

Planning Justification Report and ARA Summary Statement

Redford Pit Expansion



Walker Aggregates Inc.

P/N 3581 | August 2025

County of Grey

Municipality of West Grey

North ½ of Lot 20, Concession 5 NDR, Geographic Township of Bentinck

Revision History

Issue	Date	Prepared by:	Revision Notes
First Issue	August 22, 2025	Craig Mathieson BUrbPlan(Hons) Michael Wynia, MCIP RPP	
Revision 1			
Revision 2			
Revision 3			

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Walker Aggregates – Class “A” Pit License

North ½ of Lot 20, Concession 5 NDR,

Geographic Township of Bentinck

1.0 Introduction

Harold Sutherland Construction Ltd (“the client”), a subsidiary of Walker Aggregates Inc., is proposing to establish a new aggregate extraction operation (hereafter referred to as “the Project”, and/or “the pit expansion”) with an annual extraction limit of up to 300,000 tonnes. Extraction will occur to a depth no lower than 1.5 metres above the established water table. The pit expansion is to be located immediately adjacent to the client’s existing Walker Redford Pit, on lands legally described as North ½ of Lot 20, Concession 5 NDR, located north of the intersection of Allan Park Road and Concession 4 NDR (referred to as “the Site” and/or “the subject lands”).

To authorize the pit expansion, the client is applying for a Class “A” Pit Licence (Above Water) under the *Aggregate Resources Act* (“ARA”). Concurrently, a Zoning By-law Amendment application will be submitted to the Municipality of West Grey under the *Planning Act* to permit aggregate extraction on the subject lands. No additional planning or regulatory approvals are anticipated to be required for the Project.

Skelton Brumwell & Associates Inc. (“SBA”) has been retained to prepare this Planning Justification Report, which includes a description of the subject lands, an overview of the Project and its proposed operations, an analysis of the planning policy, an overview of technical studies, and an opinion with respect to the Project. Included in this report is the analysis of the policy contained within the *Provincial Planning Statement 2024* (“PPS2024”), *Grey County Official Plan 2019* (“County OP”), and the *Municipality of West Grey Zoning By-law 37-2006* (“West Grey ZB”), and the ARA with respect to the pit expansion. It is noted that the *Municipality of West Grey Official Plan 2012* (“West Grey OP”) only relates to the settlement areas of Durham and Neustadt, and as such, is not relevant to the Project. The County OP’s policies are instead relevant in this case.

This Planning Justification Report has been prepared on behalf of the client in support of the Project and meets the requirements of both the *Planning Act* and the ARA.

1.1 The Site and Surrounding Environment

The client currently owns and operates the Redford Pit (License No. 624883), a Class A Pit Above Water license with a maximum annual tonnage of 100,000 tonnes. This existing pit is located on 40.9 hectares of land at 381679 Concession 4 NDR in the Municipality of West Grey, and is legally described as Lot 19, Concession 5 NDR in the former Township of Bentick, Municipality of West Grey, County of Grey.

The pit expansion is located immediately east of this existing pit and consists of an approximate plan area of 20.8 hectares, of which approximately 13.8 hectares is proposed for extraction.

The Site contains some woodland vegetation near its very north/northwestern boundary. Aside from this, the Site is largely cleared of vegetation, indicative of its primary agricultural use. It includes a

single residential dwelling and detached shop/garage near its central west portion, with vehicle access achieved via a lengthy driveway located off of Allan Park Road.

The surrounding environment is predominantly agricultural with some rural residential uses serviced by individual private water supply wells. This environment is interspersed with woodland vegetation with some wetland environments present. According to the Ministry of the Environment's Natural Heritage mapping, there is an unevaluated wetland located immediately north and south of the Site, as well as immediately east of the Site (east of the Saugeen River).

The Site is characterized by gently rolling topography, with lower-lying areas located in the southeast, central-west, northwest, and eastern portions. Overall, the land slopes eastward toward the Saugeen River, which is situated immediately east of Allan Parkway Road. On-site elevations range from approximately 289 to 301 metres above sea level. Surface runoff is anticipated to follow the natural topography, draining toward these lower-lying areas and ultimately flowing eastward into a roadside ditch before being conveyed to the Saugeen River.

The Canada Land Inventory maps classify the Site's agricultural soil capability as Class 3s, which have moderate agricultural limitations primarily due to adverse soil characteristics such as low fertility or excessive stoniness. The Site is located outside of the Grey Sauble Conservation Authority ("GSCA") regulation area, and the Source Water Protection Maps identify the site as being within a Highly Vulnerable Aquifer and a Level 6 Significant Groundwater Recharge Area. Both Allan Parkway Road and Concession 4 NDR are classified as 'Municipal Roads'.

A brief description of the environment immediately surrounding the Site, is provided below. An aerial image of the Site and surrounding environment is provided in Figure 1, below.

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|--------------|--|
| North | Woodland environment adjacent to the northern boundary, and agricultural lands. |
| East | Is Allan Park Road. East of Allan Park Road are rural residential properties, agricultural lands, and areas of dense woodland vegetation and wetlands associated with the Saugeen River. |
| South | South is an agricultural lot, with the centre occupied by a woodland and wetland environment. The dwelling on this lot is located near the intersection with Concession 4 NDR and Allan Parkway. |
| West | To the west is the client's existing Redfort Pit, with extraction operations currently confined to the southern area of this Site, and the remainder being farmed. |



Figure 1: Aerial view of the Site and surrounding environment.

1.1.1 Land Use Classification

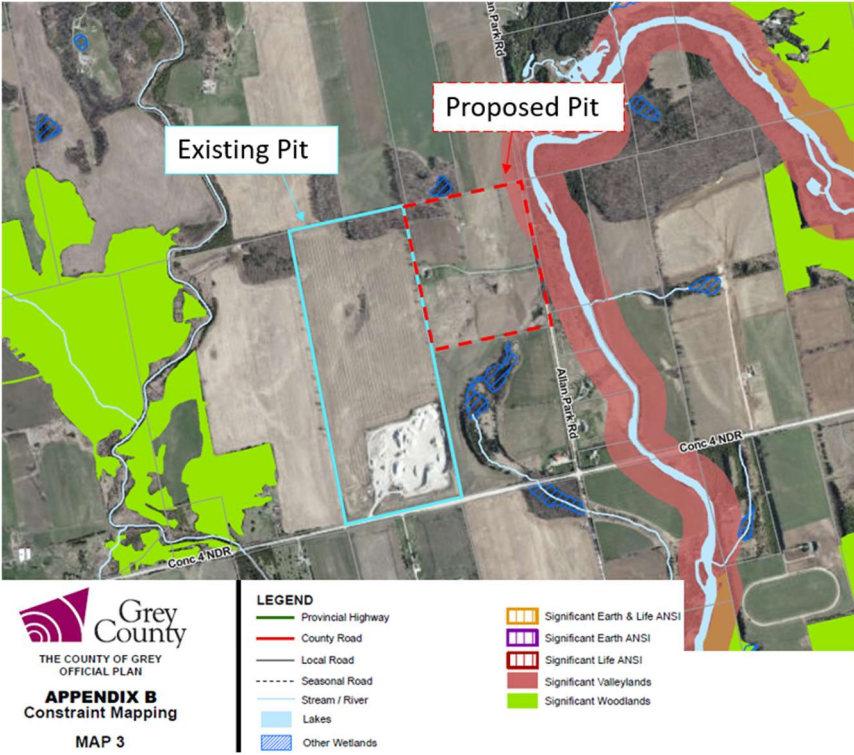
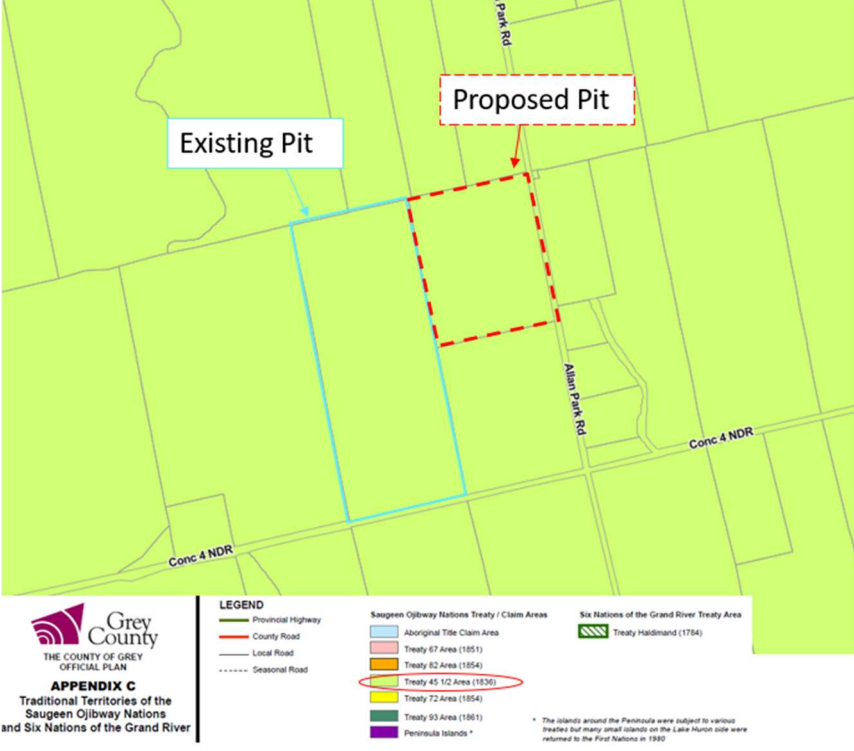
The land use designation and zoning of the Site in terms of the County OP and West Grey ZB is shown in Table 1, below. Maps related to Schedule C (Natural Heritage System Core Areas and Linkages), Appendix A (Constraint Mapping), and Appendix E (Bedrock and Shale Resources) were not included as they have no relevance to the Site.

