



**PREPARED FOR:**

**Township of Zorra**  
**163 Brock Street, PO Box 189**  
**Thamesford, Ontario**  
**N0M 2M0**

File no. 10169B

**November 2025**

# **SUMMARY REPORT**

## **Harrington Pit Application**

Township of Zorra



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# 1.0 Summary

On behalf of the Township of Zorra, we have reviewed the submitted Harrington Pit Zoning By-law amendment application by 1000394952 Ontario Inc. (Application #ZN5-24-09). The application proposes to re-zone the lands located at 316829 31st Line from General Agricultural (A2) to Aggregate Industrial (ME).

The purpose of this report is to review and summarize the application materials provided by the County and provide detailed comments on the Application for Township and County Staff consideration.

Our review is based on the following Application documents provided to us by County Staff:

- Summary Report, July 2024
- Hydrogeologic Assessment, June 2024
- Natural Environment Report, June 2024
- Archaeological Assessment (Stage 1 and 2), August 2023
- Noise Assessment Report, July 2024
- Geotechnical Engineering Report, June 2023
- Traffic Impact Study, 2024
- Summary Report, Revised March 2025
- Technical Response to a Request for Additional Monitoring Well Installation and Water Table, March 2025
- Woodland Restoration and Rehabilitation Plan, June 2025
- Revised Recommendations and Analysis, Noise Feasibility Study, July 2025

Based on our review, the following is a summary of our comments and recommendations for staff consideration:

1. Confirm that the provincial review agencies (MNR, OMAFA, MCM, MECP) have no outstanding comments or concerns with the Technical Reports and Site Plans submitted with the ARA Application.
2. Request that the applicant complete a Planning Justification Report and an Agricultural Impact Assessment.
3. Confirm that the Township has entered into an Agreement, or is prepared to enter into an Agreement, with the Applicant to permit a 0.0 m setback along the common shared Licence Boundary.
4. Request that the Applicant update the Site Plans to include the following information:
  - a. The July 2025 maximum water table elevations and the maximum depth of extraction;
  - b. All trigger requirements from the Woodland Restoration and Rehabilitation Plan; and
  - c. A re-labelling of the "Optional Storage Berm" adjacent to the 31st line to a required Visual Berm.
5. Consider re-zoning the environmental features on the property, outside of the proposed extraction boundary to the Open Space (OS) Zone.

A detailed list of our comments and recommendations is included in Section 6.0.

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# 2.0 Proposal

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## 2.1 Project Description

A Zoning By-law Amendment Application was submitted to the Township of Zorra in September 2024 by 1000394952 Ontario Inc. (the "Applicant") to re-zone a portion of the property located at Part of Lot 30, Concession 1, in the Township of Zorra from General Agriculture (A2) to Aggregate Industrial (ME; Application #ZN5-24-09). In conjunction with the amendment application, a Class A *Aggregate Resources Act* ("ARA") Licence application for a pit above the water table was submitted to the Ministry of Natural Resources ("MNR"). The "Harrington Pit" is proposed to have a Licence boundary of 27.8 hectares and an extraction area of 24.4 hectares. In this Report, "subject lands" refers to the area to be licenced under the ARA. There are approximately 5.0 million tonnes of aggregate resources available on the subject lands. The annual tonnage of aggregate to be removed from the site is a maximum of 500,000 tonnes.

The Harrington Pit is located at 316829 31st Line, to the north of the Township's Robinson Pit (Licence #602642) and to the northeast of several active pits owned by Amrize Canada Inc., St. Marys Cement Inc. (Canada) and R.M. Matheson Farms Limited. The subject lands are located directly to the southwest of the Harrington Settlement area according to Schedule Z-1 of the County of Oxford Official Plan. Natural areas, agricultural lands and rural residential uses surround the subject lands.

A significant woodland is located to the west of the proposed pit, of which 4.0 ha is proposed to be extracted as part of the operation. A woodland restoration and rehabilitation plan has been prepared to replace the woodland in conjunction with the phased operation and progressive rehabilitation.

