

To: Mayor and Members of Township of South-West Oxford Council

From: Laurel Davies Snyder, Development Planner, Community Planning

Application for Zone Change

ZN 4-25-08 – Soniusfield Farms Ltd.

REPORT HIGHLIGHTS

- The applicant proposes to rezone the subject lands from 'General Agricultural Zone (A2)' to 'Special Aggregate Industrial Zone (ME-sp)' facilitate the establishment of licensed aggregate pit below the water table. The proposed area of extraction is approximately 45.3 ha (119.9 ac) in area.
- Site Plans required through the Aggregate Resources Act (ARA) approval process have been submitted to the Ministry of Natural Resources and Forestry (MNR) for their review and approval.
- Planning staff recommend that the application be deferred until such time that a revised Environmental Impact Study (EIS) / Natural Environment Report (NER) has been submitted to the satisfaction of Oxford County.

DISCUSSION

Background

OWNERS: Soniusfield Farms Ltd.
563438 Thomas Rd., Ingersoll, ON N5C 3J7

APPLICANT: J-AAR Materials Limited
3003 Page St., London, ON N5V 4J1

AGENT: MHBC Planning c/o Neal DeRuyter
540 Bingemans Centre Dr., Kitchener, ON N2B 3X9

LOCATION:

The subject lands are described as Part Lots 26 and 27, Broken Front (West Oxford), Township of South-West Oxford. The lands are located on the south side of Hamilton Road, between Oakwood Street and Five Points Line and municipally known as 583398 Hamilton Road.

OFFICIAL PLAN:

Schedule “S-1”	Township of South-West Oxford Land Use Plan	Limestone Resource Area Agricultural Reserve
Appendix “2-1”	Mineral and Petroleum Resources	Sand and Gravel Resource Area Limestone Resource Area

TOWNSHIP OF SOUTH-WEST OXFORD ZONING BY-LAW NO. 25-98:

Existing Zoning:	‘General Agricultural (A2) Zone’
Requested Zoning:	‘Special Aggregate Industrial (ME-sp) Zone’

PROPOSAL:

The application for zone change proposes to rezone the subject lands from ‘General Agricultural (A2) Zone’ to ‘Special Aggregate Industrial (ME-sp) Zone’ to facilitate the establishment of a Class “A” licensed aggregate pit below the water table.

The subject property is 62.8 ha (155.2 ac) in area and is currently used for farming cash crops (corn/soybean rotation). The lands contain an existing single-detached dwelling and farm buildings and structures which will be maintained.

The subject lands contain a Significantly Ecologically Important Woodland, located in the northeast of the subject lands. The subject lands are located within a Well Head Protection Area (WHPA).

The table below provides a summary of the area of the subject lands, area to be licensed, area to be extracted, and area to be rehabilitated.

Description	Area (ha/ac)
Total site area:	62.8 (155.2 ac)
Total area to be licensed:	49.4 ha (122.1 ac)
Total area to be extracted:	45.3 ha (119.9 ac)
Total area to be rehabilitated:	45.3 ha (119.9 ac)

As required for the submission of the Aggregate Resources Act (ARA) Licence Application and to support the proposed amendment to the Township of South-West Oxford Zoning By-law, the following studies were completed and submitted by the Applicant:

- Planning Report & Aggregate Resources Act Summary Statement prepared by MHBC (October 3, 2024)
- Acoustic Assessment prepared by RWDI (October 2024)
- Agricultural Impact Assessment (AIA) prepared by MHBC (June 2025)
- Natural Environment Report prepared by MTE (April 2025)
- State 1-2 Archeological Assessment, prepared by TMHC inc. (April 10, 2024)
- Traffic Impact Study prepared by SBM (October 2024)
- Maximum Predicted Water Table Report prepared by Novaterra (March 20, 2025)
- Water Report prepared by Novaterra (March 20, 2025)
- Site Plan prepared by MHBC (includes Operational Plan and Rehabilitation Plan) (May 2026)

The applicant applied to the Ministry of Natural Resources and Forestry (MNR) under the Aggregate Resources Act (ARA) for a Category 1, Class “A” Pit Below Water licence. As per Ontario Regulation 244/97 (O. Reg. 244/97), in the case of a pit, below the water table means at or less than 1.5 meters above the maximum level of the predicted ground water table. The pit is proposed to operate at 1 meter above the maximum level of the ground water table, and as such is considered as a below the water table pit even though below water extraction is not proposed to occur at this pit.

The proposed area to be licensed is 49.4 ha (122.1 ac) with a proposed extraction area of approximately 45.3 ha (111.9 ac). Extraction activities are proposed to occur to a maximum depth of 1 meter above the established water table and will occur in three (3) phases commencing at the northwest end of the subject lands and moving southerly, easterly, and then back northerly, as illustrated by Plate 5. The proposed phasing is to allow for continuation of the existing agricultural uses on the subject lands for as long as possible, and to minimize potential dust generation from operations. A maximum of two (2) phases will be open at any one time and progressive rehabilitation will closely follow extraction. The existing agricultural operations on the subject land will continue until such time as they are required for extraction.

The proposed tonnage to be extracted from the proposed pit will be a maximum of 500,000 metric tonnes of aggregate per year.

Pit operations will include site preparation and stripping activities, extraction and loading, processing and stockpiling, shipping, and rehabilitation. No permanent processing areas are proposed for the subject lands. Mobile processing equipment will be used to follow the working face; this will only occur on areas identified on the Site Plan (Plate 4). Materials from the site will be shipped to market or transported to the nearby Walmsley Pit for processing to asphalt. The pit is proposed to be operated Mondays through Fridays 7 am to 7 pm, and Saturdays, 7 am to 1 pm with holiday closures. Consistent with seasonal market trends and demands for material, extraction and processing operations will generally occur from March to November, with limited operations December through February; shipping operations will continue throughout the year.

The subject lands are bordered by Hamilton Road and Thomas Road. Hamilton Road is a County Road and Thomas Road is a Township Road. Hamilton Road provides connections to London, Woodstock, and Highway 401. A vehicular access (entrance and exit) is proposed off Hamilton Road at the existing vehicular access to the property.

The Site Plan, attached as Plate 4 to this report, identifies acoustic and visual berms proposed to be constructed around the proposed pit to provide visual and noise mitigation and buffering. Plate 6 illustrates the Rehabilitation Plan; progressive rehabilitation of the extracted area will occur as the aggregate operation proceeds across the property and the final rehabilitated site will be restored to an agricultural condition.

There are seven (7) rural residential uses abutting the northern edge of the property, located on the south side of Hamilton Road and zoned ‘Residential Existing Lot (RE) Zone’, and one (1) rural residential use to the northeast of the property also zoned ‘Residential Existing Lot (RE) Zone’. There are four (4) rural residential uses on the north side of Hamilton Road across from the subject lands, also zoned ‘RE’. There is an agricultural property to the east of the subject lands, zoned ‘General Agricultural (A2) Zone’. Abutting the subject lands to the west, there is a property containing a Provincially Significant Wetland (PSW) owned by Oxford County, and an existing operating aggregate operation. To the south, there are agricultural uses and the Canadian Pacific Railway Line. To the west of the subject lands further along Hamilton Road, there is an agricultural

business (NorTerra Foods Inc.), and several aggregate operations on the north and south sides of Hamilton Road.

Plate 1a, Location Map and Existing Zoning, shows the location of the subject lands and the existing zoning in the immediate vicinity.

Plate 1b, Location Map and Existing Zoning – Close-up View, shows the subject lands and existing zoning.

Plate 2a, Aerial Map (2025), provides an aerial view of the subject lands and surrounding area.

Plate 2b, Aerial Map (2025) – Close-up View, provides an aerial view of the subject lands.

Plate 3, Location Map and Official Plan Designation, shows the subject lands and existing land use designation of the subject lands and the lands in the surrounding area.

Plate 4, Applicant’s Sketch – Site Plan, shows the proposed area to be licenced and proposed extraction area including technical recommendations, as provided by the Applicant.

Plate 5, Applicant’s Sketch – Sequence of Operations Plan, shows the details and phases of extraction including technical comments, as provided by the Applicant.

