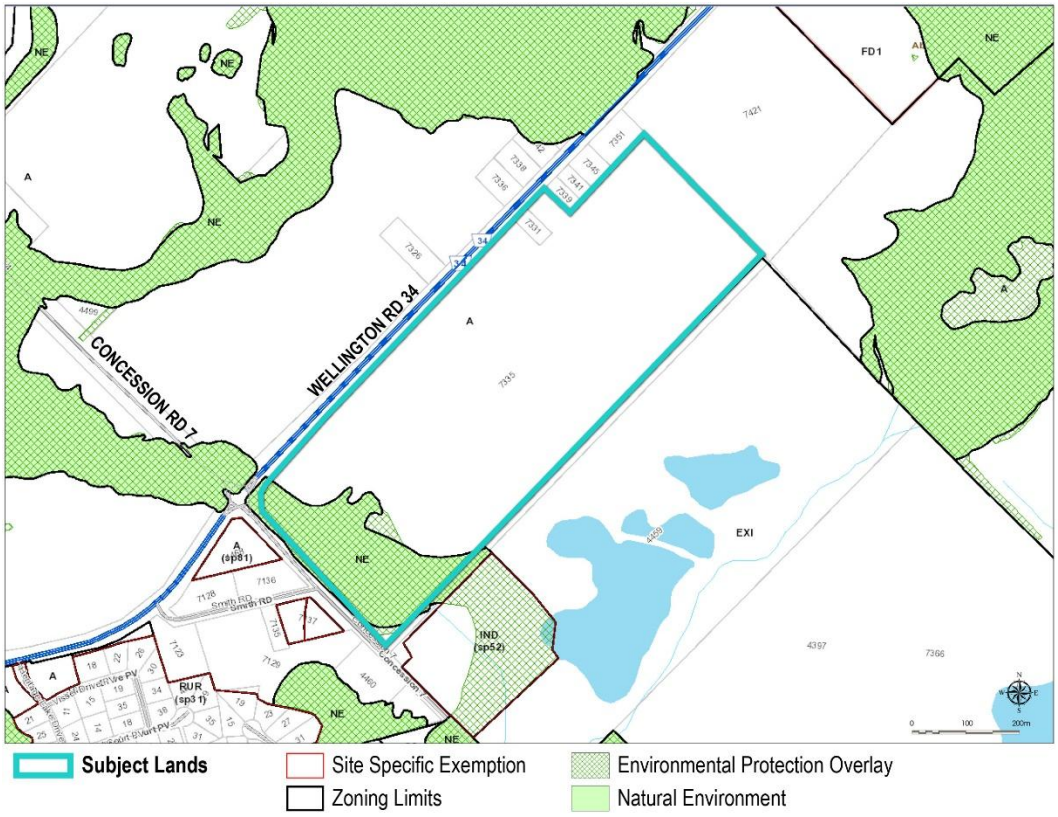
4.3.10 Requirement for an Official Plan Amendment

An Official Plan Amendment to the County of Wellington Official Plan is required to redesignate the Subject Lands to Rural Employment Area, in alignment with the adopted OPA 131 and to permit parking and loading along Wellington Road 34 as well as to establish an appropriate setback from sensitive uses. An overview and analysis of the requested amendment can be found in Section 5.0 of this report.

4.4 Township of Puslinch Zoning By-law 023-18

The Subject Lands are zoned Agricultural (A) and Natural Environment (NE) with an Environmental Protection Overlay (EP Overlay), under Township of Puslinch Zoning By-law 023-18, as shown in the figure below.

Figure 4.2: Township of Puslinch Zoning By-law 023-18



Source: Wellington County (2026), MGP (2026)

The Agricultural zone permits a range of uses, primarily related to agriculture and farming. Other permitted uses include bed and breakfasts, community gardens, conservation uses, daycare centres and private home day cares, single detached dwellings and additional residential units, group homes, home businesses, home industries, legally and existing institutional uses.