The majority of the subject lands contain Class 2 soils and are therefore considered Prime Agricultural Lands. The subject lands are designated as 'Agricultural Reserve' in the County of Oxford Official Plan which identifies the area as a Prime Agricultural Area. The Subject Lands are currently in agricultural use and contain a house, barn and detached garage.

The Harrington Pit will include processing activities of the extracted material, with proposed portable crushing and screening plants. The processed material will be hauled and shipped through the proposed upgraded entrance/exit along the north boundary of the site onto County Road 28. It is our understanding that the County and Township reviewed the Traffic Impact Study (R.J Burnside & Associates Limited, 2024) and are satisfied with its findings and conclusions. The applicant will be required to obtain a permit from the road authority to construct the proposed entrance/exit up to the required standards.

Through progressive and final rehabilitation activities, the lands are proposed to be restored to an Agricultural Condition on the final pit floor, a 4.0 ha woodland along the western Licence boundary, and 3:1 slopes that will be revegetated to create grassland/meadow habitat. Tree and shrub nodes will be planted along the south boundary of the licenced area as indicated on the Rehabilitation Page (Page 5) of the ARA site plan.

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# 3.0 Technical & ARA Site Plan Review

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## 3.1 Technical Review

The Applicant submitted the following documents in support of the Zoning By-law Amendment application in September 2024:

- Summary Report, July 2024
- Hydrogeologic Assessment, June 2024
- Natural Environment Report, June 2024
- Archaeological Assessment (Stage 1 and 2), August 2023
- Noise Assessment Report, July 2024
- Geotechnical Engineering Report, June 2023
- Traffic Impact Study, 2024

In response to the Natural Environment and Hydrogeology comments from the Ministry of Natural Resources ("MNR"), the Applicant submitted the following updated materials in July 2025:

- Summary Report, Revised March 2025
- Technical Response to a Request for Additional Monitoring Well Installation and Water Table, March 2025
- Woodland Restoration and Rehabilitation Plan, June 2025
- Revised Recommendations and Analysis, Noise Feasibility Study, July 2025

The following review is based on the requirements of the *Aggregate Resources of Ontario: Technical Reports and Information Standards*, Ontario (2020). As MHBC does not have the expertise to review the results and methodology of technical reports related to the natural environment, hydrogeology, noise and archaeology, we have only reviewed the reports to ensure that all technical recommendations have been incorporated into the Site Plans.

### **Recommendation:**

1. Confirm that the provincial review agencies (MNR, OMAFA, MCM, MECP) have no outstanding comments or concerns with the Technical Reports submitted with the ARA Application

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## **Summary Report, Harrington McAvan Ltd., March 2025**

A Summary Statement is a requirement for a Class A Licence Application under the ARA. Generally, a Planning Justification Report is also required by the Municipal approval authority for the *Planning Act* Applications to appropriately address consistency/conformity with the applicable planning policies and legislation.

Standard 1.2 of the Provincial Standards requires applicable planning and land use considerations, including provincial and municipal planning documents, be analyzed in the Summary Report. The Summary Report considers the previous 2020 version of the Provincial Policy Statement (“PPS”). In addition, justification and analysis of the municipal planning policies from the County of Oxford and Township of Zorra have only been considered at a very high level. A Planning Policy consistency/conformity analysis has not been included.

**Recommendation:**

1. Request that the Applicant provide a Planning Justification Report demonstrating consistency with the PPS 2024 and the County of Oxford Official Plan.

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## **Hydrogeologic Assessment, Groundwater Science Corp., June 2024**

The Hydrogeologic Assessment provides the required information based on the Provincial Standards for technical reports. It appears that all required information from the Provincial standards is included and that all recommendations from the assessment have been incorporated into the Site Plans.

### **Technical Response to a Request for Additional Monitoring Well Installation and Water Table, March 2025**

A technical response to comments from the Ministry of Natural Resources to install two additional monitoring wells was prepared in January 2025 by the Applicant’s consultant – Groundwater Science Corp (March 27, 2025).