Plate 6, Applicant’s Sketch – Rehabilitation Plan, shows the proposed rehabilitation plan including technical comments, as provided by the Applicant.

APPLICATION REVIEW

2024 PROVINCIAL PLANNING STATEMENT

The 2024 Provincial Planning Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development. Under Section 3 of the Planning Act, where a municipality is exercising its authority affecting a planning matter, such decisions shall be consistent with all policy statements issued under the Act. The following outlines the key PPS policies that have been considered but is not intended to be an exhaustive list.

Section 4.3.5.1 states that Planning authorities may only permit non-agricultural uses in prime agricultural areas for:

- a) extraction of minerals, petroleum resources and mineral aggregate resources,
- b) limited non-residential uses, provided that all of the following are demonstrated:
 1. the land does not comprise a specialty crop area;
 2. the proposed use complies with the minimum distance separation formulae;
 3. there is an identified need within the planning horizon identified in the official plan as provided for in policy 2.1.3 for additional land to accommodate the proposed use; and,
 4. alternative locations have been evaluated, and i. there are no reasonable alternative locations which avoid prime agricultural areas; and ii. there are no reasonable alternative locations in prime agricultural areas with lower priority agricultural lands.

Additionally, the policies of Section 4.5.3, Rehabilitation, establish:

- 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 encouraged where there is a concentration of mineral aggregate operations.

Section 4.5.3.2 of the PPS states 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.

Section 4.5.4 of the PPS states that 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;
- b) the site will be rehabilitated back to an agricultural condition.

Section 5.1 of the PPS establishes that development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage and not create new or aggravate existing hazards. Further, Section 5.2 establishes that Planning authorities shall, in collaboration with conservation authorities where they exist, identify hazardous lands and sites and manage development in these areas in accordance with provincial guidance.

OFFICIAL PLAN

The subject lands are located within the 'Agricultural Reserve' and the 'Limestone Resource Area' according to Appendix "S-1", Township of South-West Oxford Land Use Plan as contained in the Official Plan and illustrated by Plate 3.

Within the Agricultural Reserve, a range of agricultural uses together with accessory residential uses and farm buildings and structures are permitted. Sand and gravel, oil, gas and gypsum extraction and ancillary uses are also permitted as interim uses within the Agricultural Reserve in accordance with the policies in Section 3.4, Resource Extraction Policies.

Appendix 2-1 of the Official Plan, Mineral and Petroleum Resources, identifies the subject lands as within a Sand and Gravel Resource Area with the southeastern portion within a Limestone Resource Area. An amendment to the Township of South-West Oxford Zoning By-law is required for any new or expanding sand or gravel extraction operations.

Section 3.4.1.3.1.2, Sand and Gravel Resource Extraction, establishes that sand and gravel extraction and all accessory uses, buildings and structure essential to this use in accordance with Section 3.4.1.3.1.1 are permitted within all land use designations outside of settlements in accordance with the relevant policies of the Official Plan. This section also establishes that during the operational life of the sand and gravel extraction operation, aggregate recycling operations and uses ancillary to the extraction of sand and gravel, such as asphalt and concrete batching plants, aggregate transfer stations and similar uses, may be permitted within licensed extraction operations subject to site-specific zoning. Any operations incidental to progressive rehabilitation of the lands are also permitted.

Section 3.4.1.3.2 establishes the following criteria for evaluating an application for a Zoning By-law Amendment to permit a new or expanding mineral aggregate operation:

- Demonstration that the proposal is consistent with the principles, strategic initiatives, objectives and policies of the Official Plan.
- Impacts and cumulative impacts have been assessed and found to be acceptable relative to:
 - the transportation system;
 - natural heritage features and areas, and the broader natural heritage system;
 - quantity and quality of surface water and groundwater and municipal water supplies;
 - agricultural resources and operations;
 - residents and the community regarding noise, dust, particulate matter, air quality, traffic, and other social and economic impacts; and,
 - cultural heritage resources.
- The proposed after-use is compatible with existing and proposed land uses in the surrounding area, will provide net environmental gain and is technically feasible, environmentally sound and in compliance with the permitted uses and policies of the underlying land use designation.
- Confirmation from the Ministry of Natural Resources and Forestry (MNRF) that the Ministry has no objections to the licence application, subject to any required amendments to the Official Plan and/or Zoning By-law being approved.
- Confirmation that all the requirements of the Ministry of Environment and Climate Change (MOECC) with respect to noise, vibration, particulate and any other air emissions requirements have been satisfied.
- Confirmation that all the requirements of the MOECC or the Conservation Authority with respect to relevant environmental concerns relating to surface and groundwater quality and quantity have been met.

In considering an application to amend the Official Plan and/or Zoning By-law to allow any new or expanding mineral aggregate extraction operations, Council requires the submission of the following information:

- All information required to satisfy licence application requirements under the Aggregate Resources Act (ARA), including site plans, existing features plans, operational plans, progressive rehabilitation and final rehabilitation plans, and any reports and/or technical studies;
- A comprehensive land use study that assesses the impacts and cumulative impacts, and shall include:
 - Identification of all relevant policies of the PPS and Official Plan and demonstration of consistency with those policies;
 - An assessment of:
 - cumulative traffic impacts, including a haul route assessment;
 - natural heritage features and areas;
 - water resources;
 - agricultural impact;
 - noise and vibration impacts;
 - dust and air quality impacts;
 - cultural heritage resources;
 - visual impacts; and,
 - social and economic impacts.

Section 3.4.1.6, Natural and Cultural Features, provides additional policies to conserve and protect the quality of the natural environment and cultural heritage resources in the review of new or expanded pits or quarry operations, including:

- Extraction shall not be permitted within significant wetlands and extraction within fish habitat or habitat of endangered and threatened species shall only be permitted in accordance with provincial and federal requirements.
- Extraction within or adjacent to lands in the County's natural heritage system will be subject to the policies of Section 3.2.6, Environmental Impact Studies.
- The policies of Section 3.2.2.4, Archaeological Sites, apply.
- Extraction on lands identified as an Earth Science ANSI will satisfy Section 3.2.5.2.2.
- The policies of Section 3.2.7.2, Water Resources and Section 3.2.8, Environmental Constraints apply.

ZONING BY-LAW

The subject lands are currently zoned 'General Agricultural (A2) Zone' according to the Township of South-West Oxford By-law No. 25-98. The 'A2' zone permits a variety of agricultural uses.

The subject lands are proposed to be rezoned to 'Special Aggregate Industrial (ME-sp) Zone' to permit a mineral aggregate operation (Bardoel Pit).

The 'ME' zone does not include provisions for a minimum lot area, frontage, or depth, but does require a minimum setback of 30 m (98.4 ft) from any property line for buildings, structures or stockpiles and a 90 m (295.3 ft) setback from any residential or development zone.

Section 20.2.2, Property Abutting ME Zone, Excepting a Farm, establishes that notwithstanding any other provisions of this Zoning By-Law to the contrary, where any lot line or portion thereof abuts another ME Zone, no building, structure or product stockpile setback is required along that portion of such lot line for uses other than farm uses. The Applicant has requested a special provision to permit a setback of 0 m for product stockpiles from any property line that abuts an Aggregate Industrial Zone.

AGENCY COMMENTS

The application was circulated to public agencies considered to have an interest in the proposal. All the comments received through the circulation process are summarized below.

Oxford County Public Works commented that if upgrades within the Oxford County's road allowance are required, a Work in the Right-of-Way Permit will be required.

Township of South-West Oxford Public Works commented that an operational access for pit operations on Thomas Road will not be supported or permitted. The gate identified for farm use further to the west along Thomas Road must remain strictly limited to agricultural access and must not be used for any aggregate or operational trucking purposes at any time. There are no concerns with reducing the proposed 30 m (98.4 ft) setback to 15 m (49.2 ft) setback along Thomas Road if the applicant can obtain approval from the MNRF.