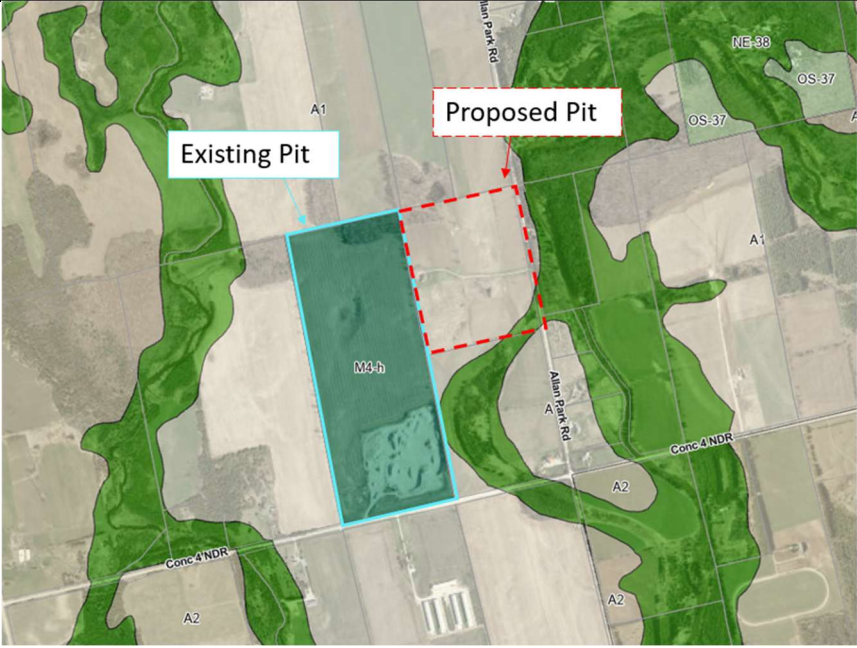
To summarize, the Site is:

- Designated as 'Agricultural', with a small area in the southeastern portion designated as 'Hazard Lands' under Schedule A of the County OP;
- Identified as a 'Aggregate Resource Area' under Schedule B of the County OP; and
- Zoned as 'Agricultural (A1)' under the West Grey Zoning Maps.

Table 1: Land Use Classification of the Site.

Planning Document	Classification	Map
County OP Schedule A (Land Use Types)	The Site is designated as 'Agricultural', with a small area in the southeastern corner designated as 'Hazard Lands'.	Grey County THE COUNTY OF GREY OFFICIAL PLAN SCHEDULE A Land Use Types MAP 3 LEGEND - Provincial Highway - Provincial Highway Connecting Link - County Road - Local Road - Seasonal Road - Agricultural - Special Agricultural - Rural - Primary Settlement Area * - Secondary Settlement Area * - Inland Lakes & Shoreline Settlement Area - Recreational Resort Settlement Area - Sunset Strip Settlement Area - Industrial Business Park Settlement Area - Space Extensive Industrial and Commercial - Niagara Escarpment Plan Boundary ** - Niagara Escarpment Development Control Area - Escarpment Natural Area - Escarpment Recreation Area - Hazard Lands - Provincially Significant Wetlands and Significant Coastal Lands * refer to Secondary Schedules for further detail. ** certain settlement areas within the Niagara Escarpment Plan Boundary may be subject to Development Control
County OP Schedule B (High Potential Mineral Aggregate Resources)	The Site is classified as 'Aggregate Resource Area'.	Grey County THE COUNTY OF GREY OFFICIAL PLAN SCHEDULE B High Potential Mineral Aggregate Resources MAP 3 LEGEND - Provincial Highway - County Road - Local Road - Seasonal Road - Aggregate Resource Area - Mineral Resource Extraction Licensed Pits and Quarries

County OP Appendix B (Constraint Mapping)	Significant Valleylands, associated with the Saugeen River, appears to intersect the northeastern corner of the Site. Wetlands exist outside, but adjacent to the north and south boundaries of the Site.	
County OP Appendix C (Traditional Territories of the Saugeen Ojibway Nations and Six Nations of the Grand River)	The Site is located within the following Saugeen Ojibway Nations Treaty / Claim Area: Treaty 45 ½ Area (1836).	

West Grey ZB (Zoning Maps)	The Site is zoned as 'Agricultural (A1)', with a small area in the southeastern corner zoned Natural Environment (NE)'.	
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1.2 Project Overview

The Project involves the establishment of a Class A, Pit Above Water license for a 20.8-hectare area, allowing for the extraction, processing, and shipping of aggregate resources. Of this, approximately 13.8 hectares comprise the extractable area, with an annual maximum extraction limit of 300,000 tonnes. The pit expansion will be located immediately adjacent to the client’s existing Redford Pit (License No. 624883), which is also a Class A Pit Above Water operation, with a licensed annual tonnage of 100,000 tonnes. The pit expansion will have its own aggregate license.

Primary access to the Site will be via the existing entrance off Concession 4 NDR, which currently serves the Redford Pit. The existing infrastructure—including scales and associated equipment—will be utilized for the new operation. An alternative access point from Allan Park Road has also been identified and will be available if required. Initially, aggregate processing will take place at the existing Redford Pit; however, the site plan includes a designated processing area within the subject lands, should on-site processing be needed in the future. The existing residential dwelling and shop/garage are proposed to be retained and repurposed as on-site office and support facilities for the extraction operation.

Extraction is planned in two phases. Phase 1 will begin in the southwest portion of the Site and proceed northeast toward the center. Phase 2 will continue from the center toward the northeastern boundary. All extraction will maintain a minimum separation of 1.5 metres above the maximum predicted water table elevation, determined to be 289.76 metres above sea level. Where feasible, agricultural use of the non-extracted areas will continue concurrently with extraction activities.

As extraction progresses, topsoil and subsoil will be stripped from operational areas and either stockpiled or used to construct berms for visual screening and noise attenuation. A berm will be constructed along the southern boundary using material stripped from Phase 1 lands, while a berm along the eastern boundary will utilize material from Phase 2 lands. All berms will be vegetated and maintained to minimize erosion and control dust emissions.

The pit will operate during daytime hours, from 7:00 a.m. to 7:00 pm, Monday through Saturday. No operations will occur on Sundays or statutory holidays. Drainage from undisturbed areas will continue in accordance with existing site conditions, while runoff from disturbed areas will be contained within the extraction limits and allowed to infiltrate naturally through the pit floor.

Standard construction and aggregate processing equipment will be used, including but not limited to dump trucks, loaders, excavators, backhoes, bulldozers, scrapers, conveyors, and portable processing equipment.

Final site rehabilitation will be compatible with the surrounding agricultural and rural/residential land uses. Rehabilitation will involve regrading slopes at a maximum of 3:1 from the extraction limits down to the pit floor using the stored topsoil and subsoil, returning the land to agricultural use once extraction is complete.