As a result of the new monitoring well installation, a more accurately projected maximum groundwater table was identified in the revised Hydrogeological Assessment.

**Recommendation:**

1. Confirm that MNR has no outstanding comments or concerns with the Hydrogeological Assessment.
2. Based on the revised Maximum Predicted Water Table Elevations presented in Figure 2 of the March 2025 Groundwater Science Corp. Letter, the maximum water table elevations and the maximum depth of extraction on the ARA Site Plan should be revised to ensure that extraction remains 1.5 m above the maximum predicted water table elevation.

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## **Natural Environment Report, Dance Environmental Inc, June 2024 and Woodland Restoration and Rehabilitation Plan, June 2025**

A Natural Environment Report (NER) is a requirement for a Class A Licence Application under the ARA. A woodland restoration plan has been prepared for the Harrington Pit to appropriately rehabilitate the area of the significant woodland proposed for removal during the extraction of the pit. According to the PPS (2024), “*development and site alteration shall not be permitted in significant woodlands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions*” (Policy 4.1.5). Based on our review, it can be concluded that all technical recommendations

from the report have been incorporated into the site plan and that the report concludes that there should be no negative impacts on the natural heritage features or their ecological functions.

**Recommendations:**

1. Confirm that MNR has no outstanding comments or concerns with the Woodland Restoration Plan.
2. The following "Trigger Mechanism" on Page 1 of the Woodland Restoration Plan (June 2025), should be included as a note on the ARA Site Plan:
  - *"Clearing of vegetation in Phases 2a and 2b shall not occur until the monitoring shows that the trees planted in the previous phases (eg. 1a and 1b) have reached a "free to grow" stage. Since the oaks and hickories are equally important to the make-up of the target community, the monitoring should also determine that there are enough (i.e. trees per hectare) oaks and hickories established and healthy in Phases 1 before proceeding to Phase 2a."*

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## **Archaeological Assessment (Stages 1 and 2), August 2023**

Provincial standards require that a Cultural Heritage Report be submitted which must be consistent with the provincial requirements under the *Ontario Heritage Act* and the PPS based on the results of a cultural heritage screening checklist.

An Archaeological Assessment has been submitted as part of the ARA Licence Application. The assessment concludes that no further studies are required for the subject site.

**Recommendations:**

1. None.

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## **Noise Assessment Report, HGC Engineering Limited, July 2024 and Revised Recommendations and Analysis, Noise Feasibility Study, July 2025**

A noise assessment report is required if a new proposed pit operation is located within 150.0 m of a sensitive receptor. The noise assessment report must determine if provincial noise guidelines for stationery and transportation sources can be satisfied if the operation is carried out as proposed in the application.

A Revised Recommendations and Analysis, Noise Feasibility Study (July 2025) was prepared in response to comments from neighbours and the MNR.

All noise mitigation recommendations have been incorporated into the technical recommendations section of the ARA Site Plan.

**Recommendations:**

1. Confirm that MNR has no outstanding comments or concerns with the Noise Feasibility Study and implementation of the required noise mitigation measures on the ARA Site Plan.

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## ARA Site Plans, Harrington McAvan Ltd, July 2025

The Applicant submitted the revised ARA Site Plans in July 2025 to include the recommendations of the updated application materials. The five pages of the site plans include the required Existing Features Plan; Operational Plan (Phases A and B-D); Sections and Details; and Rehabilitation Plan.

The *Aggregate resources of Ontario: Site plan standards* (2020) are used to prepare site plans for an application for a Class A licence to extract more than 20,000 tonnes of aggregate material annually.

