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Meagan Ferris, RPP MCIP  
Manager of Planning and Environment  
County of Wellington Planning & Development  
74 Woolwich Street  
Guelph ON N1H 3T9

Lynne Banks  
Development and Legislative Coordinator  
Township of Puslinch  
7404 Wellington Rd 34, Puslinch ON N0B 2J0

**RE: CBM Aggregates, a Division of St. Marys Cement Inc. (Canada)  
Proposed Aberfoyle South Pit Expansion  
Part of Lots 18-20, Concession 1, Township of Puslinch, County of Wellington  
County of Wellington Official Plan Amendment  
Township of Puslinch Zoning By-law Amendment (Step 2 Pre-Consultation)  
OUR FILE Y321'AB'**

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CBM Aggregates, a Division of St. Marys Cement Inc. (Canada) ('CBM') is applying for an amendment to the County of Wellington Official Plan to permit a below water pit on lands located at Part of Lots 18-20, Concession 1 in the Township of Puslinch.

In accordance with the Township of Puslinch Pre-consultation By-law, CBM is moving forward with Step 2 of the Township's pre-consultation in conjunction with the submission of the County Official Plan Amendment application. The same studies and application materials are being provided to both the County and Township.

The subject lands are municipally addressed as 6947 Concession 2 and are located approximately 2 km west of the CBM Aberfoyle South Main Pit (ARA Licence #5497) which is located at the northwest corner of Concession 2 and Concession Road 7 in the Township of Puslinch. The subject lands are owned by CBM.

The area proposed to be licensed is approximately 44.8 ha (110 ac) with 27.5 ha (67 ac) proposed for extraction. The maximum annual tonnage is proposed to be 1 million tonnes. The subject lands contain approximately 5.5 million tonnes of significant sand and gravel resources within the proposed extraction area.

An application for a Class A Licence has been submitted to the Ministry of Natural Resources and Forestry concurrently with these applications.

The lands are currently used for the production of cash crops, and the dwelling contained on the property is outside of the proposed licensed boundary. The dwelling is currently used as a farm office, and is not currently inhabited.

The subject lands are located within a larger site that is approximately 80 ha in size. The proposed licensed area has been delineated to avoid significant natural features. The proposed extraction area is setback at least 30 m from the adjacent significant wetlands. At its closest point, Mill Creek is located approximately 60 m from the proposed extraction area.

The subject lands will be accessed via a new entrance located at the east end of the subject lands. Truck travel will not be permitted to head west from the subject lands on Concession 2. The current residential entrance to the subject lands will remain in place for access to the house and for farm access. Trucks will not be permitted to use this entrance.

Lands that are not located within the proposed extraction area will be used for setbacks from environmental features and for landscaped visual and acoustic berms. The existing vegetation in these setbacks will be maintained, except where berms are required to be constructed. Along Concession 2, the setback from the road will be 30 m. In addition, there will be a 30 m setback from all significant natural features. A portion of the licensed area at the northern edge of the subject lands is not proposed for extraction or any aggregate-related activities as identified on the site plan. This land would remain under licence to ensure the protection of the identified archaeological resources as requested by MCM and to provide potential additional lands for natural restoration. This area is not proposed to be zoned or designated for extraction. A 30 m setback will be provided from the natural feature (tributary 3) separating this area from the limit of extraction.

There will be no aggregate processing on the subject lands. Materials will be extracted via excavators and dragline (for below water extraction), stockpiled within the extraction area and then shipped, via highway trucks, for processing to the existing Aberfoyle South Pit operation (Licence #5497). Highway trucks will ship materials from the subject lands along Concession Road 2 to the main processing plant at the Aberfoyle South Pit.

The processed aggregate from the Aberfoyle South Pit will then be shipped to market using the existing truck entrance/exit on Concession Road 7, north across Highway 401 to McLean Road and then primarily east to Highway 6. This is the existing truck haul route for the Aberfoyle South Pit.

The proposed hours of operation for the pit are 7 am to 7 pm daily. Shipping hours are restricted to 7 am to 6 pm on weekdays and 8 am to 4 pm on Saturdays.

The lands will be extracted to a maximum depth of approximately 285 masl. The removal of aggregate resources from below the water table will result in the creation of a lake that will be approximately 26 ha in size. Shallow shoreline areas are proposed around the perimeter of the lake.

Approximately 0.3 ha of new wetland habitat will be created in areas of the setback adjacent to the Mill Creek PSW. In addition, approximately 6.7 ha of new forest cover will be created within the 30m setback adjacent to the Mill Creek PSW primarily along the western, southern and eastern setback areas.

At least 35% of the site is proposed to be rehabilitated to forest cover consistent with the rehabilitation requirements in the Growth Plan.

