

Comment Response Matrix - 6678 Wellington Road 34 - File No. D14-ONT

Department/Agency	Comment	Consultant	Response
Township Building Department			
	1.0	GHD	Structural drawings have been submitted. HVAC in process. Septic in progress
	2.0	GHD	In progress.
Valcoustics Canada Ltd.		N/A	N/A
	1.0	N/A	N/A
	1.1	GHD	Refer to Response 1 , Response to Review of Temporary Use By-Law Amendment Application, Valcoustics Canada Limited, prepared by GHD, dated January 9, 2026.
	1.2	GHD	
	1.3	GHD	
	2.0	GHD	Refer to Response 2 , Response to Review of Temporary Use By-Law Amendment Application, Valcoustics Canada Limited, prepared by GHD, dated January 9, 2026.
	3.0	GHD	Refer to Response 3 , Response to Review of Temporary Use By-Law Amendment Application, Valcoustics Canada Limited, prepared by GHD, dated January 9, 2026.
	4.0	GHD	Refer to Response 4 , Response to Review of Temporary Use By-Law Amendment Application, Valcoustics Canada Limited, prepared by GHD, dated January 9, 2026.

	5.0	The figure numbers are not shown on my copy of the AAR. The first figure after the conclusions shows the noise source locations that were modelled. Comparison with the previous version of the model indicates that noise sources S2A and S2B (screening equipment and motor) have been moved from the eastern boundary of the site to a more central location. a. Why were these two sources moved? b. The new locations are further from the receptors to the east of the site (i.e., POR1 to POR4) which could result in lower sound levels at these receptors. Do the updated model locations represent the predictable worst case operating location? c. How was the predictable worst case modelling location determined for each receptor?	GHD	Refer to Response 5 , Response to Review of Temporary Use By-Law Amendment Application, Valcoustics Canada Limited, prepared by GHD, dated January 9, 2026.
	6.0	According to MECP Publication NPC-103, the procedures in SAE J88a should be used to establish the sound emission level from powered mobile equipment. Review of the sound data provided for the front end loader (Caterpillar 973D) in Appendix E, the SAE J88 sound level is 85 dBA at a reference distance of 15 m. This translates to a sound power level of 116.5 dBA which is higher than the 113.2 dBA used in the assessment.	GHD	Refer to Response 6 , Response to Review of Temporary Use By-Law Amendment Application, Valcoustics Canada Limited, prepared by GHD, dated January 9, 2026.
GRCA	1.0	The subject property does not contain any GRCA features. As such, we don't have any comments on this ZBA application. See map attached.	N/A	Acknowledged.
Trace Associates	1.0	The recommendation in Item 1 (2023) has not been addressed. No significant changes to the on-site operations and/or environmental monitoring have occurred since 2023.	GHD	Please refer to Response to Comment No. 1 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
	2.0	The recommendation in Item 2 (2023) has not been addressed. No significant changes to the on-site operations and/or environmental monitoring have occurred since 2023. The Applicant has reportedly committed to install a low-permeability liner system beneath the liquid soil unloading/processing area, the temporary pond, the drainage swale, and the final pond. Water collected in the final pond will be sampled to assess its quality and no new water will be added to the pond until testing results are received. If the water results meet the Table 2 SCS (MOE, 2011), per Ontario Regulation (O. Reg.) 153/04: Records of Site Condition (GO, 2004), the water will be released from the pond "for irrigation of the vegetation in the pit rehabilitation areas" (GHD, 2024b, p. 5). No details have been provided regarding the proposed low-permeability liner system or the protocols and procedures for conducting the sampling of water in the pond or for ensuring that no new water will be added to the pond until the pond is emptied. Also, there is no information on what will happen to the water stored in the pond if the confirmatory sample analytical results exceed the O. Reg. 153/04 Table 2 SCS.	GHD	Please refer to Response to Comment No. 2 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
	3.0	The recommendation in Item 3 (2023) has not been addressed. No significant changes to the on-site operations have occurred since 2023.	GHD	Please refer to Response to Comment No. 3 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
	4.0	The recommendation in Item 4 (2032) has not been addressed. No significant changes to the on-site operations have occurred since 2023.	GHD	Please refer to Response to Comment No. 4 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
	5.0	The recommendation in Item 5 (2023) has not been addressed. Although two new groundwater monitoring wells (MW4-23 and MW5-23) were installed downgradient from the on-site operations, as shown on GHD Figure 3.10 (Appendix B), rather than being installed between the existing wells MW1-20 and MW2- 20, these new wells were installed approximately 250 m downgradient. Furthermore, no wells were installed between the existing monitoring well MW1-20 and the water supply well EX1, and no monitoring wells were installed around the SWM pond.	GHD	Please refer to Response to Comment No. 5 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.