### Recommendations:

1. Confirm that MNR has no outstanding comments or concerns on the ARA Site Plan.
2. Confirm that OMAFA has no outstanding comments or concerns on the Agricultural component of the Rehabilitation Plan.
3. Ensure that the revised Maximum Predicted Water Table Elevations (July 2025) are accurately incorporated into the drawings to ensure that extraction remains 1.5 m above the maximum predicted water table elevation.
4. Add the Trigger requirements from the Woodland Restoration and Rehabilitation Plan onto the Site Plan: *"Clearing of vegetation in Phases 2a and 2b shall not occur until the monitoring shows that the trees planted in the previous phases (eg. 1a and 1b) have reached the "free to grow" stage."*



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## 4.0 Potential Impacts and Considerations for the Adjacent Township Pit

The Township of Zorra owns the licenced Robinson Pit (Licence #602642), located directly south of the proposed Harrington Pit.

The Harrington Pit ARA Site Plan includes references to the Township Robinson Pit through Site Plan Variances.

Site Plan variances are permitted exemptions to the operational requirements outlined in O.Reg 244/97.

The following variances are included on the Harrington Pit Site Plan:

- The 15.0 m required setback along the southern Licence boundary of the Harrington Pit with the Township pit is reduced to 0.0 m per agreement with the south licensee.
- Stockpiling may occur along the south boundary per agreement with the adjacent licensee.
- Fencing will not be maintained along the southern boundary per agreement with the licensee.

Based on the inclusions of these variances on the ARA Site Plan, the Township should confirm that the Applicant has entered into an Agreement with the Township to permit a shared common licence boundary and a reduced setback from 15.0 m to 0.0 m.

The ARA Site Plans of the Township's Robinson Pit have not been examined as part this review. We assume that the Township pit includes a 15.0 m setback along the northern Licence Boundary. Should the Township wish to reduce this setback to 0.0 m to maximize resource recovery and allow for comprehensive rehabilitation with the proposed Harrington Pit, then a Site Plan Amendment will be required for the Township Pit to reduce the northern setback limit to 0.0 m.

### **Recommendations:**

1. Confirm that the Township has entered into an Agreement with the Applicant to permit a 0.0 m setback along the common shared Licence Boundary. Or alternatively, that Township is prepared to enter into an agreement for this change.
2. Consider submitting a Site Plan Amendment for the Township Pit to reduce the northern 15.0 m to 0.0 m to maximize resource extraction and allow for comprehensive rehabilitation between the two pits. Further investigations may be required to confirm that no significant natural heritage features are present in the setback area. This should occur post-Harrington Pit licence approval so that it would be a minor amendment.

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# 5.0 Policy Review

The proposed Harrington Pit Zoning By-law Application is required to be consistent, conform, and meet the provisions of the following documents:

- Provincial Planning Statement (2024);
- County of Oxford Official Plan (2023 Consolidation); and
- Township of Zorra Zoning By-law No. 35-99.

The following is an initial planning analysis of the proposed application based on a review of the Application materials provided by the County.

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## 5.1 Provincial Planning Statement, 2024

The PPS is a policy-led planning approach that recognizes the complex inter-relationship among environmental, economic and social factors in land use planning. The PPS supports a comprehensive, integrated and long-term approach to planning and recognizes linkages among policy areas.

The PPS recognizes that the Province's natural heritage resources, water, agricultural lands, mineral aggregate resources, cultural heritage and archaeological resources provide important environmental, economic and social benefits.

The wise use and management of these resources over the long term is a key provincial interest. The province must ensure that its resources are managed in a sustainable way to protect essential ecological processes and public health and safety, minimize environmental and social impacts, and meet its long-term economic needs.

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## Consistency Analysis

Chapter 2 (Building Homes, Sustaining Strong and Competitive Communities) and Chapter 4 (Wise Use and Management of Resources) of the PPS have relevance to the proposed Harrington Pit application based on our review.

### 2.5 Rural Areas in Municipalities

Policy 2.5.1 of the PPS provides that "Healthy, integrated and viable rural areas should be supported by: a) building upon rural character, and leveraging rural amenities and assets." The subject lands are located in a rural area of the Township of Zorra. The proposed Harrington Pit will extract sand and gravel resources to supply construction projects in the area.