Oxford County Source Water Protection commented that a Section 59 review was completed in early 2026 which resulted in the issuing of a Section 59 2(a) Notice to Proceed. The extent of the proposed aggregate extraction area is outside of the Wellhead Protection Area A and B with a vulnerability of 10. This means that the proposed activities do not represent a significant drinking water threat under the Clean Water Act, 2006. The applicant has confirmed that refueling will be

undertaken using mobile refueling vehicles brought to site as necessary, and all fuel handling for the site will occur outside of the Wellhead Protection Areas A and B with a vulnerability score of 10 for Ingersoll Well 3, therefore no Section 57 prohibition; nor Section 58 risk management plan policies apply.

The Oxford County Federation of Agriculture (OCFA) indicated that they do not have any objections to the application and requested that the rehabilitation plan mandate that upon the completion of the gravel extraction activities, the land is restored to its original state and made suitable for agricultural use.

Upper Thames River Conservation Authority (UTRCA) reviewed the application, Natural Environment Report, and Hydrogeological Level 1 and Level 2 Assessment, and proposal and commented that the following work and information is required.

- Conducting work to accurately characterize and map the natural features, natural feature limits, and proposed project boundaries and setbacks.
- Updating all mapping, plans, and documents to include all natural features identified through on-site evaluation and from UTRCA approximate regulated areas mapping.
- Providing hydrological conditions, and information on relationships/linkages for natural heritage features.
- Installing monitoring wells to establish high water levels.
- Increasing the distance for the Complaint Response Procedure due to the potential hydraulic connectivity of the sand/gravel and regional gradients towards receptors.
- Including separate sections for the monitoring plan and mitigation plan.
- Assessing and revising as appropriate:
 - potential impacts of proposed berms on surface water flows to the PSW; and,
 - placing berms outside of the 30 m setback to ensure surface flows to the PSW are maintained within the area of interference, and, where berms are proposed near a watercourse, berms are recommended to be set back 15 m or an appropriate distance with justification.
- Ensuring consistency and accuracy of information in all mapping, documents, and plans.

Thames Valley District School Board (TVDSB), and the Township of South-West Oxford Chief Building Official (CBO/Drainage Superintendent, Species at Risk (SAR), and Southwestern Public Heath indicated that they reviewed the application and do not have any comments, concerns, or questions at this time.

PUBLIC CONSULTATION

Members of the public and community members were provided opportunities to be involved in the ARA licensing process (managed by the Applicant) and the Zoning By-law Amendment process. A Notice of Complete Application and a Notice of Public Meeting regarding the application were provided to surrounding property owners in accordance with the requirements of the Planning Act on July 28, 2025, and April 29, 2026, respectively. As part of the ARA process, the Applicant held a Public Open House on November 6, 2025, at the Salford Community Centre, 6 – 8 PM and developed a Frequently Asked Questions (FAQ) document which is posted on the Township's website.

At the time of writing this report, Planning staff had received written correspondence, emails, and telephone calls from members of the public. All comments were forwarded to the Applicant and Agent for their information and follow up as required. Public comments received via letter and email are attached to this report as Appendix A.

In addition to requests for additional information and questions regarding the need for an aggregate pit, the following items were identified as concerns:

- Hamilton Road: increased volume of truck traffic resulting in increased vehicular speed, dust, noise, vehicular collisions, decrease in pedestrian safety;
- vibration and noise from excavating and processing equipment;
- impacts on wildlife;
- impacts on groundwater and existing wells;
- impact on property values;
- damage to the landscape and that the aggregate operation will be an eyesore;
- impacts on adjacent properties (run off, flooding);
- ongoing road maintenance/damage to roads; and,
- health concerns.

Planning Analysis

The applicant is proposing to rezone the subject property from 'General Agricultural Zone (A2)' to 'Special Aggregate Industrial Zone (ME-sp)' to facilitate the establishment of a Class A, below water table licensed sand and gravel pit.

Supporting Technical Studies

Planning Justification Report and Aggregate Resources Act Summary Statement

The Planning Justification Report and Aggregate Resources Act Summary Statement prepared by MHBC Planning, provides an overview of the proposed operation, including site description, surrounding area, haul routes, traffic, quality and quantity of the aggregate resource, and rehabilitation of the lands.

The report summarizes the application and provides an analysis of the proposed pit in the context of current provincial and municipal planning policies. The Planning Report also identifies how the application addresses provincial interests as defined in the Planning Act, including the protection of ecological systems, the protection of agricultural resources, the conservation and management of natural resources and the mineral resource base, and the financial and economic well-being of the province and its municipalities. The Planning Justification Report addresses the Official Plan policies that are relevant to the proposal.

The report concludes that the proposed pit operation has been designed and reflects recommendations of the accompanying technical reports. The operational notes on the ARA Site Plan have incorporated and included conditions regarding specific recommendations and measures to mitigate negative impacts of the operations, as recommended by the technical reports.

Acoustic Assessment

RWDI prepared an acoustic assessment to provide a technical basis for demonstrating the acceptable level of noise expected to be generated from the proposed aggregate extraction operation. The assessment established the sound level limits on nearby noise-sensitive receptors based on the noise guidelines of the Ontario Ministry of the Environment, Conservation and Parks (MECP), assessed sound levels from the proposed pit on identified sensitive receptors (sensitive land uses including but not limited to dwellings, amenity areas, terraces/patios), and recommend noise control measures to achieve compliance where predicted sound levels were found to exceed applicable MECP sound level limits.

The assessment considered sound power levels and the worst-case pit sound levels which generally occurs at locations close to the receptors given a worst-case hour occurring in the daytime period only. This represents a case where the pit is running at full capacity with all equipment operating simultaneously and at locations where noise impact is highest for each receptor.

The assessment concluded that the proposed pit would comply with MECP noise guidelines subject to the implementation of the required noise mitigation measures including implementing entrance and perimeter berms, only using the access off Hamilton Road. Recommendations of the Acoustic Assessment have been implemented in the Site Plan. Staff note that there are agreements in place with the existing owners of the dwelling on the subject lands and two (2) vacant lots located across from the subject lands that no additional noise mitigation measures are required, and an agreement with the owners of 563440 Thomas Road that they can continue to live at this location without any noise mitigation measure as they wish to avoid anything that would block the view of the site from their property.

Agricultural Impact Assessment (AIA)

The subject property is currently in active agricultural operation and produces cash crops in a corn/soybean rotation. An Agricultural Impact Assessment (AIA) was prepared by MHBC to assess the soil characteristics on the subject lands, evaluate potential impacts on agriculture from the proposed aggregate extraction operation, and identify measures incorporated into the proposed pit design to minimize and/or mitigate impacts from the proposed operation.

Rehabilitation is required as part of the licensing process. The AIA specifies that extraction and rehabilitation will be phased to ensure that agricultural activities continue the lands until needed to be extracted and buffers and berms are proposed as mitigation measures for ongoing impacts from the proposed operations. Generally, as agricultural lands are removed for extraction, other phases will be progressively rehabilitated to an agricultural condition as quickly as possible, and specifically, to an average of Class 2 soil capability. The Rehabilitation Plan was developed in consultation with the property owner, and proposes to rehabilitate 100% of the extraction area, an area totalling 45.3 ha (107.5 ac).

Stage 1-2 Archaeological Assessment, Proposed Aggregate Pit, Bardoel Farm

A Stage 1 and 2 archaeological assessment was conducted for the proposed aggregate pit to evaluate the archaeological potential of the property and determine whether there are archaeological resources present. The assessment concluded that the subject property should be considered free of archaeological concern and no further archaeological assessment is recommended. Should the licensing area change to encompass new lands not subject to survey in the assessment, further archaeological assessment will be required prior to licensing approval.

Environmental Impact Study (EIS) / Natural Environment Report (NER)

The Environmental Impact Study (EIS) / Natural Environment Report (NER) was prepared by MTE Consultants to describe the existing natural environment conditions on and within 120 m (394 ft) of the subject lands, and to determine whether there are any significant natural heritage features present. The NER also discusses the potential for negative impacts on any identified significant natural heritage features and provides recommendations for preventative, mitigative, and remedial measures.