	6.0	The recommendation in Item 6 (2023) has not been addressed. No significant changes to the on-site operations and environmental monitoring have occurred since 2023.	GHD	Please refer to Response to Comment No. 6 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
	7.0	The recommendation in Item 7 (2023) has not been addressed.	GHD	Please refer to Response to Comment No. 7 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
	8.0	The recommendation in Item 8 (2023) has not been addressed.	GHD	Please refer to Response to Comment No. 8 , Response to Review of Temporary Use By-Law Amendment Application, Trace Associates Environmental Comments, dated December 16, 2025.
Nethery Planning	1.0	What is the procedure if an emission or exceedance occurs during operations? Several documents reference different inspection frequencies as some refer to daily monitoring, while the Inspection Form and Design and Operations Report identify weekly inspections. Please clarify the actual monitoring schedule and describe the protocol if a non-compliance event occurs during operations, such as how the township and public will receive this information.	GSP	Please refer to Response to Comment No. 1 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	2.0	Per the Harden Environmental comments, dated November 3, 2025, how will the reporting required by the ECA be shared to the Township and the public at large?	GSP	Please refer to Response to Comment No. 2 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	3.0	In the Design and Operations Report, Section 2.9 discusses stormwater management and introduces a "final pond" for liquid soil settling. This feature is not described or detailed in any other reports. The Township has previously requested design information for this pond. Please provide detailed engineering drawings and a written explanation of its design, function, and how it integrates with the broader stormwater system.	GSP/GHD	Please refer to Response to Comment No. 3 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	4.0	The Design and Operations report does not reference or integrate a current groundwater monitoring plan or any contingency measures (it is for references of the Provincial ECA). Please provide these details and how they address the site's hydrogeological sensitivity.	GSP/GHD	Please refer to Response to Comment No. 4 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	5.0	Please provide an assessment of the proposal against Policy 3.7.1 of the Provincial Planning Statement, with respect to waste management systems.	GSP	Please refer to Response to Comment No. 5 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	6.0	Please provide a detailed explanation of conformity to Sections 4.9.7(a) and Part 5 of the County Official Plan.	GSP	Please refer to Response to Comment No. 6 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	7.0	Which use, under the Section 6.6.3(c) of the Council Official Plan cited as applying to permit the proposal, applies to cover the importation and processing of excess soil and liquid soil? Notwithstanding the existence of the Waste ECA, the importation of liquid soil into mineral aggregate operations has not been permitted since 2022 without a separate approval, calling into question the description of the liquid soil operation as "ancillary."	GSP	Please refer to Response to Comment No. 7 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	8.0	Section 6.6.3 of the County Official Plan is cited for applicability of the use permissions, and the Temporary Use policies (Section 13.4) apply to permit "the temporary use of land for a purpose that is not permitted by the Official Plan or Zoning By-law" (the first Section 2.3.6 of the submitted Planning Justification Report). Is it the applicant's position that the temporary use policies supersede or modify the application of these other policies?	GSP	Please refer to Response to Comment No. 8 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	9.0	Based on the technical comments provided to date, Section 6.6.7 of the County Official Plan has not been adequately addressed in the current submission. Updated technical reports and the inclusion of detailed design drawings may assist in clarifying this policy alignment, and we will provide further assessment at that time.	GSP	Acknowledged.
