

January 5, 2026

County of Oxford
Community Planning
21 Reeve St
Woodstock, ON N4S 7Y3

Attn: Spencer McDonald, MCIP, RPP
Development Planner

Subject: ZN5-24-09 - Peer Review Summary, Applicant's Response

Thank you for providing the peer review summary report for the proposed Harrington Pit, prepared by MHBC Planning, and dated November 2025. The report included a review of the Site Plans and technical reports provided with the ARA application. A summary of the comments and recommendations is provided in Section 6 of the MHBC report. The following response is offered for your consideration.

	PEER REVIEW RECOMMENDATION	APPLICANT'S RESPONSE
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.	<p>As part of the formal notification and consultation process for the Aggregate Resources Act licence application, the application was circulated to provincial review agencies (MNR, MECP, MCM). In accordance with the Provincial Standards for ARA applications, OMAFA is only circulated where the proposal does not include a rehabilitation plan returning the lands to the same soil capabilities as pre-extraction.</p> <p>MNR provided detailed comments and through discussions with the Ministry, the Site Plans have been revised to reflect the MNR comments.</p> <p>MCM reviewed the Archaeology Report for the proposed pit, and provided a letter of clearance which is found in Appendix C of the ARA Summary Report.</p> <p>MECP Species at Risk branch provided comments on the proposal which are being addressed by the applicant's ecological consultant (Dance Environmental).</p>

2.	<p>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.</p>	<p>A Planning Justification Report was provided with the municipal Planning Act application for rezoning.</p>
3.	<p>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.</p>	<p>The application was submitted prior to the PPS 2024 which introduced a requirement for an AIA, or equivalent, for sites in prime agricultural areas.</p>
4.	<p>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.</p>	<p>The MNR completed an extensive review of the Woodland Restoration Plan which resulted in numerous changes to the Plan. These are reflected in the revised version of the Site Plans.</p>
5.	<p>Confirm that OMAFA has no outstanding comments or concerns on the Agricultural Rehabilitation component of the Rehabilitation Plan.</p>	<p>OMAFA has not provided any comments on the application or the rehab plans.</p>
6.	<p>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.</p>	<p>A mutual boundary agreement between the applicant and Township of Zorra was signed February 29, 2024.</p>
7.	<p>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</p>	<p>The Township has indicated that they are several years away from considering a site plan amendment to reduce the northern 15.0 m setback to 0 m. The applicant will be responsible for those costs once the amendment is filed.</p>

	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.	MNR has reviewed the revised site plans with the revised high water table elevations and indicated they are satisfied with the plans.
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: “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.”	As indicated, the MNR has completed an extensive review of the Woodland Restoration Plan. The revised Site Plan notes reflect the Ministry’s comments and requirements with respect to the WRP.
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.	Harrington McAvan Ltd is reviewing this request with the applicant.
11.	Consider re-zoning the environmental features on the property, outside of the proposed extraction boundary to the Open Space (OS) Zone.	While the applicant is open to considering this approach, it is not something that has typically been a requirement for aggregate applications in Zorra Township. The zoning of Environmental Protection and Open Space areas is generally part of a broader municipal exercise, completed in conformity with the associated Official Plan designations.



We hope that this will address the comments and recommendations of the application peer review.

In order to move ahead with the next steps on this file, we would be happy to meet with you at your earliest convenience to discuss the status of the ARA file as well as the municipal public meeting for the zoning application. Please feel free to contact me to arrange a day and time to meet.

Kind regards

Melanie Horton, MCIP, RPP

Esher Planning Inc.