### 4.1 Natural Heritage

The PPS directs that "natural features and areas shall be protected for the long term" (policy 4.1.1). In addition, policy 4.1.2 requires that "the diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features."

Policy 4.1.5 of the PPS requires that development and site alteration shall not be permitted in significant woodlands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. The Harrington pit proposes to extract 4.0 hectares of significant woodland. The Woodland Restoration Plan proposes to compensate for the removal of the Significant Woodland with a phased 1:1 woodland replacement and restoration plan that is implemented on the ARA Site Plan. Planting parameters, monitoring requirements, and trigger mechanisms are included in the Woodland Restoration Plan to ensure the successful replacement of the Significant Woodland.

Additional trees and shrubs are proposed to be planted along the southern Licence Boundary to compensate for the removal of the trees located along the southern Licence Boundary and to create a linkage with off-site environmental features.

The Natural Environment Report and Woodland Restoration Plan Report conclude that there will be no negative impacts to the significant woodland through the implementation of the required mitigation measures and Woodland Restoration and Rehabilitation Plan included on the ARA Site Plan.

#### 4.3 Agriculture

The extraction of mineral aggregate resources is permitted in prime agricultural areas (4.3.5.1).

PPS Policy 4.3.5.2 requires that, *"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."*

Based on the information provided to us by the County, no Agricultural Impact Assessment has been submitted as part of the Zoning By-Law Amendment Application materials. In addition, no Agricultural mitigation measures are included on the Harrington Pit ARA Site Plan to minimize and mitigate the potential impact of the pit operation on the Agricultural System.

#### 4.5.2 Protection of Long-Term Resource Supply

The extraction of mineral aggregate resources shall be undertaken in a manner which minimizes social, economic and environmental impacts, in accordance with policy 4.5.2.2 of the PPS. The technical studies submitted with the Application assess the impacts of the proposed operation and outline recommendations to reduce and mitigate potential impacts. The Recommendations of the technical studies have been included on the ARA Site Plan. See Section 3.1 of this Report for a review of the technical reports submitted in support of the Harrington Pit application.

#### 4.5.3 Rehabilitation

The following policies are relevant rehabilitation policies to be analyzed for the Harrington Pit application:

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

The majority of the proposed pit will be rehabilitated to an agricultural condition and will also include ecological restoration components. This is an appropriate subsequent land use based on the surrounding approved land use designations.

#### 4.5.4 Extraction in Prime Agricultural Areas

- 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.*

The Rehabilitation Plan for the Harrington Pit includes restoration of the pit floor back to an agricultural condition.

#### 4.6 Cultural Heritage and Archaeology

The following policies are particularly important for the proposed Harrington Pit:

- 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.*

Archaeological Assessments (Stage 1 and 2) were conducted for the subject lands and resulted in the recovery of one location of archaeological materials which was found to be no further cultural heritage value or interest.

#### **Recommendations:**

1. To ensure that the Applicant has satisfactorily demonstrated consistency with the “no negative impacts” test for the removal and replacement of the 4.0 ha significant woodland, we recommend that the County confirm that all MNR's comments on the NER and Woodland Restoration Plan have been addressed.
2. In accordance with PPS 2024 Policy 4.3.5(2), request the applicant to complete an Agricultural Impact Assessment to assess potential impacts of the new non-agricultural use on the agricultural system.
3. Confirm that the provincial review agencies (MNR, OMAFA, MCM, MECP) have no outstanding comments or concerns with the Technical Reports submitted with the ARA Application.
4. Prior to recommending approval of the Zoning By-Law Amendment Application, the Township should confirm that all comments from MNR and OMAFA on the Rehabilitation Plan have been addressed.

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## **5.2 County of Oxford Official Plan, 2023 Consolidation**

The County of Oxford Official Plan (the “Official Plan”) was adopted by the County of Oxford on December 13, 1995, and approved by the Ministry of Municipal Affairs and Housing on March 31, 1997.