The Natural Environment zone permits agricultural uses, boat houses and boat docks, conservation uses, and public park with no buildings and structures.

The Environmental Protection Overlay represents natural heritage features included in the "Greenlands" designation of the County Official Plan, as well as lands to which the Grand River Conservation Authority Regulation 150/06 applies. The EP Overlay permits the development of the lands, subject to provisions regarding specific features.

No development is proposed within the Natural Environment zone or the EP Overlay.

4.4.1 Requirement for a Zoning By-law Amendment

An amendment to the Township's Zoning By-law 023-18, as amended, is required to rezone the Subject Lands to the Industrial (IND(spXX)) Exception Zone and Natural Environmental (NE) Zone and establish site-specific provisions. An overview and analysis of the requested amendment can be found in Section 6.0 of this report.

5.0
Proposed Official Plan Amendment

5.1 Proposed Official Plan Amendment

OPA 131 was adopted by Wellington County Council on April 30, 2026 and redesignates the Subject Lands to Rural Employment Area, Core Greenlands, and Greenlands. As the timeline for MMAH's approval of OPA 131 remains unclear, the proposed Draft Official Plan Amendment ("Draft OPA") implements this adopted designation in advance of provincial approval. In addition to the redesignation, the Draft OPA includes site-specific policies to address the unique characteristics of the proposed development on the Subject Lands and ensure that the proposed development can be realized in a manner that is appropriate and compatible with the surrounding area.

The County of Wellington Official Plan currently designates the Subject Lands as "Secondary Agricultural", "Core Greenlands", and "Greenlands". The Draft OPA seeks to redesignate the Secondary Agricultural portion of the Subject Lands to Rural Employment Area, consistent with OPA 131, and to establish site-specific policies as described below as well as to permit data centres. The Core Greenlands and Greenlands designations are generally not proposed to be amended.

A draft of the OPA is submitted as part of the application package.

5.2 Rationale for the Official Plan Amendment

It is our opinion that the proposed amendments are appropriate and represent good planning. The proposed development is consistent with the PPS 2024 and conforms with the Wellington County Official Plan, as proposed to be amended by:

- Contributing the available land to meet the forecasted employment need and ensure an adequate supply and range of employment land is available.
- Proposing a dry industrial use in a location that the County has identified for this type of use through OPA 131.
- Providing compatibility with surrounding uses through appropriate separation and screening.
- Diversifying the employment opportunities in the area to enhance the rural economic base.
- Protecting the natural heritage features on the Subject Lands.

Land Use Designation

The proposed Rural Employment Area designation is appropriate as it implements the designation proposed by the County through the adopted OPA 131.

Puslinch By Design concluded that Option H (the Subject Lands) were one of the best performing candidates for future employment growth based on the evaluation of all the land options. The Subject Lands' large size, proximity to highways, compliance with the MDS, and negligible impact on aggregate resources make them an appropriate location for rural employment uses, as further detailed in Puslinch By Design.

While we support the principal intent to redesignate these lands for rural employment uses, OPA 131 proposes additional policies that, in our opinion, are not appropriate in order to implement the vision for these lands, as further detailed below. As such, the Draft OPA proposes to modify these policies for this site.

Parking and Loading Along Wellington Road 34

The proposed policies of OPA 131 prohibit outdoor storage and loading areas along the Wellington Road 34 frontage, as well as limits parking. These restrictions are overly prescriptive for a rural employment context and risk limiting the functional layout and market viability of these lands.

Outdoor storage, including truck trailer parking and equipment staging, is a necessary and compatible accessory use for many employment uses, particularly warehousing and logistics operations. A prohibition does not reflect the operational realities of the uses these lands are intended to attract.

The proposed site-specific policy permits parking and loading along Wellington Road 34 so long as it is screened. This approach minimizes site layout constraints to ensure that rural employment uses are operationally feasible on the Subject Lands, while addressing visual impacts along Wellington Road 34 through landscape buffers, fencing, berms, and other screening measures.