The existing features, operational plan, and proposed rehabilitation strategy are detailed in the Site Plan (Appendix A), which has been prepared in accordance with the Provincial Standards for sand and gravel operations. The Site Plan also integrates recommendations from all supporting technical studies (where relevant) to ensure potential impacts on adjacent land uses are appropriately mitigated (see Section 1.4 of this report).

1.3 Required Applications

A Class A Pit Above Water application is required under the ARA, with application materials provided in accordance with the “Aggregate Resources of Ontario: Technical Reports and Information Standards August 2023” (“ARA Standards”).

As detailed in section 1.1.1 above, the Site is designated as an ‘Aggregate Resource Area’ on Schedule B of the County OP. This designation functions as an overlay on the underlying ‘Agricultural’ designation shown on Schedule A. Accordingly, the policies and permitted uses associated with the ‘Agricultural’ designation continue to apply until such time as the Site is licensed for sand, gravel, or bedrock extraction.

Policy 5.6.2(3) of the County OP, which pertains to ‘Aggregate Resource Area’ policies, is particularly relevant. It states:

“Sand and/or gravel operations are permitted within the Aggregate Resource Areas and within Mineral Resource Extraction land use types identified on Schedule B without a change to this Plan. A municipal official plan amendment will not be required for all new or expanding sand and/or gravel operations within areas identified as Aggregate Resource Areas on Schedule B. A zoning by-law change will be required for all new or expanding mineral aggregate operations that are not currently licensed.”

Given that the Site is located within the ‘Aggregate Resource Area’, no amendment to the County or Municipal Official Plan is required to facilitate the proposed extraction operation; however, as the pit is not currently licensed, a Zoning By-law Amendment will be required to permit mineral aggregate extraction. It is noted that the West Grey OP applies only to the settlement areas of Durham and Neustadt and, therefore, does not apply to this Project.

Under the West Grey ZB, the Site is currently zoned ‘Agricultural (A1)’, with a small area in the southeastern corner zoned ‘Natural Environment (NE)’. As mineral aggregate extraction is not a permitted use within the ‘Agricultural (A1)’ zone, it is proposed to rezone the ‘Agricultural (A1)’

portion of the lands to ‘Extractive Industrial (M4)’ to permit the pit expansion through a Zoning By-law Amendment.

To summarise, the required applications under the *Planning Act* and ARA to permit the Project are detailed in Table 2, below.

Table 2: Applications Required to Permit the Project.

Application	Approval Authority
Zoning By-law Amendment	Municipality of West Grey
ARA Licence Application	Ministry of Natural Resources

1.4 Technical Reports

As required by the *Planning Act* and ARA applications, technical studies were undertaken to assess the potential impact of the Project on the surrounding environment, including nearby residential uses, natural environment, cultural heritage and hydrogeology, and to recommend mitigation measures. These technical reports were determined based on the requirements of the County OP (Policy 5.6.4(4)), and Part 2.0 of the ARA Standards.

These documents will be submitted to the Municipality of West Grey for the purposes of the required planning approvals and to the Ministry of Natural Resources as part of the ARA application.

Table 3 identifies the reports and technical studies required to accompany the applications. Relevant information within each technical report has been used to assess consistency of the proposal with the relevant planning policy. Further details on the results and mitigation/recommendations can be found within these separately submitted reports; a brief summary of each technical report is provided below for ease of reference.

Table 3: List of Required Reports.

Report	Author	Date
Stage 1 and 2 Archaeological Assessment	AMICK Consultant's Limited	March 2025
Stage 3 Archaeological Assessment	Archaeological Research Associates Ltd	July 2025 (ongoing)
Natural Environment Report – Level 1 and 2	SBA	August 7, 2025
Combined Level 1 and 2 Hydrogeological Assessment	Tatham Engineering	July 22, 2025
Noise Impact Assessment	HGC Engineering	July 22, 2025
Traffic Impact Study	SBA	July 23, 2024
Agricultural Impact Assessment	Colville Consulting Inc.	June 2025
Air Quality memo and Best Management Practices Plan	RWDI Consulting Engineers and Scientists	August 21, 2025

Planning Justification Report and ARA Summary Statement	SBA	August 2025
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1.4.1 Stage 1, 2 and 3 Archaeological Assessment

A Stage 1 & 2 Archaeological Assessment was completed by AMICK Consultant's Limited to assess the archaeological potential within the Site. The entirety of the proposed 20.8 hectares licensed area was assessed. The Stage 1 assessment determined that the study area comprised areas of archaeological potential. As a result of the Stage 2 assessment, one isolated artifact was documented. The location of this isolated artifact is adjacent to Allan Park Road, near the northeastern portion of the property, and is shown in Figure 2, below.

As a result of this finding, a Stage 3 Site-specific Assessment of the Allan Park Road Site is required in order to determine the extent, cultural significance, and integrity of the archaeological site, and to provide recommendations. This Stage 3 assessment will be undertaken by Archaeological Research Associates Ltd to ensure the proper evaluation and protection of the identified artifact, and any recommendations resulting from the Stage 3 assessment will be fully implemented on the property.



Figure 2: Location of the isolated artifact discovered by AMICK Consultants Limited during the Stage 2 Archaeological Assessment.

1.4.2 Level 1 and 2 Natural Environment Report

A Natural Environment Report (Level 1 and 2) has been prepared by SBA to support the application for the proposed Class “A” Pit Above Water. This report identifies natural areas and features within the Site and adjacent lands in order to establish the Project’s consistency with the natural heritage protection policies of the PPS 2024, and County and local Official Plans, and has been prepared in accordance with the ARA Standards.

The Natural Environment Report determined that there are no provincially significant wetlands, significant woodlands, or Areas of Natural and Scientific Interest (“ANSI”) on or adjacent to the Site. The adjacent lands do contain natural heritage features in the form of a significant valleyland, fish habitat, and significant wildlife habitat features; however, these all lie outside of the proposed extraction area and are protected from development impact by a combination of buffers, berms and utilization of sediment and erosion control. The proposed 1.5 metre minimum extraction buffer above the water table further protects these features.

The woodland located on the Site and adjacent lands to the north of the proposed extraction area acts as habitat for endangered bat species; however, no disturbance to the woodland is proposed and appropriate buffers to the limit of extraction are also established.

An endangered Butternut tree is located on the Allan Park Road allowance; however, this tree is well separated from the potential extraction area and will not be impacted.

The Natural Environment Report acknowledges that Site preparation and extraction will require some minor incidental tree removal outside the woodlands, and recommends a tree clearing window to avoid any impact to migratory birds and roosting bats.

Overall, the Natural Environment Report concludes that, with full implementation of recommended avoidance and mitigation measures, there will be an appropriate level of policy consistency and conformity in the context of the requirements set out by the provincial and municipal policies applicable to the Project.

1.4.3 Combined Level 1 and 2 Hydrogeological Assessment

A combined Level 1 and 2 Hydrogeological Assessment was completed by Tatham Engineering in accordance with the ARA Standards to support the pit expansion. The assessment evaluates the depth to the maximum groundwater table, expressed in metres above sea level, relative to the proposed excavation depth, and provides recommended mitigation measures to prevent adverse impacts on water quality.

The assessment concluded that the high groundwater table across the Site ranges from approximately 288.4 to 289.8 metres above sea level. Based on the proposed extraction limits and mitigation strategies, no adverse effects on groundwater or surface water resources, or their respective users, are anticipated during either the operation or rehabilitation phases of the pit. Complete details and technical findings are presented in the Hydrogeological Assessment prepared by Tatham Engineering.

1.4.4 Noise Impact Assessment

A Noise Impact Assessment was prepared for the Project by HGC Engineering to assess the potential impact of noise from the pit expansion at neighbouring noise sensitive receptors, in accordance with

the guidelines of the Ministry of Natural Resources and the Ministry of the Environment, Conservation and Parks.

The acoustical analysis indicates that sound levels from the pit expansion, predicted under worst-case operating scenarios and with the noise control measures recommended, will comply with MECP guideline limits at the existing, most potentially impacted, neighbouring receptors.

The Noise Impact Assessment has recommended noise control measures that should be incorporated into the operational plans for the pit, and can be viewed at Appendix B of that report.

1.4.5 Traffic Impact Study

A Traffic Impact Study was prepared by SBA, in accordance with the ARA Standards, to evaluate the anticipated transportation impacts of the pit expansion operation. The study assesses whether the existing local road infrastructure can accommodate the projected truck traffic and identifies any required upgrades or mitigation measures to ensure safe and efficient operation.