Pre-consultation meetings occurred with the County, Township and Grand River Conservation Authority on September 28, 2021 and July 27, 2023. The technical reports required for the licence and planning applications include the following as confirmed through the pre-consultation process:

<b>Report</b>	<b>Author</b>	<b>Date</b>
Planning Report & Aggregate Resources Act Summary Statement Report	MHBC Planning	November 2023
Natural Environment Report	WSP	November 2023
Water Report (Level 1 and 2)	WSP	November 2023
Maximum Predicted Water Table Report	WSP	November 2023
Stage 1 and 2 Archaeological Assessment	Golder (WSP)	August 2023
Stage 3 Archaeological Assessments (Location 3 and 5)	WSP	June 2023
Noise Assessment Report	WSP	November 2023
Transportation Impact Assessment	TYLin	November 2023
Best Management Practices Plan for the Control of Fugitive Dust	WSP	October 2023
Agricultural Review	MHBC Planning	September 2023
Aggregate Resource Evaluation	WSP	November 2023
ARA Site Plan	MHBC Planning	November 2023

The Ministry of Citizenship and Multiculturalism accepted the Stage 1-2 Archaeological Assessment including its findings in the Provincial Register of archaeological reports.

The following application materials are also being provided with the submission of the County Official Plan Amendment and Step 2 Pre-consultation for the Zoning By-law Amendment application:

1. County OPA Application Form and Fee (\$57,380)
2. Public Consultation Strategy
3. Source Water Protection Screening Form

4. Ownership Information (owned by CBM)
5. MCM Acceptance Letter (Stage 1-2 Archaeological Assessment)

The application materials and technical reports can be downloaded from the following link:  
<https://www.dropbox.com/scl/fo/gjqjr2ypo66vtusb055kb/h?rlkey=rcj3b4ts2nb09pmxhv0dxvjrt&dl=0>

Two hard copies of the application materials including technical reports are each being couriered to the County and Township. The cheque for the County Official Plan Amendment application will be included in the hard copy submission package to the County.

On October 27, 2023, a formal request was submitted and fee paid to the Township to obtain the list of landowners within 120 m of the subject lands. The Township confirmed receipt of the request and indicated it would be provided to the County.

### **Comment Summary – Pre-Consultation Meeting**

On October 31, 2023, the Township provided CBM with a “Comment Summary” from the pre-consultation meeting that occurred on July 27, 2023. The majority of the items raised in these comments had been discussed at the previous pre-consultation meetings that occurred in 2021 and 2023. However, there are a couple items that appear to be new which were not previously raised or identified or matters that require some clarification. The following attempts to address these matters.

#### Terms of Reference

It was requested that the applicant provide a terms of reference for the Environmental Impact Study and Traffic Study. Both of these actions have already occurred.

The terms of reference for the Environmental Impact Study were submitted on October 12, 2021 and updated and resubmitted on September 7, 2023.

The terms of reference for the Traffic Study were submitted on January 27, 2021.

#### Agricultural Impact Study

As discussed in some detail at both pre-consultation meetings and summarized in previous correspondence, a small portion of the subject lands are identified as Prime Agricultural Area by provincial mapping while the subject lands are currently designated Core Greenlands and Greenlands in the County’s Official Plan. As the County has not yet implemented the Agricultural System in their Official Plan, there is no policy requirement for an Agricultural Impact Assessment to be completed with this application. However, it was agreed at those meetings that a review would be provided to consider and address potential impacts on the agricultural system (Agricultural Review, MHBC, September 2023).

## Visual Impact Study

Further to my recent discussions with Meagan, CBM agrees to having this study prepared following the application submission and prior to April 1, 2024. Given this study was never previously discussed or mentioned through pre-consultation, we feel this is a reasonable compromise and it ensures the study can be prepared with sufficient time and attention, and by qualified experts.

## Aggregate Processing and Silt Deposition at Existing Pits

We understand that the Township has raised concerns regarding silt deposition at the existing Aberfoyle South Pit and that this matter may also be raised relative to this proposed application. Soon, CBM will be providing information to the Township and County regarding the silt deposition including an assessment of potential impacts for review and comment.

We look forward to working with the Township and County on these applications. We will ensure that the Township and County are made aware of the status of the ARA application including potential timing for consultation.

Yours truly,  
**MHBC**



Neal DeRuyter, BES, MCIP, RPP

*cc. Courtenay Hoytfox, Township of Puslinch  
Rob Stovel, Stovel and Associates Inc.  
David Hanratty / Steve May, CBM Aggregates  
Heather Melcher, WSP  
Caitlin Port, MHBC*