Additionally, any development on the Subject Lands will be subject to site plan control which provides the appropriate mechanism to evaluate for addressing these elements on a site-by-site basis, taking into account the specific use, building orientation, and parcel configuration.

The proposed site-specific policy is appropriate as it maintains the intent of the OPA 131 policies by ensuring that visual impacts along Wellington Road 34 will be minimized.

Separation Distance

Under the site specific PA7-10 designation of OPA 131, there is a proposed policy that establishes a minimum 70-metre setback from rural residential uses and sensitive land uses, which can only be reduced through an Official Plan Amendment. This policy is overly

prescriptive and inconsistent with the land use compatibility framework already established in OPA 131. The PA7-10 site-specific policies already require the application of the Province's *D-Series Guidelines,* specifically *D-6: Compatibility Between Industrial Facilities and Sensitive Land Uses*, where a proposed industrial use is located within 300 metres of a sensitive land use.

The Land Use Compatibility Study prepared by Dillon Consulting concludes that with the specified mitigation measures in place, the actual area of influence is not anticipated to extend to the surrounding sensitive uses and that the off-site emissions are predicted to comply with all applicable Provincial criteria at all surrounding points of reception. The Land Use Compatibility Study clarifies that the 70-metre recommended minimum separation distance for Class II industrial facilities in the D-6 Guidelines is based on standard unmitigated operations.

As the required mitigation is predicted to minimize off-site adverse effects and allow the facility to meet all provincial compliance limits at the surrounding sensitive uses, the Land Use Compatibility Study concludes that the Proposed Development satisfies the requirements of Guideline D-6 Section 4.1.3 and 4.5.1 and the proposed reduced setback is appropriate.

In addition to the setback provided, buffering and screening are also proposed to minimize the proposed development’s impact on the adjacent residential uses.

The proposed site-specific policy is appropriate as it maintains the intent of the OPA 131 policy by ensuring sufficient separation distance is provided from sensitive uses.

6.0
Proposed Zoning By-law Amendment

6.1 Proposed Zoning By-law Amendment

The proposed Draft Zoning By-law Amendment ("Draft ZBA") seeks to rezone the Subject Lands to the Industrial (IND(spXX)) Exception Zone and Natural Environmental (NE) Zone to facilitate the proposed development and protect the natural features. The Draft ZBA is submitted as part of this application.

The IND Zone is a zoning category in the Township of Puslinch Zoning By-law that provides for and regulates dry industrial and limited commercial uses, typically on lands designated Rural Employment Area in the County Official Plan.

The following table provides an overview of the requested amendments.

Zoning By-law 023-18	Requested Amendment
Definitions Industrial Use, Dry 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 purpose of this definition, significant water requirements are defined as water use requiring a Permit	**Definitions** Industrial Use, Dry All permitted uses, including ancillary uses, are required to be 'dry' uses. For the purposes of this bylaw, significant water and sewage disposal requirements are water use requiring greater than 59,000 litres per day and sewage disposal systems that exceed 53,000 litres per day.

to Take Water and/or greater than 50,000 litres of water per day. d. For the purpose of this definition, significant sewage disposal requirements are defined as sewage disposal systems that exceed 10,000 litres per day of discharge. <u>Landscaped</u> an area of land that is the site of trees, shrubs, flowers, grass or other horticultural elements, decorative stonework, screening, or other architectural elements, and may include lands that are used as walkways that provide access onto the lot from the street, or as snow storage areas, all of which are designed to enhance the visual amenity of a property and does not include parking areas. <u>Lot Coverage</u> the total horizontal area of a lot covered by the first storey of all buildings and structures on the lot, but does not include open, unenclosed decks, unenclosed swimming pools, patios, and porches not exceeding three (3) metres in building height and not covered by a support roof structure. For the purpose of calculating lot coverage in accordance with the zone provisions of this By-law, the lot coverage of all accessory buildings and structures on the subject lot shall be included.	<u>Landscaped</u> Notwithstanding the definition of landscaped in Section 3.0, landscaped open space will be calculated using the lot area excluding the lands zoned Natural Environment. <u>Lot Coverage</u> Notwithstanding the definition of lot coverage in Section 3.0, lot coverage will be calculated using the lot area excluding the lands zoned Natural Environment.
Parking <u>Industrial Use</u> 1/100 m^2 for the first 10,000 m^2 of floor area and 1/200 m^2 for any floor area after the first 10,000 m^2. <u>Warehouse Use</u>	**Parking** The minimum parking rate for industrial and warehouse uses is 1 space per 250m^2 of net floor area.