The NER identified that the Five Points Woods Pond located on an adjacent property, northwest of the proposed Bardoel Pit, is a classified Provincially Significant Wetland (PSW). Based on the topography of the surrounding area, all surface water is expected to flow in the northwesterly direction to the PSW pond. A minimum 30 m (98.4 ft) buffer between PSW and the limit of extraction will be applied to protect the feature and its function.

The NER identified a contiguous woodland feature to the east of the subject lands. No removal of the feature is proposed, and this feature will remain outside of the area to be licenced and limit of extraction. A candidate significant wildlife habitat is associated with the adjacent natural vegetation communities. A 15 m (49.2 ft) buffer from the dripline will be applied to protect the ecological function of the woodland.

The report identified and accounted for potential impacts to endangered and threatened species. A 15 m (49.2 ft) buffer will be maintained from the three (3) candidate bat maternity trees along the east side of the subject lands and the one (1) on the west side.

The NER identified that setbacks implemented in the pit design intended to protect the identified significant natural heritage features and identified that these areas are excluded from extraction. Sediment and erosion control measures are recommended to be installed and monitored, and all stockpiled aggregates will be stored in a location that will prevent the movement of sediment-laden runoff into the PSW.

The NER concluded that with the implementation of the report recommendations into the ARA Site Plans, the proposed Bardoel Pit is not anticipated to have any negative impacts on the PSW, candidate significant wildlife habitat, significant woodlands, or candidate bat maternity roosts identified on lands adjacent to the Licence boundary.

Through the Peer Review process and comments received from the UTRCA, it was identified that additional information, and work is required including but not limited to the following.

- Conducting a site visit and any required consultation with UTRCA staff, County staff, the Peer Reviewer, and the Agent and Applicant to confirm and accurately characterize and map all the natural features and natural feature limits and proposed project boundaries and setbacks.
- Updating all mapping, plans, and documents to include all natural features identified through on-site evaluation and from UTRCA approximate regulated areas mapping.
- Providing hydrological conditions and relationships between features including baseline monitoring data.
- Including characterization, impact assessment, mitigation and rehabilitation for linkages within the natural heritage system/features on and adjacent to the subject lands and proposed operation, and an explanation for how the features will remain connected to support their ecological functions throughout the operation of the proposed pit.
- Installing monitoring wells to establish high water levels.
- Increasing the distance for the Complaint Response Procedure due to the potential hydraulic connectivity of the sand/gravel and regional gradients towards receptors.
- Including separate sections in the EIS/NER for the monitoring plan and mitigation plan.
- Assessing and revising as appropriate:
 - potential impacts of proposed berms on surface water flows to the PSW unevaluated wetlands, the seep/spring SWH, amphibian SWH and hydrologic feature/watercourse within the natural features along the eastern boundary (Community 3); and,
 - proposed berm locations and setbacks to each natural feature established through impact assessments on each natural feature and its ecological functions; include

appropriate and justified distances (m) of setbacks between each feature boundary and berm (including area of construction and limit of grading) in report and on site plans.

- Ensuring consistency and accuracy of information in all mapping, documents, and plans.

Further work is required for the EIS/NER to satisfy the concerns of the UTRCA and the peer reviewer.

Hydrogeological Assessment

A Level 1 and 2 Hydrological Assessment was prepared to meet the requirements for a Class “A” licence for a pit which intends to extract aggregate material from within 1.5 m (5 ft) of the established groundwater table. The proposed mining of sand and gravel will not reach the water table and therefore is not expected to cause lowering of the water table beneath the area of aggregate removal or in the adjacent lands of the proposed operation.

Additionally, interference with local domestic wells and water supply wells was assessed and determined to have little to no risk. Regardless, a Water Supply Interference Complaint Response Procedure was developed and incorporated into the Site Plan.

An annual Groundwater Monitoring Program will extend throughout the life of the pit to assess whether continued operations have impacted groundwater at the subject site.

Overall recommendations from the Novaterra Hydrogeological Assessment and Maximum Predicted Water Table Report have been included on the Aggregate Resources Act Site Plan. The report concludes that through the implementation of mitigation measures, no negative impacts to water resources are anticipated from the proposed Bardoel Pit operation.

Traffic Impact Study (TIS)

A Traffic Impact Study was prepared by Stik Baldinelli Moniz (SBM) in October 2024. The study included a site visit to review the context including the existing road network. The study also included an analysis of the intersections at Hamilton Road and Line 25, King Street West and Ingersoll Street, and Hamilton Road and the access to the Subject Lands (on Hamilton Road), review of existing traffic volumes and operations, background traffic information, and any future road network projects.

The TIS forecasted that if the maximum tonnage limit of 500,000 tonnes of extraction is reached, it could generate 32 trips on Hamilton Road in each of the AM and PM peak hours. It is anticipated that at least 80% of the truck traffic will travel to/from the west; the primary haul route will be west along Oxford Road 9, with some trucks splitting off to the north or south on Middlesex Road 30. Trucks heading to/from the east are primarily expected to follow Oxford Road 9 (Hamilton Road and King Street West) with the majority going to/from the south for access to Highway 401 and some to local roads going north. This route travels throughout the existing industrial area in the west end of Ingersoll which currently accommodates significant heavy truck traffic.

The study concludes that the proposed aggregate pit can be accommodated by the existing transportation network with no significant impact to traffic operations and no road improvements required. The study also concludes that the existing and proposed site access is the most appropriate and preferred location along the frontage due to topography and the fact that this location maximizes the distance separation from the entrance and adjacent residential lots. There

is sufficient spacing from other intersections and driveways, and the site access location meets minimum sight distance requirements.

Provincial Planning Statement 2024

Section 4.5.4 of the PPS states that 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 proposed Rehabilitation Plan is consistent with this policy direction and indicates that 100% of the area to be extracted return to an agricultural condition, specifically, to Class 2 soil capability.

As previously noted in this report, further work is required to revise the Environmental Impact Study (EIS) / Natural Environment Report (NER) / Environmental Impact Study (EIS) to the satisfaction of the County, and specifically, to address comments received through the Peer Review process and from the URTCA as summarized in this report. Until this work has been completed, Planning staff are of the opinion that the proposal is not consistent with the policies of the PPS regarding assessing potential impacts to prime agricultural areas and natural heritage features.

Section 5.1 of the PPS establishes that development is to be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage and not create new or aggravate existing hazards. Planning staff are of the opinion that this policy direction has been addressed. The subject lands do not contain areas of natural hazards (slope hazards), and the proposed limits of extraction and Rehabilitation Plan recognize this.

Oxford County Official Plan

The subject lands are designated 'Agricultural Reserve' and identified as within the 'Limestone Resource Area' in the Township of South-West Oxford Land Use Plan. Appendix 2-1, Mineral and Petroleum Resources, identifies the subject lands as within a Sand and Gravel Resource Area with the southeastern portion as within a Limestone Resource Area.

The proposed pit is a permitted use within the Agricultural Reserve according to the Official Plan and extraction of mineral aggregate resources is an anticipated interim land use within this area (and including the subject lands).

Section 3.1.4.3.2 of the Official Plan establishes criteria by which proposals for new pit operations and/or ancillary uses are to be reviewed. The following section provides a review of whether these criteria have been addressed to date.

Mineral extraction is a permitted and anticipated use within lands identified as within the Limestone Resource Area, and within a Sand and Gravel Resource Area. Section 3.4 of the Official Plan, containing the Resource Extraction Policies recognizes that Oxford County contains significant reserves of mineral aggregate resources including bedrock-derived crushed stone and naturally occurring sand and gravel. It also establishes that mineral aggregate resources are a fixed location non-renewable resource and their effective management is essential to the economy of the County and Province.

The Official Plan acknowledges that it is equally important to ensure that mineral aggregate resources extraction is environmentally and socially responsible; essentially, ensuring the

protection of deposits of mineral aggregate resources for future extraction while protecting agricultural and environmental resources and ensuring that extraction is undertaken in a manner that minimizes social, economic and environmental impacts on the broader community. The Official Plan recognizes that the extraction of mineral aggregate resources will continue to be an important industry in the economy of the County and will focus on protecting existing operations and mineral aggregate resources from incompatible land uses while ensuring that extraction is carried out in a manner that minimizes negative community, economic and environmental impacts.