The following conclusions were made:

- *“At the maximum licensed tonnage for the proposed aggregate extraction operation, the proposed Walker – Redford Pit Expansion could generate an average of 125 trips per day from May to November. It is estimated that this volume could result in a peak hour volume of up to 12 trips per hour (6 in / 6 out).*
- *Trucks from the expanded pit will use Concession 4 to access Grey Road 3. Most trucks would likely head south to Grey Road 4 with a smaller percentage going north.*
- *Trucks turning at the intersection of Concession Road 4 and Grey Road 3 are expected to be able to do so without experiencing any delays, both in the existing (2025) and future (2035) background traffic conditions. The intersection will continue to operate at a good Level of Service.*
- *The combination of the volume of trucks turning onto Concession 4 from Grey Road 3 and the background traffic volume on Grey Road 3 is not sufficient to warrant any auxiliary turning lanes.*
- *Concession 4 is paved between Grey Road 3 and the pit entrance and no further improvements are recommended at this time.*
- *The roundabout at the intersection of Grey Road 3 and Grey Road 4 that is currently being built will greatly improve the safety of the intersection and eliminate any concerns with increased truck traffic at this location.*
- *There are no recommendations within this Traffic Impact Study that impact the ARA Site Plan.”*

1.4.6 Agricultural Impact Assessment

An Agricultural Impact Assessment (“AIA”) for the Redford Pit Expansion was prepared by Colville Consulting Inc. in accordance with the ARA Standards, to characterize the agricultural land base and operations within the subject lands and surroundings, identify potential impacts resulting from the Project, and recommended mitigation measures to avoid or minimize those impacts.

As detailed in Section 6.1.1 of the AIA:

“The Subject Lands are comprised of prime agricultural lands (58.95%) and non-prime agricultural lands (41.05%). The proposed extraction will be phased, limiting the amount of

lands impacted by removal of prime agricultural lands at any given time. The loss of prime agricultural lands will primarily be an interim loss, as the Subject Lands will be progressively rehabilitated for an agricultural after use. The side slopes of the pit, which will account for approximately 1.35 ha of the Subject Lands following rehabilitation, will create topographic limitations which reduce the agricultural capability of these lands. Of the 1.35 ha of side slopes, approximately 0.72 ha are prime agricultural lands. Ultimately, the proposed extraction will result in a minimal loss of approximately 0.72 ha of prime agricultural lands. The temporary loss of prime agricultural lands (12.26 ha) and the permanent loss of approximately 0.72 ha of prime agricultural lands are expected to have a negligible impact on the Agricultural System in the area.”

Colville Consulting Inc concluded that:

“With the implementation of the recommended mitigation measures, the proposed Redford Pit expansion operation will have minimal effect on the surrounding land uses.”

Those mitigation measures include:

- Progressive rehabilitation to return the Subject Lands to a similar agricultural condition;
- Implementation of recommendations contained in the hydrogeological report; and
- To adhere to Ministry of Environment, Conservation and Parks guidelines.

1.4.7 Air Quality Memo and Best Management Practices Plan

An Air Quality Memo and Best Management Practices Plan (“BMPP”) for the Redford Pit Expansion was prepared by RWDI Consulting Engineers and Scientists (“RWDI”). The Air Quality memo indicates that the primary air emissions associated with sand and gravel extraction consists of fugitive dust, and tailpipe emissions associated with vehicles and heavy equipment, and that fugitive dust is normally managed at aggregate facilities through a BMPP developed in accordance with the MECP’s Technical Bulletin: Management Approaches for Industrial Fugitive Dust Sources.

The Air Quality memo concludes that, with the implementation of the BMPP prepared for the Project, it is expected that the Project will not result in unacceptable air quality impacts in the surrounding community, and that the potential for adverse effects will be minimized. The Air Quality memo indicates that potential cumulative effects from the Project, in combination with other nearby aggregate operations, are expected to be minimal.

2.0 Policy Context and Analysis

In Ontario's hierarchical, policy-led planning system, planning proposals must be consistent with and conform to a variety of legislation and policy documents, including the Planning Act, the PPS2024, the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan, the Niagara Escarpment Plan, and other strategies and agreements, as applicable geographically.

The following sub-sections provide an overview of applicable policies with regard to the Project.

2.1 Planning Act, RSO 1990

The *Planning Act* is provincial legislation which sets out the basis for land use planning in Ontario. Planning decisions must have regard for matters of provincial interest set out under Section 2 of the Act. Those considered most relevant to the application are set out below, followed by an assessment against those relevant provisions.

- (a) *the protection of ecological systems, including natural areas, features and functions;*
- (b) *the protection of the agricultural resources of the Province;*
- (c) *the conservation and management of natural resources and the mineral resource base;*
- (d) *the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;*
- (k) *the adequate provision of employment opportunities;*
- (l) *the protection of the financial and economic well-being of the Province and its municipalities;*
- (p) *the appropriate location of growth and development;*

As detailed in section 1.4.2 of this report, a Natural Environment Report has been prepared by SBA and concludes that, with full implementation of recommended avoidance and mitigation measures, there will be an appropriate level of policy consistency and conformity in the context of the requirements set out by the provincial and municipal policies applicable to Project. This ensures the protection of ecological systems, natural areas, features and functions, in accordance with section 2(a) of the Planning Act.

As detailed in section 1.4.6 of this report, an AIA was prepared by Colville Consulting Inc, and concluded that, with implementation of recommended mitigation measures (including returning the lands to a similar agricultural condition upon completion of extraction activities), that the proposed Redford Pit expansion operation will have minimal effect on prime agricultural lands, including the agricultural land base of surrounding land uses, in accordance with section 2(b) of the Planning Act.

As outlined in section 1.4.3 of this report, a Hydrogeological Assessment was prepared by Tatham Engineering and concluded that, given the proposed limit of extraction will maintain a minimum separation of 1.5 metres above the maximum predicted water table elevation, no adverse effects on groundwater or surface water resources, or their respective users, are anticipated during either the operation or rehabilitation phases of the pit. The Project seeks to extract sand and gravel resources in a manner that ensures the mineral resource base is utilized responsibly while preserving ecosystems and supporting long-term sustainability, in accordance with clause 2(c) of the *Planning Act*.

As outlined in section 1.4.1 of this report, the Stage 2 Archaeological Assessment identified one isolated artifact near the northwestern area of the property, adjacent to Allan Park Road. A Stage 3 assessment was therefore required to ensure this artifact is protected, and any recommendations resulting from the Stage 3 assessment will be fully implemented on the property in accordance with clause 2(d) of the *Planning Act*.

Sand, gravel and aggregate resources are a provincial interest. The Project will provide additional high-quality sand and gravel material to the local and regional markets, and there is proven local demand for this resource as demonstrated by the existing pit (License No. 624883). An expanded pit operation also provides employment opportunities as well as revenue flow for the Municipality and County due to annual tonnage contributions and the additional source of sand and gravel to the market. The location of the Project is considered appropriate, as supported by technical reports prepared in support of the Project, and as assessed further in this report in relation to relevant policy. The Project is therefore considered to be consistent with clauses 2(k), (l) and (p) of the *Planning Act*.

Overall, given the above assessment, it is considered that the Project, requiring a Class “A” Pit Above Water licence, successfully addresses the requirements of the *Planning Act*.

2.2 Provincial Planning Statement, 2024

Provincial policy is issued under Section 3 of the Planning Act, and it contains overall policy directions on matters of provincial interest related to land use planning and development. All Official Plans and amendments thereto must be consistent with provincial policy.

The PPS 2024 is divided into four key sections: Building Homes, Sustaining Strong and Competitive Communities; Infrastructure and Facilities; Wise Use and Management of Resources; and Protecting Public Health and Safety.

The PPS 2024 policies of most relevance to the Project are outlined and assessed, below.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

Rural Areas in Municipalities

2.5.1 *Healthy, integrated and viable rural areas should be supported by:*

- a) *building upon rural character, and leveraging rural amenities and assets;*
- b) *promoting regeneration, including the redevelopment of brownfield sites;*
- c) *accommodating an appropriate range and mix of housing in rural settlement areas;*
- d) *using rural infrastructure and public service facilities efficiently;*
- e) *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;*
- f) *providing opportunities for sustainable and diversified tourism, including leveraging historical, cultural, and natural assets;*
- g) *conserving biodiversity and considering the ecological benefits provided by nature; and*
- h) *providing opportunities for economic activities in prime agricultural areas, in accordance with policy 4.3.*

In accordance with the PPS, the Subject Lands are situated within a “Rural Area”, being characterized by a mix of prime agricultural lands, natural heritage features, and identified resource areas (mineral aggregates). Policy 2.5.1 promotes the development of healthy, integrated, and viable rural areas by enabling the sustainable management or use of natural resources to support a diversified economic base, whilst also ensuring conservation values are protected.