1/200 m²	
Permitted Uses	**Permitted Uses** A Data Centre is a permitted use.
Setbacks from the Natural Environment Zone a. No buildings or structures, including a private sewage treatment system and associated tile weeping bed, shall be constructed closer than 30 metres from the limit of a Natural Environment (NE) Zone. b. Notwithstanding the required setback in subsection (a) above or any other provision in this By-law to the contrary: i. Accessory buildings or structures to existing residential dwelling units, enlargements of existing buildings or structures, or reconstruction of existing buildings or structures including improvements to manure storage systems associated with an existing livestock facility, shall be permitted on a lot adjacent to the NE Zone provided that a minimum setback of three (3) metres is maintained from the adjacent NE Zone boundary; and ii. Where a vacant lot existed on the day of passing of this By-law, a building permit may be issued for permitted buildings or structures, excluding new agricultural buildings and structures, provided that: 1) there is no other suitable location on the lot outside of the 30-metre minimum setback, and 2) a setback of at least three (3) metres from the NE Zone boundary is maintained. c. Notwithstanding the above, the setback from the Natural Environment (NE) Zone may be reduced to a distance that is supported by the Conservation Authority	**Setbacks from the Natural Environment Zone** The establishment of the NE zone for the adjacent land includes the natural heritage features and the associated buffer areas. Accordingly, the setback provisions of Section 4.31 do not apply.

having jurisdiction pursuant to its authority provided under the Conservation Authorities Act, R.S.O. 1990. Where the Conservation Authority provides written approval for a reduced setback from the NE Zone an amendment to this By-law shall not be required.	
Sensitive Uses Setback N/A	**Sensitive Uses Setback** The minimum setback from the adjacent rural residential properties is 50.0 metres.

6.2 Rationale for Zoning By-law Amendment

The Draft ZBA rezones the Subject Lands to permit the proposed dry industrial use and establish site-specific provisions in order to facilitate the proposed development. As demonstrated throughout this report, the proposed development is compatible with the surrounding community, consistent with the County and Township's vision for the Subject Lands and addresses the employment land need in the Township and the County.

The proposed site-specific standards are appropriate for the following reasons:

Dry Industrial Use Requirements

The Wellington County OP requires rural employment uses to be “dry” to be consistent with rural servicing levels which rely on private water and sewage systems. For the purposes of the dry industrial use definition, Puslinch Zoning By-law 023-18 identifies significant water requirements as water use requiring a Permit to Take Water and/or greater than 50,000 litres of water per day and significant sewage disposal requirements as sewage disposal systems that exceed 10,000 litres per day of discharge.

The intent of the dry use requirement is to ensure that new rural employment uses do not burden the surrounding municipal water and sewage systems by requiring private services appropriate to the scale of the property.

The Zoning By-law’s definition of significant water and sewage disposal requirements does not take property size into consideration. The Subject Lands are significantly larger than the standard properties contemplated by the Industrial zone given that the Industrial zone requires a minimum lot area of 0.4 hectares, while the Subject Lands are approximately 40.2 hectares. What is considered to be significant for the purposes of defining a “dry” industrial use should be scaled to the size of the property. The proposed ZBA establishes a threshold of 59,000 litres per day for sewage disposal and 53,000 litres per day for significant water use, which is proportionate to the size of the Subject Lands.