	10.0	Please provide an assessment of the proposal against Section 11.4.4 of the County Official Plan, with respect to waste management systems.	GSP	Please refer to Response to Comment No. 10 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	11.0	Please confirm whether the shared driveway access from Wellington Road 34 will continue to be shared with the adjacent property and provide documentation of any existing legal agreement governing access, use, and maintenance responsibilities.	GSP	Please refer to Response to Comment No. 11 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.

	12.0	Please provide further explanation as to why this use is being proposed as temporary rather than permanent, particularly given the 10-year time frame proposed. If issues arise through monitoring, it would be the intent to provide that review on performance at the renewal stage (assuming one is requested)? What happens to a partially completed filling operation if the permission is not extended? Also, per Section 1.2 of the Planning Justification Report and the Preconsultation meeting of February 27, 2025, does this mean the site requires 100,000 tonnes of material to complete rehabilitation?	GSP	Please refer to Response to Comment No. 12 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	13.0	Section 2.3.2 of the Planning Justification Report identifies employment and infrastructure servicing benefits. Is this operation more appropriately located within an industrial designation, given the nature and scale of the use?	GSP	Please refer to Response to Comment No. 13 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
	14.0	It appears in the June 2023 zoning sketch supplied that on-site infrastructure associated with the use falls outside of the orange square where the rezoning is targeted. Is that onsite infrastructure inside or outside of the ARA licence #626648 area?	GSP	Please refer to Response to Comment No. 14 , 1st Submission Response Letter, prepared by GSP Group, dated January 13, 2026.
GEI	1.1	The 2021 Stormwater Management Report provided with this submission (dated February 9, 2021) is not consistent with the information provided in the Site Servicing Study (dated June 20, 2025), and does not discuss proposed upgrades, including the proposed temporary pond, and a low permeability liner system beneath the liquid soil unloading/processing area, the temporary pond, the drainage swale, and the final pond.	GHD (Civil)	Refer to Response 1 , Response to Review of Temporary Use By-Law Amendment Application, GEI Consultants, prepared by GHD, dated December 17, 2025
	1.2	The 2021 Stormwater Management Report concludes that no new works or modifications to the site are proposed, but this is not currently correct. As such an updated Stormwater Management Report, with associated Site Servicing and Grading Plan and any necessary engineering details for the liner system and temporary pond, should be provided.		
	1.3	Please ensure that the Stormwater Management Report addresses both quantity and quality considerations related to both liquid soils runoff and stormwater runoff.		
	2.1	The 2024 Design and Operations Report includes a 2022 Stormwater Management Report in Appendix D. Similar to Comment 1 above, the Stormwater Management Report should be updated to reflect the current proposed stormwater management/liquid soils management system, and the updated version should be included in the Design and Operations Report.	GHD (Civil)	Refer to Response 2 , Response to Review of Temporary Use By-Law Amendment Application, GEI Consultants, prepared by GHD, dated December 17, 2025
	2.2	In addition, the Design and Operations Report should be updated to address the conditions and requirements of the Waste ECA.		
Dougan Ecology	1.0	Response to previous ecology comments #1 and 9 (March 14, 2023). We request a formal response to these comments (noted below) demonstrating the proposal is compliant with the County's natural heritage policy: - The Wellington County Official Plan (OP) - Schedule A7 Puslinch - designates the Subject Lands as "Greenlands". Section 5.6.1 of the OP, Permitted Uses, does not allow Commercial Uses in the Greenlands designation and under Section 5.6.4, Zoning, it suggests Greenlands be given a restrictive zoning by a municipal council. Please demonstrate how the proposed Zoning Amendment is compatible with the portions of the site designated as Core Greenlands. - Greenland System features identified in the EIA include: environmentally sensitive areas and significant woodlands. Floodplain and wetlands are also present on abutting lands owned by the County. Please review and demonstrate compliance with all of the applicable policies in Part 5 of the County Official Plan (i.e. 5.4.1, 5.4.3, 5.5.4, 5.5.5).	GHD (Enviro)	Refer to Response 1 , Response to Review of Temporary Use By-Law Amendment Application Ecology Technical Comments, dated January 12, 2026

	2.0	End use Restoration/Enhancement Plan capturing proposed woodland edge enhancements noted in the addendum and additional strategies, as applicable.	GHD (Enviro)	Refer to Response 2 , Response to Review of Temporary Use By-Law Amendment Application Ecology Technical Comments, dated January 12, 2026.