The proposed Redford Pit expansion leverages a known aggregate resource adjacent to an existing licensed pit, thereby supporting economic diversification and resource-based employment opportunities, as encouraged under policy 2.5(e). This form of rural economic activity contributes directly to a viable rural economy while building upon the rural asset base referenced in policy 2.5(a).

To ensure that the natural and agricultural values of the area are protected, both a Natural Environment Report and an AIA have been completed. The Natural Environment Report concludes that extraction activities can occur without adverse impacts on natural heritage features, supporting the ecological conservation objectives of policy 2.5(g). The AIA (required under Policy 4.3) confirms that the proposal, which will be progressively rehabilitated back to agricultural use, will have a negligible impact on the agricultural system, ensuring that economic activities within prime agricultural areas remain viable for the long-term, consistent with policy 2.5(h).

Taken together, this assessment demonstrates consistency with the broader intent of Section 2.5 of the PPS by contributing to an economically diverse and environmentally responsible aggregate operation within the rural area.

Chapter 3: Infrastructure and Facilities

Land Use Compatibility

3.5.1 *Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.*

3.5.2 *Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.*

The Project has been designed and buffered to mitigate potential adverse effects. Risk to public health and safety are minimized by the implementation of the mitigation measures and recommendations of the technical reports required by the ARA, thereby ensuring consistency with the land use compatibility policies of the PPS.

Chapter 4: Wise Use and Management of Resources

Natural Heritage

- 4.1.1 *Natural features and areas shall be protected for the long term.*
- 4.1.2 *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, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*
- 4.1.4 *Development and site alteration shall not be permitted in:*
- a) *significant wetlands in Ecoregions 5E, 6E and 7E; and*
 - b) *significant coastal wetlands.*
- 4.1.5 *Development and site alteration shall not be permitted in:*
- a) *significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;*
 - b) *significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);*
 - c) *significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);*
 - d) *significant wildlife habitat;*
 - e) *significant areas of natural and scientific interest; and*
 - f) *coastal wetlands in Ecoregions 5E, 6E and 7E that are not subject to policy 4.1.4(b)*
- unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.*
- 4.1.6 *Development and site alteration shall not be permitted in fish habitat except in accordance with provincial and federal requirements.*
- 4.1.7 *Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.*
- 4.1.8 *Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas 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 on their ecological functions.*

As detailed in section 1.4.2 of this report, a Natural Environment Report (Level 1 and 2) has been prepared. This report notes that the Site supports limited natural heritage features which consist of a portion of a non-significant woodland along the north property boundary and unevaluated wetlands in the eastern and south-eastern portion of the site which are located outside the proposed limits of extraction. The Natural Environment Report concludes that, with full implementation of recommended avoidance and mitigation measures, the Project will be consistent with relevant policy directives, which includes the natural heritage policies of the PPS.

Water

- 4.2.2 *Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches.*

The Hydrogeological Study confirms the maximum predicted water table within the Site. Pit excavations will retain a 1.5 metre separation distance between high groundwater level, ensuring there would be no impact to local water supply wells, surface water features, or associated ecological receptors in the area. Groundwater and surface water features are therefore protected to ensure policy consistency with policy 4.2.2 of the PPS.

Agriculture - Non-Agricultural Uses in Prime Agricultural Areas

4.3.5.1 (a) *Planning authorities may only permit non-agricultural uses in prime agricultural areas for:*

a) extraction of minerals, petroleum resources and mineral aggregate resources;

4.3.5.2 *Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.*

Mineral Aggregate Resources

4.5.1.1 *Mineral aggregate resources shall be protected for long-term use and, where provincial information is available, deposits of mineral aggregate resources shall be identified.*

4.5.2.1 *As much of the mineral aggregate resources as is realistically possible shall be made available as close to markets as possible.*

Demonstration of need for mineral aggregate resources, including any type of supply/demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere.

4.5.2.2 *Extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts.*

4.5.3.1 *Progressive and final rehabilitation shall be required to accommodate subsequent land uses, to promote land use compatibility, to recognize the interim nature of extraction, and to mitigate negative impacts to the extent possible. Final rehabilitation shall take surrounding land use and approved land use designations into consideration.*

4.5.3.2 *Comprehensive rehabilitation planning is encouraged where there is a concentration of mineral aggregate operations.*

4.5.4.1 *In prime agricultural areas, on prime agricultural land, extraction of mineral aggregate resources is permitted as an interim use provided that:*

a) impacts to the prime agricultural areas are addressed, in accordance with policy 4.3.5.2; and

b) the site will be rehabilitated back to an agricultural condition.

Policies 4.3.5.1(a) and 4.4.4.1 of the PPS permit the extraction of mineral aggregate resources within prime agricultural areas, provided certain conditions are met. In accordance with Policy 4.3.5.2, an AIA was completed, which confirmed that the proposed expansion, designed to be progressively rehabilitated back to agricultural use, will have a negligible impact on the surrounding Agricultural System.

The proposal involves the logical extension of an existing licensed mineral aggregate operation. The existing infrastructure and established haul routes will continue to be used, and the proposed expansion reflects a demonstrated and ongoing demand for the resource. The location and design of the extraction area, including appropriate setbacks, have been refined in response to the findings of various technical studies, as summarized in section 1.4 of this report. These refinements ensure that potential social, economic, and environmental impacts are minimized.

Progressive rehabilitation is proposed to occur concurrently with extraction, involving the recontouring and restoration of the Site to a condition that supports future agricultural use. This approach maintains the long-term agricultural potential of the land, supporting the PPS objective of protecting prime agricultural areas for future generations while enabling the sustainable use of aggregate resources.

Accordingly, the proposal is consistent with the policies of the PPS relating to both agriculture and mineral aggregate resource extraction.

Cultural Heritage and Archaeology

- 4.6.2 *Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.*

A Stage 2 Archaeological Assessment identified a single isolated artifact near the northwestern portion of the property, adjacent to Allan Park Road. In accordance with PPS Policy 4.6.2, which requires the conservation of significant archaeological resources, a Stage 3 Archaeological Assessment was therefore required to further evaluate and protect the identified find, and any recommendations resulting from the Stage 3 assessment will be fully implemented on the property. This ensures that the proposal is consistent with the PPS requirement to conserve cultural heritage resources in areas of development or site alteration.

Chapter 5: Protecting Public Health and Safety

Natural and Human-Made Hazards

- 5.1.1 *Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.*

Constraint mapping, including that provided by the Saugeen Conservation Authority, identifies potential hazards associated with the nearby Saugeen River. These features are located either off-site to the east (across Allan Park Road) or within the southeastern corner of the subject lands. The proposed extraction area has been appropriately set back from these features to ensure compatibility and avoid any encroachment into hazard lands.

Overall, there are no natural or human-made hazards that would adversely affect the feasibility or long-term viability of the proposed aggregate extraction operation. The proposal is therefore consistent with PPS policies related to public safety and development in hazard areas.

Considering the above, it is considered the granting of permits for the Project will be consistent with the relevant provisions of the PPS2024.

2.3 County of Grey Official Plan, 2019

The upper-tier Official Plan is the broad planning document which deals with planning matters affecting all lower-tier municipalities within its jurisdiction. The County OP was fully approved in 2019 and provides direction for the development of lower-tier Official Plans and addresses cross-jurisdictional matters, such as transportation and infrastructure, growth management, and natural heritage.

The Site is designated as 'Agricultural' on Schedule A of the County OP, and a small area in the southeastern corner of the Site is designated as 'Hazard Lands'. The entire Site is identified as 'Aggregate Resource Area' on Schedule B.

The County OP policies considered most relevant to the application are set out below, followed by an assessment against those relevant policies.