As previously noted in this report, consistent with comments received through the Peer Review of the Environmental Impact Study (EIS) / Natural Environment Report (NER) and comments received from the UTRCA, additional work is required to revise and complete the Environmental Impact Study (EIS) / Natural Environment Report (NER) to the satisfaction of the County and UTRCA, as summarized in this report. Until these items are completed, this proposal is not consistent with the policies of the Official Plan regarding natural heritage resources and environmental impacts.

The phasing of the proposed operation will allow continuation of agricultural uses for as long as possible, and progressive rehabilitation will occur to minimize the amount of land disturbed at any given time and to allow rehabilitation to occur as quickly as possible. Consistent with the policies of the Official Plan, the lands will be returned to an agricultural condition. As per the Rehabilitation Plan (Plate 6), 100% of the extraction area will be rehabilitated. Staff note that the owner of the subject lands worked with the Applicant to develop the Rehabilitation Plan to ensure that their agricultural operations will continue after the pit license has been surrendered.

With respect to water resources, Section 3.2.7.2, Water Resources, establishes that the County is totally dependent upon groundwater for its water supplies. Section 3.2.7.2.3.1, Source Water Protection, identifies that it is crucial that the County's municipal drinking water supplies are protected to secure a long term, potable water supply to meet the needs of existing and future residents and businesses. Oxford County's Source Water Protection Officer commented that a Section 59 review was completed in early 2026 which resulted in the issuing of a Section 59 2(a) Notice to Proceed. The extent of the proposed aggregate extraction area is outside of the Wellhead Protection Area A and B with a vulnerability of 10 which means that the proposed activities do not represent a significant drinking water threat under the Clean Water Act, 2006. For Council's information, the applicant has confirmed that any refueling will be undertaken using mobile refueling vehicles brought to site as necessary, and all fuel handling for the site will occur outside of the Wellhead Protection Areas. Planning staff note that the Applicant has incorporated a Water Supply Interference Complaint Response Procedure into the Site Plan, and an annual Groundwater Monitoring Program will extend throughout the life of the pit to assess whether continued operations have impacted groundwater at the subject site.

With respect to impacts of vehicular traffic, Planning staff and County Public Works staff are satisfied that the proposed development is reasonable from a traffic and transportation standpoint, as concluded by the Traffic Impact Study.

With respect to community concerns regarding dust, noise and compatibility, it is the opinion of Planning staff that these issues have been satisfactorily addressed by the Applicant through appropriate operational notes on the ARA Site Plan and Sequence of Operations Plan (Plates 4 and 5). Planning staff note that requirements for matters pertaining to acceptable levels of noise, dust, and public health are managed by those involved in approving aggregate site plans on behalf of the MNRF. With respect to potential visual impacts, the pit will be screened by berms and perimeter plantings as determined through the Site Plan process. Dust control measures are

included in the notes on the Sequence of Operations Plan (Plate 5) and include vegetated berms; sequential rehabilitation to minimize disturbed areas; mechanical dust controls on processing equipment, and water spraying. The Acoustical Study concluded that the requirements of the MECP Noise Guidelines can be met if measures to mitigate noise impacts are implemented, including construction of perimeter berms, construction of an acoustical barrier beside any screening equipment, and a minimum separation distance for screening equipment from residential uses. Information regarding these measures is provided on the Sequence of Operations Plan (Plate 5).

Township of South-West Oxford Zoning By-law

The lands are proposed to be rezoned from 'General Agricultural (A2) Zone' to 'Special Aggregate Industrial (ME-sp) Zone'. Once extraction is complete and the site has been rehabilitated in accordance with the approved ARA Site Plans and the License has been surrendered, Planning staff are of the opinion that the entire property be rezoned to 'Special General Agricultural (A2-sp) Zone'.

The Applicant has requested a special provision to permit a setback of 0 m for product stockpiles from any property line that abuts an Aggregate Industrial Zone. This request relates to the abutting property to the west of the subject property, noted on the Site Plan (Plate 4) which is an existing pit (Licence #16190). The Applicant has indicated that the MNR has not noted any concerns with this request. Planning staff are of the opinion that this special provision is not required as Section 20.2.2 permits a 0 m setback for building, structure or product stockpile along that portion of such lot line for uses other than farm uses. Staff notes that the Applicant will be submitting revised Site Plans and have requested that locations for potential product stockpiles be identified.

Summary

Planning staff are of the opinion that as further work is required to complete the EIS/NER to the satisfaction of the County and UTRCA which may result in amendments to the Site Plan and other documents, the proposal is not consistent with the principles, strategic initiatives, objectives and policies of the PPS and County Official Plan

Staff recommend that this application is deferred until such time that a revised Environmental Impact Study (EIS) / Natural Environment Report (NER) and updated Site Plans have been submitted, and confirmation has been received from MNR that the site plans have been approved.

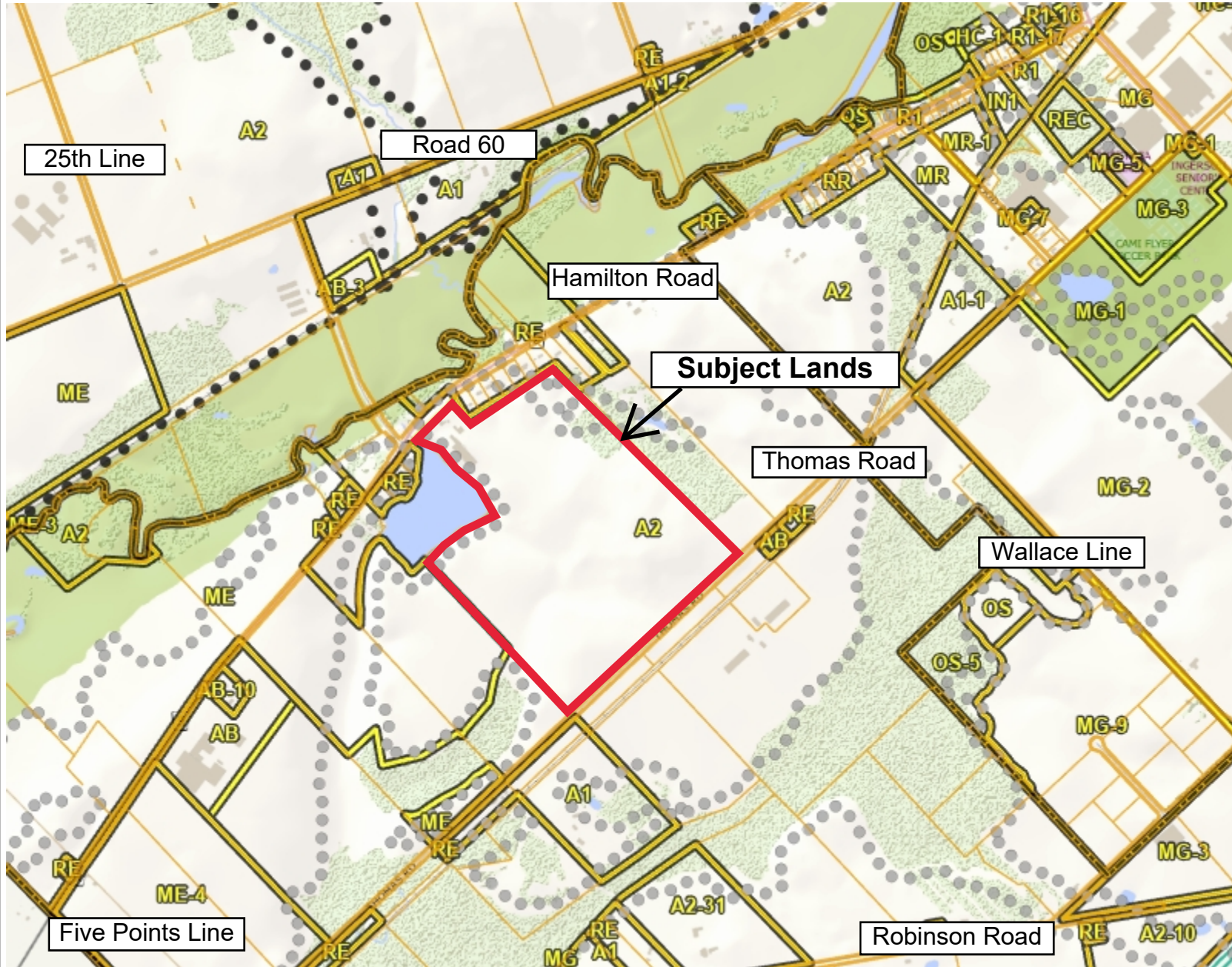
RECOMMENDATIONS

It is recommended that the Council of the Township of South-West Oxford defer the zone change application submitted by J-AAR Materials Limited whereby lands described as Part Lots 26 and 27, Broken Front West Oxford, Township of South-West Oxford are rezoned from 'General Agricultural Zone (A2)' to 'Special Aggregate Industrial Holding Zone (ME-sp(H))' to permit a new Class 'A' (pit below water table) aggregate operation, pending submission of a revised Environmental Impact Study (EIS) / Natural Environment Report (NER) as described in Report CP-2026-158.