The County of Oxford Official Plan recognizes the significant reserves of mineral aggregate resources and presence of high-quality aggregate deposits as an important component of the rural economy.

Further, the Official Plan also notes the important role the County plays in Ontario's mineral aggregate resource.

The Official Plan designates the subject lands as 'Agricultural Reserve' on Schedule Z-1, Township of Zorra Land Use Plan. Lands designated as 'Agricultural Reserve' contain lands most suitable for agricultural production and are recognized as prime agricultural areas in accordance with section 3.1.3 of the Official Plan. Appendix 2-1, Mineral and Petroleum Resources, identifies the subject lands within a 'Sand and Gravel Resource Area.'

## Conformity Analysis

### 3.1.4 Policies for Agricultural Uses in the Agricultural Reserve

Sand and gravel extraction and ancillary uses are permitted as interim uses in the 'Agricultural Reserve' designation in accordance with policies in Section 3.4 of the Official Plan (policy 3.1.4.1).

In addition, the Official Plan requires that extraction sites be rehabilitated in a manner that promotes land use compatibility, takes into consideration surrounding land uses and land use designations, mitigates negative impacts to the extent possible and ensures a net environmental gain is achieved. Extraction sites shall be rehabilitated to an agricultural condition as a first priority and proposed after-uses shall be in conformity with the applicable policies of the relevant land use designation. Comprehensive rehabilitation in areas with a concentration of mineral aggregate operations is encouraged and progressive rehabilitation is required.

**Table 1: Official Plan Policy Conformity Analysis**

Policy 3.4.1.1 Strategic Initiatives and Objectives	Conformity Analysis
Orderly Extraction	The recommendations from the Technical Reports have been included on the ARA Site Plan to minimize impacts on adjacent and surrounding uses and to ensure land-use compatibility.
Compatibility with Agriculture	The Rehabilitation Plan for the Harrington Pit is to return the area to a predominantly Agricultural Condition. The pit operation will occur in phases which will ensure that as much land as possible is kept in an Agricultural Condition and that rehabilitation occurs progressively. An Agricultural Impact Assessment has not been submitted to assess potential impacts on adjacent agricultural operations and the agricultural system.
Compatibility with Natural Heritage Systems	The Natural Environment Report and Woodland Restoration and Rehabilitation Plan for the Harrington Pit application conclude that the significant woodlands will be restored following the extraction of the pit. Additional planting is proposed along the southern Licence boundary to re-establish an ecological linkage, and the 3:1 slopes will be seeded with native grasses and flowers to create a naturalized, pollinator habitat. These progressive and final rehabilitation requirements will restore and enhance

	the natural heritage system in a predominantly agricultural area of the Township.
<i>Compatibility with Water Resources:</i>	A Maximum Predicted Water Table Elevation Report was completed and then updated with additional information in July 2025. The report demonstrates that pit operations will remain 1.5 m above the water table. Water monitoring will be ongoing for 3-years to confirm water table elevations.
<i>Compatibility Between Settlement Uses and Aggregate Operations, and;  Minimize Community Impacts</i>	A Noise Impact Study was completed to assess potential noise impact and identify mitigation measures required to ensure that noise levels are kept within MECP requirements. The ARA Site Plan implements the Noise Report recommendations, including: noise berms, shielding around the processing plant, and restrictions on where the crushing plant can be located on-site. In addition, the use of back-up beepers is limited to "white-noise" warning devices. The requirements of O.Reg 244/97 will be implemented, in addition to, best management practices to ensure that dust is controlled on-site. Therefore, the pit operation has been designed to be compatible with the nearby Hamet and surrounding sensitive uses.
<i>Rehabilitation</i>	The Rehabilitation Plan requires the pit to be progressively rehabilitation back to predominately Agricultural Condition with the replacement of the 4.0 ha Significant Woodland. Additional ecological enhancements or replacements are proposed along the southern Licence boundary and the 3:1 side-slopes.
<b>3.4.1.3.2 Development Review Policies</b>	<b>Conformity Analysis</b>
<i>Impacts and Cumulative Impacts</i>	Impacts and cumulative impacts are assessed as part of the completion of the required Technical Studies. Through the implementation of the required mitigation measures, no adverse impacts are expected.
<i>After-Use Priorities</i>	The Rehabilitation Plan back to an Agricultural Condition with restored environmental features, is compatible with the existing land uses in the surrounding area.
<i>Net Environmental Gain</i>	The Significant Woodland and linkages will be restored to the pre-existing condition. Through the removal of invasive species and the naturalization of the 3:1 side slopes with pollinator habitat, the Pit will result in a Net Environmental Gain.
<i>Rehabilitation</i>	The proposed Rehabilitation Plan meets the requirements of the PPS and Official Plan and has been developed in accordance with the Provincial Standards and O.Reg 244/97 requirements.
<i>Licensing Requirements</i>	The Township/County should confirm that MNR, MECP, and the Conservation Authority comments on the