	3.0	Performance Monitoring Plan for silt/exclusion fencing to ensure mitigations (silt/exclusion fencing, barriers) are functioning as intended and repaired where required.	GHD (Enviro)	Refer to Response 3 , Response to Review of Temporary Use By-Law Amendment Application Ecology Technical Comments, dated January 12, 2026.
Harden Environmental	1.0	The ongoing and proposed activity does not fall within the permitted activities for the existing zonin	GHD (Hydro)	Refer to Response Comment No. 1 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	2.0	...the requested activities come with risk to the underlying groundwater resources.		Refer to Response Comment No. 2 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	3.0	No documentation confirming that mitigation measures to prevent contamination of the water resources have been constructed.		Refer to Response Comment No. 3 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	4.0	The Township and County adopted the Paris and Galt Moraine Policies to protect the groundwater resources lying thereunder. The Paris and Galt Moraine Policy 4.9.7.1 stated objective is to protect moraine processes and features in order to maintain and where possible restore and enhance groundwater and surface water resources.		Refer to Response Comment No. 4 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	5.0	The proposed development comes with a risk of contaminating groundwater resources as evidenced by the detailed groundwater monitoring requirements of the proposed activity.		Refer to Response Comment No. 5 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025.
	6.0	The underlying geological formations are permeable, the only available water supply are the groundwater aquifers and despite all historical monitoring and required future monitoring, the requested activity involves the offloading of untested sediment/water slurries. It remains our opinion that the hydrogeological setting is inappropriate for this activity.		Refer to Response Comment No. 6 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	7.0	The increase in chloride concentration in MW1-20 is a good indicator that contaminants easily transport from the soil deposition area to the water table. The natural sandy (and gravelly) soils do not provide any significant attenuation for contaminants and also provide for relatively rapid movement to off-site...		Refer to Response Comment No. 7 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025.
	8.0	The natural sandy (and gravelly) soils do not provide any significant attenuation for contaminants and also provide for relatively rapid movement to off-site given the significant hydraulic gradient observed at the site (more than nine metres of hydraulic potential change from MW3-20 to MW4-23).		Refer to Response Comment No. 8 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	9.0	Furthermore, the soil is destined for final storage in the adjacent pit where sand and gravel has been removed to within 1.5 metres of the water table (and is exposed in several small pit ponds).		Refer to Response Comment No. 9 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	10.0	The Ministry of Environment, Conservation and Parks has issued Environmental Compliance Approval Number A-500-42778388045 to allow for the offloading of up to 125 tonnes of waste per day and allows for the storage of 440 cubic metres of liquid waste contained in lined swales and ponds and 525 tonnes of other waste including dried soil and process derivatives.		Refer to Response Comment No. 10 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
	11.0	The 25 June 2024 Trigger Response Plan as referenced in the ECA only requires the notification of the MECP of exceedance of a Table 2 Standard. There is no recommendation for immediate clean-up.		Refer to Response Comment No. 11 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025.

