

October 7, 2021

County of Brant  
Development Services  
66 Grand River Street North,  
Paris ON, N3L 2M2

ATTN: Kayla DeLeye, BA, MA, MCIP, RPP, Ec.D  
Senior Planner

Dear Kayla:

**RE: OPA1-21 & ZBA5-21 Lafarge Brantford Pit Expansion – Response to County Comments  
9526FU**

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This letter provides a response to the comments provided by the County of Brant on the Lafarge Brantford Pit Extension Zoning By-Law and Official Plan Amendment Applications. The County's comments are outlined below in italics followed by a response.

**Environmental Planning Comments**

1. *Recommend that a site-specific provision be added that would require the lands to be designated as Natural Heritage System once the Aggregate Resources Act licence has been surrendered.*

We don't believe that this is an appropriate policy to add to the Official Plan Amendment. Once the property has been fully-rehabilitated and the ARA Licences surrendered, the property could be designated to an appropriate post-extraction land-use through the municipal Official Plan Review process or through a site-specific Official Plan Amendment.

2. *Recommend that the following site-specific provision be added to the text of the Zoning By-Law Amendment*

See response to #1 above. This is not an appropriate zoning provision. Once the ARA Licence is surrendered, the property could be re-zoned as part of a Comprehensive Zoning By-law review process to an appropriate land-use or through a site-specific zoning by-law amendment.

3. *The existing tree screen should be preserved and enhanced adjacent to Colborne Street West. Species should be selected on their ability to minimize dust, noise, and emissions from truck traffic.*

Site Plan note 1.2.21 on Page 2 of the site plan currently states that “the existing trees along Colborne Street will be retained where possible”. The following text will be added to this note:

*“Along the front of the acoustical berm facing Colborne Street, trees shall be planted at 5m to 10 m on centre spacing, depending on species, in groupings. Plantings are to be randomly spaced and staggered to appear more natural. All vegetation shall be selected for wind and salt tolerance, hardiness and be appropriate with the plantings included on the rehabilitation plan and the existing retained trees. Local, native species shall be selected and may include, but shall not be limited to, the following: White Pine, White Spruce, Balsam Fir, White Cedar, Common Hackberry; Sugar Maple, Silver Maple, Red Maple, Basswood, Red Oak, and White Oak.”*

4. *Recommend that the berm in Phase 3 have undulating topography for aesthetic purposes. In addition, it is recommended that screening in the form of native trees and shrubs be planted on and/or adjacent to the outside of the berm. Species should be selected on their ability to minimize dust, noise, and emissions from truck traffic.*

The top elevation of the berm has been determined by the technical analysis completed as part of the Noise Impact Study to ensure noise impacts to nearby sensitive receptors are kept within regulatory limits. The Noise Report recommended that the top of the berm be maintained at an elevation of 253masl and this recommendation has been carried forward and implemented on the Site Plan. Therefore, undulating the top elevation of the berm is not feasible and could result in noise impacts to neighbours. The berm will be seeded with a grass/legume mixture to prevent erosion, control dust, and have a naturalized appearance. As outlined in response #3, additional tree planting will be added along Colborne Street and will help to screen the berm.

5. *As per Section 8.1 of the Natural Environmental Report, all new planting will include locally native, non-invasive species. It is recommended that this wording be reflected in the Rehabilitation Plan where relevant. For example:*
  - a. *Under Proposed Vegetation, add 'locally native' prior to non-invasive species.*
  - b. *Similarly, under Slope Creation and Rehabilitation Landform, add 'locally native' prior to non-invasive.*
  - c. *The Nodal Planting Detail should indicate that all species are to be locally native non-invasive species.*

The site plan wording edits suggest above have been implemented on the revised Rehabilitation Page of the Site Plan.

#### **Development Services - Grading Comments**

6. *Field Services Staff have no objection or comments on the application at this time. Field Services Staff will provide detailed comments at the time of the engineering submission. Should site alteration be required prior to obtaining a registered development agreement contact field services for the requirements of a site alteration permit.*

We note that Aggregate Resources Act site plans are not subject to the Municipal Site Plan Approval /Development Agreement process.

**Fire Administration Comments**

7. *When the new site is being put into operation, ensure access is created and maintained in the event that an emergency situation may occur.*

The main access to the pit will be through the existing pit located immediately east. A secondary emergency/farm access to the property will be maintained at the location of the existing residential driveway as shown on the Operational Plan (Page 2) of the Site Plan.

We trust that this letter addresses the County's comments. Please do not hesitate to contact us should you wish to discuss any of the County's comments further. A red-line version of the revised Site Plan will be provided to County Staff shortly that includes the changes outlined in this letter.

Yours truly,

**MHBC**

A handwritten signature in blue ink that reads "Caitlin Port". The signature is fluid and cursive, with the first name "Caitlin" and the last name "Port" clearly distinguishable.

Caitlin Port, MES, MCIP RPP

cc. Carol Siemiginowski, Lafarge