Cultivate Grey

5.6.2.1 *The Aggregate Resource Area land use type on Schedule B act as overlays on top of other land use types shown on Schedule A to the Plan. Where the Aggregate Resource Area overlaps an Agricultural, Special Agricultural, Rural, or Hazard Lands land use type, the policies and permitted use of the underlying land use types shall apply until such time as the site is licensed for sand, gravel, or bedrock extraction.*

5.6.4.1 *The following proposed mineral aggregate extraction operations will require an amendment to the County Official Plan except for those proposed within the Niagara Escarpment Plan Area as shown on Schedule A-Maps 1, 2 and 3:*

- a) *All new or expanding quarry operations proposed within the County of Grey;*
- b) *All new sand and/or gravel operations proposed outside of the areas identified as an Aggregate Resource Area shown on Schedule B, or within Core Areas shown on Schedule C; and,*
- c) *All proposed expansions beyond the areas identified as an Aggregate Resource Area on Schedule B*

For new or expanding sand and/or gravel operations proposed within the Aggregate Resource Area identified on Schedule B, a County Official Plan Amendment and a local municipal official plan amendment will not be required. Should the proposed operation receive a license under the Aggregate Resources Act, the Mineral Resource Extraction area will be identified on Scheduled B at the time of the next update to this Plan. A zoning by-law amendment will be required.

5.6.4.2 *Where a new or expanded pit operation is proposed partially within an Aggregate Resource Area and partially outside of an Aggregate Resource Area, an amendment to this Plan is required for those areas outside of the Aggregate Resource Area. If the proposed extraction area is within the Aggregate Resource Area, an amendment to this Plan is not required.*

5.6.4.3 *Where pit or quarry operations are being proposed in close proximity to one another, in a similar timeframe, cumulative impacts need to be addressed. Background and technical reports will be reviewed simultaneously and a joint third party peer reviewer may be requested to review the studies. If a pit or quarry operation is being proposed in an area where there are already existing pit and quarry operations within close proximity, cumulative impacts such as traffic and noise may be considered in the technical reports. These requirements will be outlined further at the time of pre-submission consultation.*

5.6.4.4

The following studies/reports, prepared by qualified individuals, shall be provided to support applications for new or expanded pits or quarries. These studies/reports shall meet the requirements of the Planning Act, Provincial Policy Statement, Niagara Escarpment Plan (if within the Niagara Escarpment Plan area), County Official Plan, and municipal Official Plans (where applicable):

- a) Submission of copies of all documentation provided to the Ministry of Natural Resources and Forestry as required for licensing, pursuant to the Aggregate Resources Act;*
- b) A planning report prepared by a Registered Professional Planner, addressing the requirements of the Planning Act, Provincial Policy Statement, Niagara Escarpment Plan (if within the Niagara Escarpment Plan area), County Official Plan, and municipal Official Plans (where applicable);*
- c) A noise impact study in accordance with the Aggregate Resources of Ontario: Provincial Standards;*
- d) A Traffic Impact Study and/or road assessment, unless otherwise waived at the discretion of municipal, County, or Provincial road authorities, based on the amount of traffic involved, or the existing construction of the haul route roads;*
- e) For mineral aggregate operations proposing to remain above the established water table level as identified in the Aggregate Resources of Ontario: Provincial Standards, a letter of opinion shall be provided by a qualified individual estimating the current water table level, determining whether the proposed operation will have any impacts to the quality or quantity of the surface or groundwater resources, as well as how any impacts relate to natural areas, features and systems;*
- f) A hydrogeological study for proposed aggregate operations looking to proceed below the established water table level identified in the Aggregate Resources of Ontario: Provincial Standards;*
- g) An environmental impact study, however a Level 2 – Natural Environment Report required under the Aggregate Resources Act can act as a substitute for an environmental impact study. Where there are discrepancies between the terms of reference for a Natural Environment Report or an environmental impact study, as defined by this Plan, the more protective study requirements shall be considered applicable;*
- h) An archaeological assessment prepared by a qualified individual;*
- i) An Agricultural Impact Assessment, if the proposed new or expanding extraction operation is within the Agricultural or Special Agricultural land use types, that evaluates the potential impacts on agriculture, including agricultural operations, agricultural uses, and prime agricultural areas and recommends ways to avoid or, if avoidance is not possible, minimize and mitigate adverse impacts, as well as inform future rehabilitation of a proposed mineral aggregate operation;*
- j) A progressive rehabilitation plan, including the use of maximum disturbed area provisions where feasible.*

The requirements of this section do not prejudice a municipality from asking for additional studies/reports in support of a pit or quarry application, where official plan policies require such studies/reports. Where there is a discrepancy between a defined study/report in this Plan, the Planning Act, or the Provincial Policy Statement, and the Aggregate Resources of Ontario: Provincial Standards under the Aggregate Resources Act (or any successor thereto), the more protective standard shall be applied, unless deemed by the Ministry of Natural Resources and Forestry to be in conflict with Provincial legislation or regulation.

The County requires that the proponent consult with the County and the local municipality prior to submitting any pit or quarry application to determine the scope of the studies that are required.

5.6.5.2 *Access to pit or quarry operations shall be from a public road that is of a construction and standard to service the traffic associated with the use. Haul routes should be identified to minimize the impact of truck traffic on residential uses and avoid existing settlement areas where practically feasible. The County recognizes that Provincial Highways and County Roads shall constitute the majority of the haul routes with Grey County. There are instances where haul routes will be required to pass through settlement areas, based on the need to use Provincial Highways and County Roads. The above policy shall not be interpreted so as to prohibit haul routes through settlement areas using Provincial Highways and County Roads.*

5.6.5.9 *The County requires the progressive rehabilitation of pit or quarry operations back to agricultural uses. Maximum Disturbed Area provisions should be included on the license, where feasible, to ensure progressive rehabilitation. Progressive and final rehabilitation is required to:*

- a) Accommodate subsequent land uses;*
- b) To promote land use compatibility; and*
- c) To recognize the interim nature of extraction, in accordance with the rehabilitation plans as part of the license.*

Progressive rehabilitation is required where feasible. Final rehabilitation shall take surrounding land uses and approved land use types into consideration.

The Project is located entirely within the County's 'Aggregate Resource Area', as identified in Schedule B. As detailed in Policy 5.6.2.1 of the County OP, the underlying 'Agricultural' land use provisions apply to the Site, until such time the site is licensed for sand, gravel, or bedrock extraction. This is what is proposed for the Project, and as specified in Policy 5.6.4.1, will not require an OP amendment.

The County lists a number of technical studies that are required to be provided for applications for new pits and quarries. In this case, and as already has been summarized in section 1.4 of this report, a Planning Justification Report, Hydrogeological Assessment, Environmental Impact Study, Noise Impact Assessment, Traffic Impact Assessment, Archaeological Assessment, and an AIA has been prepared by suitably qualified professionals in support of this sand and gravel extraction permit application in compliance with this policy requirement. A Rehabilitation Plan has also been prepared which outlines how the Site will be progressively rehabilitated back to productive agricultural farmland, consistent with Policy 5.6.5.9. In addition, in compliance with Policy 5.6.4.3, and as directed through pre-consultation comments received from the Municipality of West Grey on June 26, 2025, cumulative impacts have been addressed in relation to traffic, hydrogeology, noise, environment, and air quality. All of these technical reports have concluded that there will be no cumulative effects as a result of the Project.

The Project is an expansion of the existing Redford Pit. In that respect, the Project will utilise, as the primary access, the existing entrance off Concession 4 NDR, which currently serves the Redford Pit. An alternative access point from Allan Park Road will also be available if required. The access and traffic impacts associated with the Project have been evaluated in the Traffic Impact Study, which confirms that the proposed operations will function safely and efficiently within the existing road network. The Project is therefore consistent with policy 5.6.5.2.

Natural Grey

Hazard Lands

7.2 *New development shall generally be directed away from Hazard lands...*

Wetlands

7.3.2.1 *No development or site alterations are permitted within Other Wetlands or their adjacent lands, shown on Appendix B, or as identified by conservation authorities, unless it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.*

Significant Woodlands

7.4.1 *No development or site alteration may occur within Significant Woodlands or their adjacent lands unless it has been demonstrated through an environmental impact study, as per Section 7.11 of this Plan, that there will be no negative impacts on the natural features or their ecological functions. Adjacent lands are defined in Section 7 and 9.18 of this Plan.*

Projects undertaken by a municipality or conservation authority may be exempt from the environmental impact study requirements, provided said project is a public work or conservation project.