	12.0	<p>The ECA adopted the Trigger Response Plan and added that a Groundwater Trigger Mechanism and Contingency Plan that is protective of drinking water be prepared after 2 years of groundwater sampling and shall be prepared in accordance with the following:</p> <ol style="list-style-type: none"> 1. The document shall include a proposal for site-specific groundwater trigger threshold values for parameters of concern in accordance with the Ministry's Guideline B-7 document noted above 2. The document shall include proposed trigger mechanisms and contingency measures for the Site. Once approved by the District Manager, trigger threshold values, trigger mechanisms and contingency measures shall be incorporated into the groundwater monitoring plan for the Site 3. No modifications shall be made to the Groundwater Trigger Mechanism and Contingency Plan unless permitted through an amendment to this Approval <p>The Design and Operations report does (not)? include details of groundwater or surface water monitoring, nor does it refer to a monitoring plan or contingency</p>	N/A	Refer to Response Comment No. 12 , Response to Review of Temporary Use By-Law Amendment Application, Hydrogeological Comments, prepared by GHD, dated December 16, 2025
County of Wellington	1.0		GSP	No response required.
	2.0	Within the County of Wellington Official Plan, the subject lands are located within the Rural System on lands that are designated as Secondary Agricultural and Greenlands. The subject lands are also subject to the policies related to Paris Galt Moraine. It is further noted that the subject lands are immediately adjacent to the County owned lands, including Little Tract, and have direct frontage and access onto Wellington Road 34.	GSP	
	3.0	<p>Within the Official Plan, Section 13.4 Temporary Use By-laws allows for local Councils to consider the temporary use of land for a purpose that is otherwise prohibited by the Official Plan or Zoning By-law, provided the temporary use by-law does not exceed three years, and subject to Council having regard for the following six key items noted below:</p> <ul style="list-style-type: none"> • the likely duration • compatibility • the adequacy of services • access and parking • impact assessment • general conformity with this Plan 	GSP	
	4.0	It is understood that the Township has retained consultants to review the subject proposal, including environmental impacts and hydrogeological impacts. The Township's consulting ecologist will need to be satisfied that Part 5 of the Official Plan is adequately addressed, including no negative impacts on adjacent natural features, and the Township's consulting hydrogeologist will need to be satisfied that the policies related to the Paris Galt Moraine Policy Area (Section 4.9.7) and other applicable groundwater policies are generally conformed with.	GSP	
	5.0	It is noted that a previous application for a Zoning By-law amendment was proposed on the subject lands for the same use under the small-scale provision under the Secondary Agricultural policies. As this proposal is now for a temporary use by-law, the Township will need to be satisfied that this use meets the policies set out in Section 13.4, including that the use is likely to cease, is compatible, impacts have been appropriately mitigated and that general conformity with the Official Plan has been addressed.	GSP	
	1.0	The Township should also consider the comments provided under separate cover by Wellington Source Water Protection and County Roads.	GHD (Hydrogeo)	Noted.

Source Water Protection	2.0	<p>WSWP request that the owners or their agents submit the following plans, reports or documentation to the satisfaction of the Township Risk Management Official:</p> <ol style="list-style-type: none"> 1. Documentation that a flow meter will be installed, and its data will be available upon request for review by the Township and Risk Management Office. 2. Documentation that any unused wells are decommissioned as per Ontario Regulation 903. If no unused wells are present on the property, please confirm this in a future submission. 3. Documentation of all provincial approvals required for this property, including Environmental Compliance Approval and Permits to Take Water. 	GHD (Hydrogeo)	<p>Refer to Response WSWP Comments No. 3, 4 & 5, Response to Review of Temporary Use By-Law Amendment Application, Wellington Source Water Protection, prepared by GHD, dated December 16, 2026</p>
	3.0	<p>The above report indicates that this site is not located within an Issue Contributing Area for Chloride, which is incorrect. Please refer to the Grand River Source Protection Plan, approved July 29, 2025, which confirms the Chloride ICA. Source Protection Plans are amended prior to Official Plans and Zoning Bylaws. Please update the mentioned report with the correct vulnerability scoring for this property.</p>	GHD (Hydrogeo)	<p>Refer to Response WSWP Comment No. 6, Response to Review of Temporary Use By-Law Amendment Application, Wellington Source Water Protection, prepared by GHD, dated December 16, 2026</p>