The proposed development will be serviced by private water and sewage systems as discussed in the FSSR prepared by Urbtech Engineering, and will not require the

municipal system, meeting the intent of the Wellington County OP and Puslinch Zoning By-law's intent. As such, the proposed increase in the threshold for significant water and sewage systems is appropriate for the Subject Lands.

Landscaped Open Space

Zoning By-law 023-18 does not specify which components of the lot area are to be used to calculate the landscaped open space. For clarity, the ZBA includes a provision that specifies that the lot area for the purposes of the landscaped open space calculation does not include the lands zoned Natural Environment.

Lot Coverage

Zoning By-law 023-18 does not specify which components of the lot area are to be used to calculate the lot coverage. For clarity, the ZBA includes a provision that specifies that the lot area for the purposes of the lot coverage calculation does not include the lands zoned Natural Environment.

Parking

Zoning By-law 023-18 sets the minimum parking for an industrial use as 1/100 m² for the first 10,000 m² of floor area and 1/200 m² for any floor area after the first 10,000 m² and for a warehouse use as 1/200 m² of floor area. The general intent and purpose of the minimum parking provision is to ensure that there is sufficient on-site parking for the proposed use.

As detailed in the TIS, ITE Parking Generation data aligns with a parking supply less than the zoning by-law's requirement. The proposed rate reflects the operational characteristics of the proposed use and is supported by the findings of the TIS.

Setbacks from the Natural Environment Zone

Section 4.31.a of Zoning By-law 023-18 requires a 30-metre setback for buildings and structures including private sewage treatment systems and associated tile weeping beds from the limit of the Natural Environment zone. Section 4.31.c permits reduced setbacks from the Natural Environment zone subject to approval from the Conservation Authority.

The intent of this requirement is to ensure that there is no negative impact on the natural heritage features. The Environmental Impact Assessment prepared by Beacon Environmental concludes that the proposed buffers (driplines staked with the Township's consultant) are appropriate. Given that the establishment of the Natural Environment zone includes the natural heritage features and the appropriate buffer areas, the full 30-metre setback from the Natural Environment zone is not required.

A setback of approximately 8 metres from the Natural Environment zone to the sewage disposal area is proposed. Within the sewage disposal area, the dispersal beds are set back 20.0 metres from the edge of the Natural Environment zone. The edge of the Natural Environment zone incorporates a 10.0-metre buffer to the staked dripline of the woodland feature. Combined with the 20.0-metre setback of the dispersal beds from the

Natural Environment zone boundary, this results in a total 30-metre separation between the dispersal beds and the natural heritage feature, fulfilling the intent of the 30-metre setback requirement.

Sensitive Uses Setback

Adopted OPA 131 Policy PA7-10 c), requires zoning provisions to address separation from sensitive uses. The Draft ZBA proposes a minimum 50.0-metre setback from the adjacent rural residential dwellings as supported by Dillon's Land Use Compatibility Study. Further details regarding the proposed setback are provided in Section 5.0 of this Report and in the Land Use Compatibility Study.

7.0
Planning Opinion

7.1 Statement of Conformity with Policy Documents

As discussed in this report, the Provincial Planning Statement (2024) and the Wellington County Official Plan (2025 consolidation), and the Township of Puslinch Zoning By-Law No. 023-18 have been reviewed to assess the appropriateness of the proposed development. It is my opinion that the proposed development is consistent with or conforms to the policies of these documents, as proposed to be amended, and implements good planning that is in the public interest.

7.2 Conclusion

The proposed development represents good planning and is in the public interest as it provides an appropriate industrial use in the Township of Puslinch in accordance with OPA 131, subject to site-specific provisions. Its approval will result in the timely development of an employment use in proximity to major transportation routes that is compatible with the surrounding area and will contribute to the economic development of the Township of Puslinch. The development is consistent with or conforms to relevant Provincial and municipal policy and implements the policies of the Wellington County Official Plan, as proposed to be amended by OPA 131.



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