	Application have been appropriately addressed and that there are no outstanding comments or concerns from these review agencies.
<i>Information Required</i>	<p>All of the information required to satisfy the Licence Application requirements has been included. The Township/County should confirm with MNR that all MNR's comments on the Licence Application have been addressed.</p> <p>The Technical Studies submitted with the Application address: traffic, natural heritage, water resources, noise, and archaeology.</p> <p>To further address visual impacts, the Township/County could consider requesting that the applicant install a tree screen along 31<sup>st</sup> Line and re-label the "optional storage berms" located adjacent to 31<sup>st</sup> Line as a required "visual berms". Visual berms and a tree screen adjacent to the 31<sup>st</sup> Line would screen the operation and increase land-use compatibility.</p> <p>Based on our review, the Applicant has not submitted a Planning Justification Report or an Agricultural Impact Assessment.</p>

### Recommendations:

1. To ensure that the Applicant has satisfactorily demonstrated consistency with the "no negative impacts" test for the removal and replacement of the 4.0 ha significant woodland, we recommend that the County confirm that all of MNR's comments on the NER and Woodland Restoration Plan have been addressed.
2. In accordance with County Official Plan Policy 3.4.1.3.2, request the applicant to complete a Planning Justification Report to identify all relevant policies of the PPS 2024 and the Official Plan and complete an assessment and analysis of how the proposal is consistent with the PPS 2024 and conforms to relevant Official Plan policies.
3. In accordance with County Official Plan Policy 3.4.1.3.2, request the Applicant complete an Agricultural Impact Assessment to assess potential impacts of the new non-agricultural use on the agricultural system.
4. Request that the Applicant re-label the "Optional Storage Berm" adjacent to the 31<sup>st</sup> line as a Visual Berm that is required to screen the active phases of the pit operation. A tree screen could also be added in front of the visual berm, adjacent to the 31<sup>st</sup> Line, to mitigate visual impacts and increase land-use compatibility.
5. Confirm that the provincial review agencies (MNR, OMAFA, MCM, MECP) have no outstanding comments or concerns with the Technical Reports submitted with the ARA Application.
6. Prior to recommending approval of the Zoning By-Law Amendment Application, the Township should confirm that all comments from MNR and OMAFA on the Rehabilitation Plan have been addressed.

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## 5.3 Township of Zorra Zoning By-law, 2022 Consolidation

The proposed Harrington Pit is subject to Township of Zorra Zoning By-law No. 35-99 (the "Zoning By-law"). The subject lands are currently zoned 'General Agricultural' (A2) in the Zoning By-law. To permit the Harrington Pit, a Zoning By-law amendment is required to rezone the lands to the 'Aggregate Industrial' (ME) zone.

We have not reviewed the Draft Zoning By-Law Amendment submitted with the Application. Based on our review of the ARA Site Plan and Technical studies, we would suggest that the environmental features on the property, outside of the proposed limit of extraction, be re-zoned to the Open Space Zone (OS)

### **Recommendations:**

1. Consider re-zoning the environmental features on the property, outside of the proposed extraction boundary to the Open Space (OS) Zone.