Significant Valleylands

7.7.1 *No development or site alteration may occur within Significant Valleylands or their adjacent lands unless it has been demonstrated through an environmental impact study that there will be no negative impacts on the natural features or their ecological functions.*

Fish Habitat

7.9.1 *Development and site alteration are not permitted in Fish Habitat except in accordance with relevant provincial and federal requirements*

Other Natural Features

7.10.1 *Development and site alteration is not permitted within, Significant Wildlife Habitat (including Deer Wintering Yards), and their adjacent lands, unless it has been demonstrated through an acceptable environmental impact study, completed in accordance with Section 7.11 of this Plan, that there will be no negative impacts on the natural features or their ecological functions.*

7.10.2 *no development or site alteration will be permitted within the Habitat of Threatened / Endangered Species adjacent lands except in accordance with provincial and federal requirements. No development or site alteration will be permitted within the adjacent lands to these areas unless it has been demonstrated through an environmental impact study that there will be no negative impacts on the natural features or their ecological functions. The adjacent lands are defined in Section 9.18 of this Plan and through provincial and federal requirements.*

As outlined in the Natural Environment Report, the subject site contains limited natural heritage features, including a portion of non-significant woodland along the northern boundary and

unevaluated wetlands located in the eastern and southeastern corners of the property—both situated outside the proposed extraction area.

The Natural Environment Report also identifies natural heritage features on adjacent lands, including a significant valleyland, fish habitat, and significant wildlife habitat; however, all identified features lie outside the proposed extraction limits and will be appropriately protected through the implementation of setbacks, vegetated buffers, berms, and erosion and sediment control measures. Furthermore, the proposed extraction will remain above the water table, further reducing potential environmental impacts.

These measures collectively ensure there will be no negative impacts on natural features or their ecological functions. The Project is therefore consistent with the natural heritage protection objectives of Section 7 (Natural Grey) of the County OP.

Overall, considering the above, it is considered the granting of permits for the Project will be consistent with the relevant provisions of the County OP.

2.4 Municipality Of West Grey Official Plan, 2012

The West Grey OP is the local planning document which provides a vision, land uses, and policies to direct growth and development at the lower-tier municipal level.

The *Municipality of West Grey Official Plan 2012* only relates to the settlement areas of Durham and Neustadt. Given the Site is not located within these settlement areas, the West Grey OP is not relevant to the Project and the above County OP policies are relevant instead. The West Grey OP is therefore not considered any further in this report.

2.5 Municipality of West Grey Zoning By-Law, 37-2006

The Zoning By-law is a legal document which implements the Official Plan through regulations affecting the construction, manufacturing, extraction, and other implementation considerations for mineral resource removal.

The subject lands are zoned 'Agricultural (A1)', with a small area in the southeastern corner zoned 'Natural Environment (NE)'. A licensed sand and gravel pit operation is not a use permitted within this zone, and therefore, a Zoning By-law Amendment to the Municipality of West Grey is required to enable the Project.

The proposed amendment is to rezone the lands identified as the 'Proposed Licence Area' in Figure 3 below, from its current 'Agricultural (A1)' zoning to 'Extractive Industrial (M4)'. The permitted uses within the 'Extractive Industrial (M4)' zone include "*A licensed extractive pit or quarry under the Aggregate Resources Act...*". The Site also complies with the minimum lot area (2 hectares) and frontage (30 metres) requirements stipulated in Section 27.2, and the operation will be designed to comply with the setback requirements stipulated in Section 27.3 of the West Grey ZB.

See Appendix B for a copy of the draft Zoning By-law Amendment and Schedule.



Lands to be rezoned from 'Agricultural (A1)' to
'Extractive Industrial (M4-XX)'

Figure 3: Proposed Licence Area that will be rezoned to 'Extractive Industrial (M4)'.

2.6 Overall

As detailed in Section 2 of this Report, it is considered that the Project is in keeping with the policies of the relevant planning documents, and therefore represents an appropriate use of land in terms of the *Planning Act*.

3.0 Aggregate Resources Act Summary Statement

Walker Aggregates Inc. is applying for a Class “A” Pit Above Water licence under the *Aggregate Resources Act*, and a Zoning By-law Amendment under the *Planning Act* to permit extraction, processing, and shipping of sand and gravel resources located at North ½ of Lot 20, Concession 5 NDR, Geographic Township of Bentinck.

A description of the proposed sand and gravel operation is outlined in full in Section 1.2 of the Planning Justification Report for the Planning Act application.

3.1 Plans and Reports Supporting Licence Application

3.1.1 Technical Reports

The licence application consists of a Site Plan and a number of technical reports as required by the Aggregate Resources of Ontario: Technical Reports and Information Standards August 2023.

The following technical reports are provided to fulfill the study requirements of the ARA relevant to Class “A” licence applications.

It is noted that each report has been prepared by a suitably qualified individual, whom have stipulated their qualifications and experience within the report.

Section of Summary Statement	Technical Report Provided
2.1 – Maximum Predicted Water Table Report	Redford Pit Expansion Combined Level 1 and 2 Hydrogeological Assessment, July 22, 2025 (prepared by Kimberly Gardner, B.Eng., EIT, and Alicia Kimberly, M.Sc., P.Geo of Tatham Engineering Limited)
2.2 - Natural Environment Report	Natural Environment Report – Level 1 and 2, August 7, 2025 (prepared by Taylor Wynia of SBA, Hon BSc Ecologist/Herpetologist of Skelton Brumwell & Associates)
2.3 - Cultural Heritage Report	Stage 1-2 Archaeological Assessment, April 25, 2025 (prepared by Marilyn Cornies, MCM Professional Archaeologist Licence #P038 of Amick Consultants Limited) and Stage 3 Archaeological Assessment, July 2025 (ongoing) (Prepared by Archaeological Research Associates Ltd)
2.4 – Agricultural Impact Assessment	Agricultural Impact Assessment for Redford Pit Expansion, June 2025 (prepared by Sean Colville, B.Sc., P.Ag., and John Liotta, B.Sc.Env., P.Ag., of Colville Consulting Inc.).

2.5 – Water Report	<i>Not Applicable – the proposal is for a Class A pit above water with no excavations within 1.5 metres above the maximum predicted water table.</i>
2.6 – Blast Design Report	<i>Not applicable – proposal does not involve blasting.</i>
2.7 – Noise Assessment Report	Noise Impact Assessment, July 22, 2025 (prepared by Danielle Mota, BEng, EIT and Corey Kinart, MBA, INCE, P.Eng of HGC Consulting)

In addition to the required studies, a Traffic Impact Study, and Air quality memo and Best Management Practices Plan (“BMPP”) was prepared.

The Traffic Impact Study, prepared by Skelton Brumwell & Associates (July 23, 2024), evaluated the anticipated transportation impacts of the pit expansion operation to assesses whether the existing local road infrastructure can accommodate the projected truck traffic and whether any upgrades or mitigation measures are required to ensure safe and efficient operation. Its conclusions are summarised in Section 1.4.5 of the Planning Act application.

The Air Quality memo and BMPP assessed potential air quality impacts resulting from the Project and in combination with surrounding aggregate operations. Its conclusions are summarised in Section 1.4.7 of the Planning Act application.,

3.1.2 Site Plans

The following Site plans have also been prepared:

- Existing Features – Drawing number 3581 - 1 of 5;
- Operational plan - Drawing number 3581 - 2 of 5;
- Technical Recommendations - Drawing number 3581 - 3 of 5;
- Cross-Sections & Progressive Rehabilitation Plan - Drawing number 3581 - 4 of 5; and
- Final Rehabilitation Plan - Drawing number 3581 - 5 of 5;

3.2 Summary Statement: Required Information

According to the ARA standards, in addition to the above-mentioned technical reports, all applicants for a Class A licence must complete and submit a summary statement that contains the following information:

1.1	<i>The agricultural classification of the proposed site, using the Canada Land Inventory classes. For any lands being returned to agriculture use as part of rehabilitation, the proposed rehabilitation techniques must be identified.</i>
1.2	<i>Applicable planning and land use considerations that are relevant on or adjacent to where the proposed site will be located, such as provincial or Crown land plans/policies and municipal planning documents.</i>
1.3	<i>If the proposed site is in a source protection area under the Clean Water Act, identify activities proposed at the site that are drinking water threats set out in applicable source</i>

	<i>protection plans, and provide details of how relevant source water protection policies will be followed and associated mitigation measures that will be implemented</i>
<i>Summary statements for applications for a Class A licence must also include the following information</i>	
1.4	<i>The quality and quantity of aggregate on site</i>
1.5	<i>The main haulage routes and proposed truck traffic to and from the site as well as, applicable entrance permit</i>
1.6	<i>The progressive and final rehabilitation and the suitability of the proposed rehabilitation having regard to adjacent lands</i>

An assessment of the application against these standards, is provided in the subsections below.