SIGNATURES

Authored by: Original Signed By Laurel Davies Snyder, MCIP, RPP
Development Planner

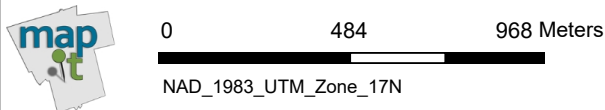
Approved for submission: Original Signed By Eric Gilbert, MCIP, RPP
Manager of Development Planning



Legend

- Parcel Lines**
 - Property Boundary
 - Assessment Boundary
 - Unit
 - Road
 - Municipal Boundary
- Zoning Floodlines**
- Regulation Limit**
 - ◆ 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

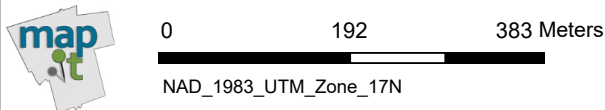
July 25, 2025



Legend

- Parcel Lines**
 - Municipal Boundary
 - Property Boundary
 - Assessment Boundary
 - Road
 - Unit
- Zoning Floodlines Regulation Limit**
 - ◆ 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

May 8, 2026



Legend

- Parcel Lines**
 - Municipal Boundary
 - Property Boundary
 - Assessment Boundary
 - Road
 - Unit
- Zoning Floodlines Regulation Limit**
 - ◆ 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



0 766 1,532 Meters

NAD_1983_UTM_Zone_17N



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

May 8, 2026



Legend

- Parcel Lines**
- Municipal Boundary
 - Property Boundary
 - - - Assessment Boundary
 - Road
 - Unit
- Zoning Floodlines Regulation Limit**
- 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)

Notes



0 192 383 Meters

NAD_1983_UTM_Zone_17N



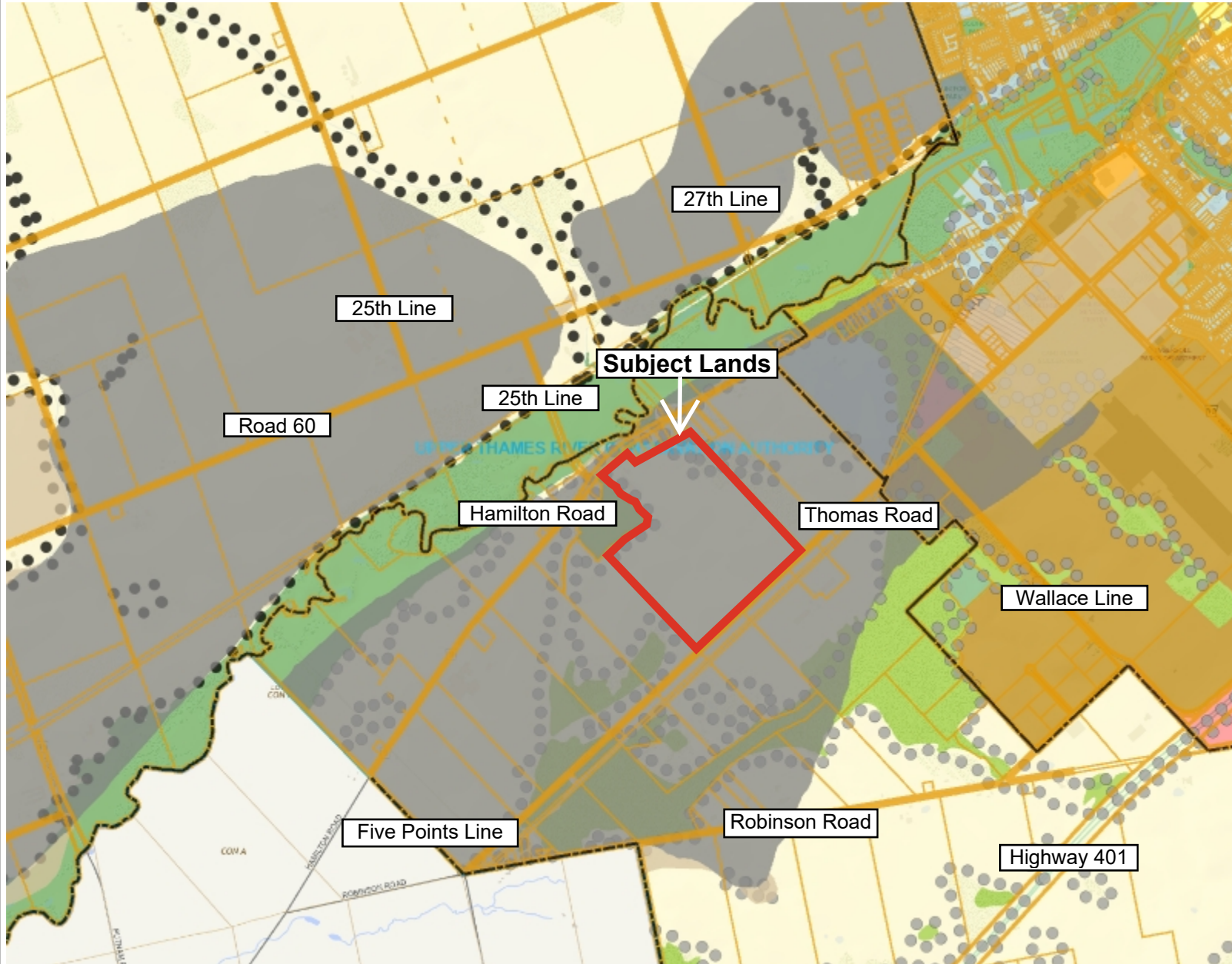
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

May 8, 2026

Plate 3: Location Map and Official Plan Designation

File No.: ZN 4-25-08 (Sonusfield Farms Ltd.)

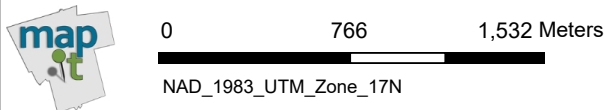
Part Lots 26-27, Broken Front Concession, 583398 Hamilton Road, Township of South-West Oxford



Legend

- Parcel Lines**
 - Municipal Boundary
 - Property Boundary
 - Assessment Boundary
 - Road
 - Unit
- Limestone Resource**
- Sand and Gravel Resource (Primary)**
- Conservation Authority Watersheds**
- Zoning Floodlines Regulation Limit**
 - ◆ 100 Year Flood Line
 - ▲ 30 Metre Setback
 - Conservation Authority Regulation Limit
 - Regulatory Flood And Fill Lines
- Land Use Zoning (Displays 1:16000 to 1:500)**
- 100 Metre Buffer Ingersoll**
- Site Specific Policy Areas**
- Village Land Use Designation**
 - Village Core
 - Service Commercial
 - Low Density Residential
 - Medium Density Residential
 - Industrial
 - Minor Institutional
 - Major Institutional
 - Future Urban Growth
 - Open Space
 - Environmental Protection
 - School
- Requiring Secondary Planning (See Sec. 4.2.2.4)**

Notes



This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. This is not a plan of survey