# 6.0 Summary of Comments & Recommendations

We have completed a review of the Harrington Pit Zoning By-Law Amendment Application materials (November 2024) and the revised/supplementary Application Materials and updated ARA Site Plan (July 2025).

The following table summarizes our comments and recommendations for Township and County Staff consideration:

**Table 2 - Harrington Pit Summary of Comments and Recommendations.**

#	Comments & Recommendation
1.	Confirm that the provincial review agencies (MNR, OMAFA, MCM, MECP) have no outstanding comments or concerns with the Technical Reports or ARA Site Plan submitted with the ARA Application.
2.	In accordance with County Official Plan Policy 3.4.1.3.2, request the applicant to complete a Planning Justification Report to identify all relevant policies of the PPS 2024 and the Official Plan and complete an assessment and analysis of how the proposal is consistent with the PPS 2024 and conforms to relevant Official Plan policies.
3.	In accordance with PPS 2024 Policy 4.3.5(2) and County Official Plan Policy 3.4.1.3.2, request the applicant to complete an Agricultural Impact Assessment to assess potential impacts of the new non-agricultural use on the agricultural system.
4.	To ensure that the Applicant has satisfactorily demonstrated consistency with the “no negative impacts” test for the removal and replacement of the 4.0 ha significant woodland, we recommend that the County confirm that all of MNR's comments on the NER and Woodland Restoration Plan have been addressed.
5.	Confirm that OMAFA has no outstanding comments or concerns on the Agricultural Rehabilitation component of the Rehabilitation Plan.
6.	Confirm that the Township has entered into an Agreement with the Applicant to permit a 0.0 m setback along the common shared Licence Boundary. Or, alternatively, that Township is prepared to enter into an agreement for this change.
7.	Consider submitting a Site Plan Amendment for the Township Pit to reduce the northern 15.0 m to 0.0 m to maximize resource extraction and allow for comprehensive rehabilitation between the two pits. Further investigations may be required to confirm that no significant natural heritage features are present in the setback area. This should occur post licence approval so that it would be minor amendment.
8.	Based on the revised Maximum Predicted Water Table Elevations presented in Figure 2 of the March 2025 Groundwater Science Corp. Letter, the maximum water table elevations and the maximum depth of extraction on the ARA Site Plan should be revised to ensure that extraction remains 1.5 m above the maximum predicted water table elevation.
9.	The following “Trigger Mechanism” on Page 1 of the Woodland Restoration Plan (June 2025), should be included as a note on the ARA Site Plan:

	<i>"Clearing of vegetation in Phases 2a and 2b shall not occur until the monitoring shows that the trees planted in the previous phases (eg.1a and 1b) have reached a "free to grow" stage. Since the oaks and hickories are equally important to the make-up of the target community, the monitoring should also determine that there are enough (i.e. trees per hectare) oaks and hickories established and healthy in Phases 1 before proceeding to Phase 2a."</i>
10.	Request that the Applicant re-label the "Optional Storage Berm" adjacent to the 31st line as a Visual Berm that is required to screen the active phases of the pit operation. A tree screen could also be added in front of the visual berm, adjacent to the 31st Line, to mitigate visual impacts and increase land-use compatibility.
11.	Consider re-zoning the environmental features on the property, outside of the proposed extraction boundary to the Open Space (OS) Zone.

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## 7.0 Closing

MHBC thanks the Township of Zorra for the opportunity to peer review this application to assist the Township with its review and processing of the Harrington Pit Zoning By-law Amendment Application. We trust this review meets the requirements outlined in our Work Plan previously provided to the Township.

Should you require additional information or if we can be of further assistance, please contact the undersigned.

Respectfully submitted,

**MHBC**



Yara Elmahdy, BES  
Planner



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Associate



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Partner