3.2.1 Agricultural Classification of the Site – Standard 1.1

An Agricultural Impact Assessment was prepared for the Project by Colville Consulting Inc. As detailed in Section 5.5.2 of this assessment:

“the majority of the Subject Lands are mapped as the CLI Class 3FM Sargent Loam (96.68%), and to a lesser extent the CLI Class 4W Gilford Loam (2.71%) and the CLI Class 5I Bottom Land soils (0.61%).

CLI Class 3FM soils have moderately severe limitations for common field crop production due to low natural fertility and moisture deficiency, respectively. CLI Class 4W soils have severe limitations for common field crop production due to the presence of excess water. CLI Class 5I soils have very severe limitations for common field crop production due to inundation by streams or lakes.”

The conclusion reached within the AIA determined that

“the proposed extraction will result in a minimal loss of approximately 0.72 ha of prime agricultural lands. The temporary loss of prime agricultural lands (12.26 ha) and the permanent loss of approximately 0.72 ha of prime agricultural lands are expected to have a negligible impact on the Agricultural System in the area.”

Ultimately, the implementation of mitigation methods, notably, the progressive rehabilitation to return the subject lands to a similar agricultural condition upon completion of the extraction activity, will ensure the proposed Redford Pit expansion operation will have minimal effect on the agricultural land base of the Site and surrounding land uses.

In terms of rehabilitation, a rehabilitation plan (including cross-section drawing) has been submitted as part of the application to outline how the extraction site will be restored. The proposed rehabilitation generally involves backfilling, recontouring, and re-grassing disturbed areas to allow the land to be returned to a pasture use.

3.2.2 Planning and Land Use Considerations – Standard 1.2

The proposal represents good planning and is consistent with the relevant planning policy documents, as has been assessed in full in section 2.0 of the Planning Justification Report for the Planning Act application.

3.2.3 Source Water Protection – Standard 1.3

The Site is located within a Significant Groundwater Recharge Area and a Highly Vulnerable Aquifer; however, the proposed activities do not include any significant drinking water threats as identified in the Source Protection Plan for the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Region. Additionally, the Combined Level 1 and 2 Hydrogeological Assessment prepared by Tatham Engineering Limited confirms the estimated water table elevation at the Project Site—specifically within the proposed extraction area. This assessment concluded that the high groundwater table across the Site ranges from approximately 288.4 to 289.8 metres above sea level, and the operation will maintain a minimum 1.5-metre separation from this predicted water table, ensuring there are no adverse impacts to source water quality.

3.2.4 Quality and Quantity of Aggregate – Standard 1.4

The proposed Redford Pit expansion is located within an area designated as an “Aggregate Resource Area” on Schedule B of the Grey County OP. As noted in the Hydrogeological Study undertaken by Tatham Engineering, the Site lies within the physiographic region known as the Horseshoe Moraines, and is characterized as glaciofluvial outwash sand and gravel deposits with higher hydraulic conductivity due to their coarse textures. The Ontario Geological Survey (OGS) quaternary geologic mapping indicates the Site is within a Pleistocene Glaciofluvial outwash deposit characterized by gravel and sand.

The Site consists of topsoil and overburden covering a mixture of coarse and fine grain sands, with varying contents of silt, gravel, cobbles, boulders, and traces of clay. The topsoil and overburden on the Site averages approximately 0.76 metre thickness.

The average depth of extraction proposed for the Redford Pit expansion is in the order of 6.7 metres, with a maximum depth of extraction of 10.8 metre in localized areas of the site. Based on the average extraction depth over the proposed extraction area of 13.8 hectares, approximately 1,589,000 tonnes of material could be available from extraction.

3.2.5 Haulage Routes and Traffic – Standard 1.5

A Traffic Impact Study was prepared by SBA, in accordance with the ARA Standards, to evaluate the anticipated transportation impacts of the pit expansion operation. The study assesses whether the existing local road infrastructure can accommodate the projected truck traffic and identifies any required upgrades or mitigation measures to ensure safe and efficient operation.

The conclusions made within the Traffic Impact Study have been summarised in section 1.4.5 of the Planning Act application, and provides information with respect to Haulage routes and truck traffic

In terms of access, the Project is an expansion of the existing Redford Pit. In that respect, the Project will utilise, as the primary access, the existing entrance off Concession 4 NDR, which currently serves the Redford Pit. An alternative access point from Allan Park Road will also be available if required.

Ultimately, the Traffic Impact Assessment determined that the existing roading and turning layout is sufficient to support the traffic anticipated from the Redford Pit Expansion operation, and recommends no additional improvements compared to what currently exists.

3.2.6 Proposed Rehabilitation – Standard 1.6

As already detailed in section 3.2.1 of this ARA summary statement, and throughout the Planning Act application, a rehabilitation plan (including cross-section drawing) has been submitted to outline how

the extraction site will be restored. The proposed rehabilitation generally involves backfilling, recontouring, and re-grassing disturbed areas to allow the land to be returned to a pasture use.

4.0 Conclusion

Harold Sutherland Construction Ltd, a subsidiary of Walker Aggregates Inc., is proposing to establish an expansion of the Redford Pit, involving a new licensed operation with an annual extraction limit of up to 300,000 tonnes, occurring to a depth no lower than 1.5 metres above the established water table.

To authorize the pit expansion, the client is applying for a Class “A” Pit Licence (Above Water) under the *Aggregate Resources Act*. Concurrently, a Zoning By-law Amendment application will be submitted to the Municipality of West Grey under the Planning Act to rezone the lands from ‘Agricultural (A1)’ to ‘Extractive Industrial (M4)’ to permit the operation.

The applications are supported by the land use planning analysis, ARA Site Plans, and the associated technical reports referenced in this report. In conclusion, a licence should be issued under the *Aggregate Resources Act* and approval of the of the Zoning By-law amendment under the *Planning Act* should be granted because:

- The Project (being a Class “A” Pit Above Water) is of a type, scale and in a location generally supported under the relevant planning policy documents;
- The sand and gravel resource can be extracted in a manner such that potential environmental and social impacts are minimized and there are no cumulative effects to consider; and
- The Project will be rehabilitated back to rural farmland upon exhaustion of the resource.

All of which is respectfully submitted,
SKELTON, BRUMWELL & ASSOCIATES INC.
per:



Craig Mathieson, BUrbPlan(Hons)
Planner



Michael Wynia, MCIP, RPP
Partner, Senior Ecologist and Planner

Appendix A

Site Plan

Appendix B

Zoning By-law Amendment

THE CORPORATION OF THE MUNICIPALITY OF WEST GREY

BY-LAW NO. 37 - 2006

A BY-LAW TO AMEND ZONING BYLAW 37 - 2006

(WALKER AGGREGATES INC.)

WHEREAS Section 34 of the Planning Act, R.S.O 1990, as amendment, Chapter P. 13, provides for the enactment of zoning bylaws and amendments thereto;

AND WHEREAS the Council of the Corporation of the Municipality of West Grey deems it advisable to further amend Bylaw 37 – 2006 for the Municipality of West Grey as it relates to North ½ of Lot 20, Concession 5 NDR.

AND WHEREAS the Council of the Corporation of the Municipality of West Grey deems that the provisions of this Bylaw conform with the Municipality of West Grey Official Plan, as amended;

NOW THEREFORE, the Council of the Corporation of the Municipality of West Grey enacts as follows:

1. That the zoning maps of Zoning Bylaw 37 – 2006 is hereby further amended by rezoning from “Agricultural (A1)” to “Extractive Industrial (M4)” Zone.

“M4 – XX” (Map XX)

Notwithstanding subsection (1), the parcel of land zoned as M4-XX may be used for a licenced pit above water with an annual extraction limit of 300,000 tonnes.

All other relevant provisions of this Bylaw shall apply.

2. That Schedule “A” attached, does, and shall form part of this Bylaw.
3. That this Bylaw shall come into force and take effect on the date of the passing thereto, subject to the provisions of section 34 of the Planning Act as amended.

BY-LAW READ A FIRST, SECOND AND THIRD TIME AND FINALLY PASSED THIS XX DAY OF MONTH, YEAR.

By-law Number XXXX-XX

A By-law to Amend Zoning By-law No. 37-2006

Schedule "A"



Lands to be rezoned from 'Agricultural (A1)' to
'Extractive Industrial (M4-XX)'