May 11, 2026

Key Plan

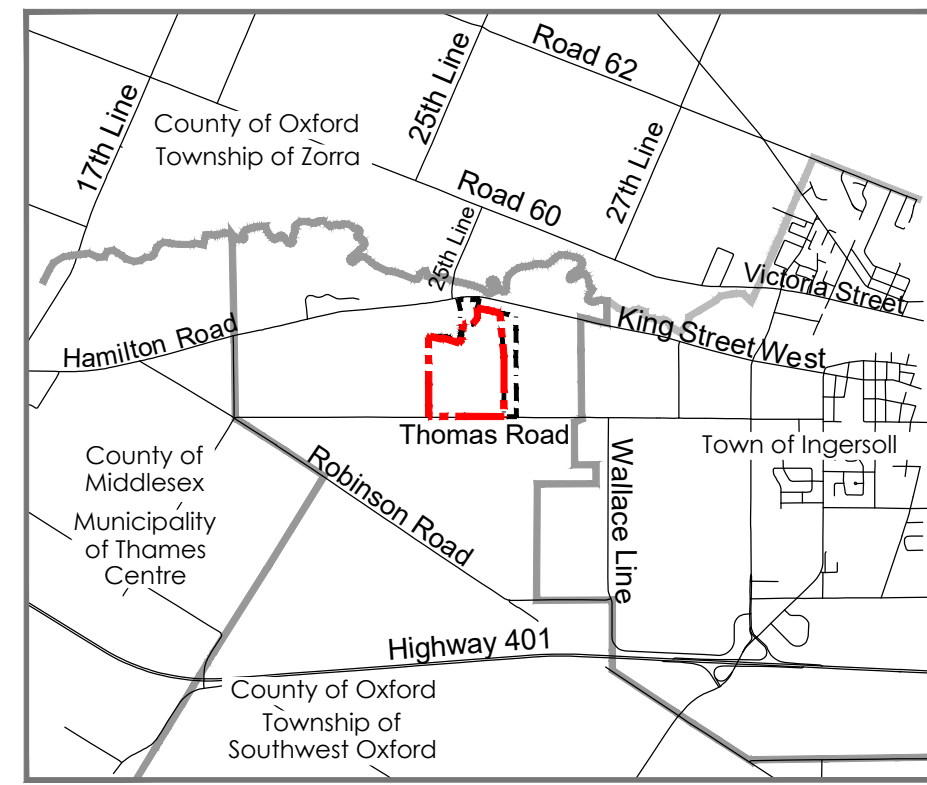
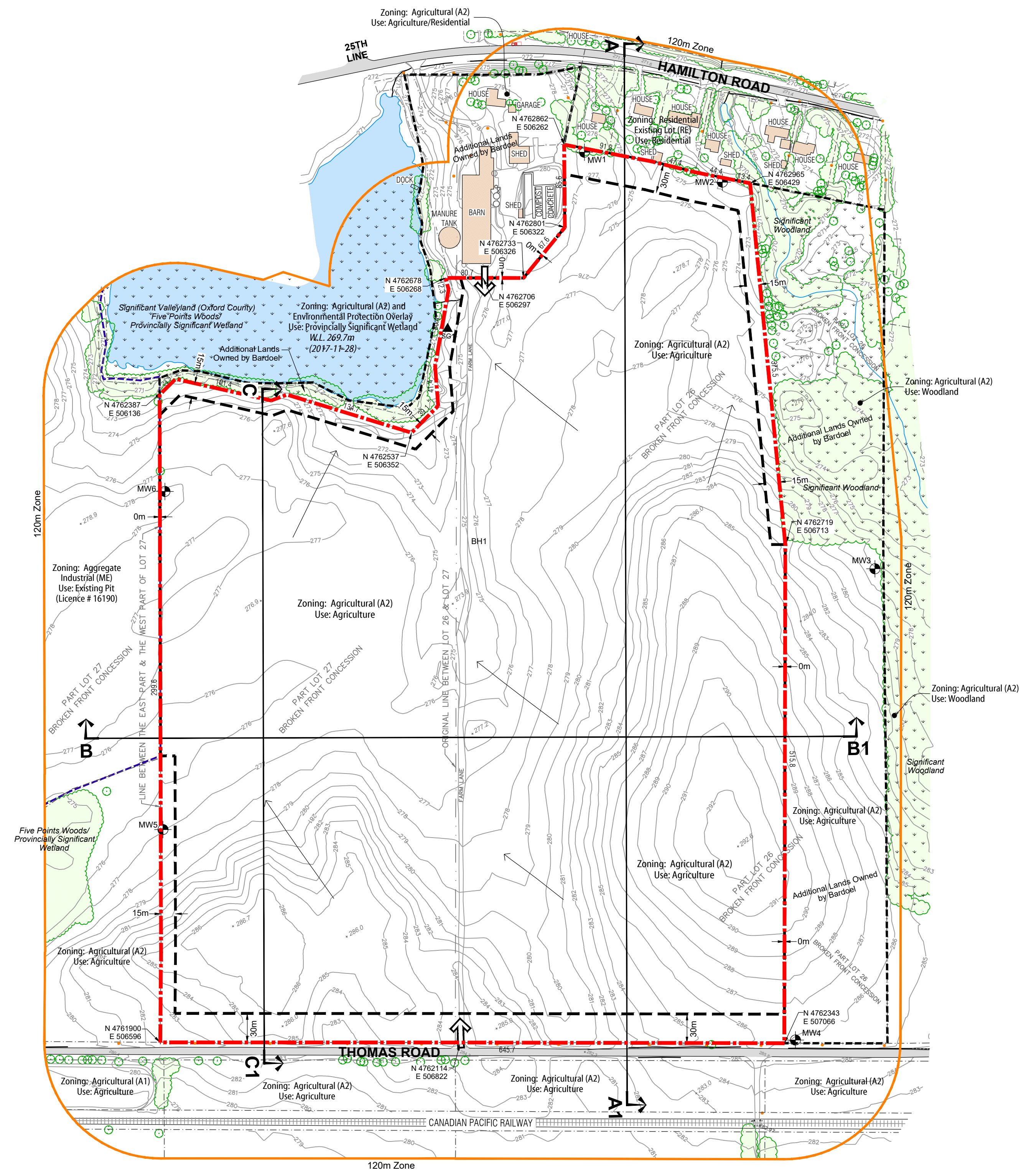


Plate 4: Applicant's Sketch - Site Plan
File No: ZN 4-25-08 (Soniusfield Farms Ltd.)
Part Lots 26-27, Broken Front Concession, 583398 Hamilton Road, Township of South-West Oxford

Notes:

- A. General**
- This site plan is prepared under the Aggregate Resources Act (ARA) for a Class 'A' Licence for a pit below the ground water table (to 1m of the water table) and follows the Aggregate Resource of Ontario: Site Plan Standards August 2020 (Notes 1-32).
 - Area calculations:
 - Licence Boundary: 49.4 ha (122.1 acres)
 - Limit of Extraction: 45.3 ha (111.9 acres)
 - All measurements shown are in metres unless specified otherwise.
- B. References**
- Topographic features & parcel information from photogrammetric mapping by first base solutions (JD Barnes), Brampton, Ontario, Utilizing 2015 Air Photography. All Dimensions are in metres. Elevations are geodetic, Above Sea Level (ASL). Contains information licensed under the Open Government Licence - Ontario. Mapping is produced in real world scale and coordinates (NAD83 UTM Zone 17N). Contour interval is 1m. All elevations are geodetic.
 - Property boundary from parcel fabric on vuMap (First Base Solutions).
 - Land use information and structures identified on or within 120 metres of the licence boundary (see schematic on this drawing) was compiled from 2018 Google Satellite imagery.
 - Existing land use designations on and within 120 metres of the licence boundary (see schematic on this drawing) was obtained from the County of Oxford Official Plan, Schedule S-1 - Township of South-West Oxford Land Use Plan, 1995 (updated March 31, 2023).
 - The subject site is zoned Agricultural (A2) Zone in The Township of South-West Oxford Zoning By-law No. 25-98 (Consolidation September 30, 2022).
- C. Drainage**
- Surface drainage on and within 120 metres of the licence boundary is by overland flow in the directions shown by arrows on the plan view or by infiltration.
- D. Maximum Predicted Water Table**
- The maximum predicted water table on site ranges between 268.4 masl in the northern portion of the site to 285.6 masl in the eastern portion of the site and is shown on drawing 4 of 4. Elevations provided by Novaterra Environmental Ltd. (March 20, 2025).
- E. Site Access and Fencing**
- There are two existing accesses to the site. One from Hamilton Road and the other on Thomas Road. The site will be accessed through the existing site entrance/exit from Hamilton Road shown on the plan view.
 - Post and wire fencing (unless noted otherwise) exists in the locations shown on the plan view.
- F. Aggregate Related Site Features**
- There are no existing aggregate operations or features on-site such as processing areas with stationary or portable equipment, stockpiles, recyclable materials, scrap, haul roads, fuel storage, berms or excavation faces.
- G. Significant Natural Features Within 120 Metres**
- On Site: None
 - Within 120m: Provincially Significant Wetlands, significant woodlands, and candidate significant wildlife habitat.
- H. Significant Human-Made Features and Structures Within 120 Metres**
- There are no known built heritage resources on site or within 120m of the site.
 - There are currently no existing permanent buildings or structures located on the site. Within 120 metres of the site there are 12 houses located on Hamilton Road to the north of the site; one house located to the east of the site with access from Thomas Road; and a barn, manure tank, two sheds, house, and garage on additional lands owned by Bardoeil's to the north with access to Hamilton Road.
- I. Location of Existing Tree Cover**
- The existing off-site tree cover is shown on this plan. Portions of the off-site lands to the northwest, east, west, and south are tree covered.
- J. Cross Sections**
- As shown on page 4 of 4
 - Cross section locations are identified on the plan view for each drawing.
- K. Technical Reports - References**
- Natural Environment: "Bardoeil Pit, Natural Environment Report (NER)" March 31, 2025 (Source: MTE Consultants Inc.)
 - Hydrogeology: "Hydrogeological Level 1 and Level 2 Assessment, Proposed Bardoeil Pit" March 20, 2025 (Source: Novaterra Environmental Ltd.)
 - Maximum Predicted Water Table Report: "Maximum Predicted Water Table Report, Proposed Bardoeil Pit" March 2025 (Source: Novaterra Environmental Ltd.)
 - Noise: "J-AAR Bardoeil Farm Pit Acoustic Assessment" March 28, 2025 (Source: RWDI)
 - Archaeology: "Stage 1-2 Archaeological Assessment Proposed Aggregate Pit Bardoeil Farm" April 10, 2024 (Source: TMHC Inc.)
 - Traffic: "Traffic Impact Study Proposed Bardoeil Gravel Pit" October 2024 (Source: Strik, Baldinelli, Moniz Ltd.)
 - Agriculture: "Agricultural Impact Assessment" June 2025 (Source: MHBC Planning)



Legal Description

Pt Lt 26-27 Con Broken Front West Oxford,
 Township of Southwest Oxford
 Oxford County

Legend

	Boundary of Area to be Licensed		Limit of Extraction ALL SETBACKS ARE DRAWN TO SCALE AND SHOW LABELLED DISTANCES
	Additional Lands Owned by Bardoeil (Lessor)		Contour and Elevation METRES ABOVE SEA LEVEL
	Existing Licensed Boundary LICENCE #16190		Existing Spot Height Elevation METRES ABOVE SEA LEVEL
	Existing Fence 1.2m POST & WIRE FARM FENCE UNLESS OTHERWISE NOTED		Building/Structure LOCATION AND USE FOR BUILDINGS ON-SITE AND WITHIN 120m ARE SHOWN ON THIS PAGE
	Public Road		Existing Vegetation
	Private Driveway/Laneway		Existing Water Feature AS LABELLED
	Parcel Fabric		Direction of Surface Drainage
	Farm/Field Access		Candidate Significant Wildlife Area
	Monitoring Well/ Staff Gauge NOVATERRA ENVIRONMENTAL (2017)		
	Hydro Pole		
	Existing Railway		
	Cross Sections SEE PAGE 4 OF 4 FOR EXISTING AND REHABILITATED CROSS SECTIONS		

Site Plan Amendments

No.	Date	Description	By

MNR Approval Stamp

Stamp

PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE
MHBC
 200-940 BURGESS CENTRE DR, KITCHENER, ON, N2B 3X9 | P: 519.576.3650 | WWW.MHBCPLAN.COM

Applicant's Signature

Kevin Aarts
 J-AAR Materials Limited

J-AAR Materials Limited
 3003 Page Street
 London, Ontario
 N5V 4J1
 Tel: (519) 652-2104



Bardoeil Pit

ARA Licence Reference No. _____ Pre-approval review: _____

For Submittal to MNR - June 2025

Plan Scale 1:3,000 (Arch D) Plot Scale 1:3 [1mm = 3 units] MODEL

SCALE

Drawn By G.C./DGS File No. 18218A

Checked By N.D.

File Name **EXISTING FEATURES**

Drawing No. **1 OF 4**

Plate 5: Applicant's Sketch - Sequence of Operations Plan
File No: ZN 4-25-08 (Soniusfield Farms Ltd.)
Part Lots 26-27, Broken Front Concession, 583398 Hamilton Road, Township of South-West Oxford

- This site plan is prepared under the Aggregate Resources Act (ARA) for a Class 'A' Licence for a pit below the ground water table (to 1m of the water table) and follows the Aggregate Resource of Ontario: Site Plan Standards August 2020, specifically Operations for all sites (Number 33-56 in the standards).
- Area calculations
 - Licence Boundary 49.4 ha (122.1 acres)
 - Limit of Extraction 45.3 ha (111.9 acres)
- The maximum number of tonnes of aggregate to be removed from this property is 500,000 tonnes in any calendar year.
- No buildings or structures (including a scale and scale house) are proposed.
- The maximum predicted water table within the limit of extraction varies between 268.35 masl in the northern portion of the site and 285.56 masl in the eastern portion of the site (Source: Novaterra Environmental, June 14, 2024). The maximum predicted water table is shown in each cross section on drawing 4 of 4.
- The site lies within the Thames-Sydenham and Region Source Protection Area. Part of the subject site occupies an area designated as WHPA (Well Head Protection Area) associated with Ingersoll Municipal Well 3. No hydraulic relationship between Ingersoll Municipal Well 3 and the water table aquifer at the site was found (Source: Novaterra Environmental - March 20, 2025). See 'Hydrogeology' notes under Section M on this page for mitigation measures.
- Agricultural production will continue in areas not under extraction.
- Setbacks will be as shown and labelled on the Sequence of Operations Diagram and on the Existing Features Plan (page 1 of 4).
- See this page for site plan overrides.

B. Hours of Operation

- Hours of operation shall be Monday to Friday between 7:00 am and 7:00 pm and on Saturdays between 7:00 am to 1:00 pm. No operations are permitted on Sunday or statutory holidays.

C. Site Access and Fencing

- The existing farm/field access on Thomas Road will remain for monitoring, maintenance and agricultural purposes. This access shall be gated, kept closed during hours of non-operation and maintained throughout the life of the licence. Aggregate trucks shall not be permitted to access the site in this location.
- An operational entrance/exit is proposed at the existing access on Hamilton Road (as shown on the plan view). This access shall be gated, kept closed during hours of non-operation and maintained throughout the life of the licence. **A potential operational entrance/exit is identified in the eastern corner of the site at Thomas Road. This access point requires Township approval prior to being used by aggregate trucks.**
- Portions of the licence boundary that are not currently fenced shall be fenced with post and wire fencing at least 1.2 metres in height and maintained for the life of the licence.
- Fencing shall not be required where the licence abuts existing licence #16190 and in these locations, the boundary will be demarcated by 1.2m high marker posts that are visible from one to the other. If conditions in or around the licensed property change or if either licensed site is surrendered or sold, a 1.2m high fence will be installed. All fencing shall be maintained for the life of the extraction. Fencing shall also not be required next to the Five Points Woods Wetlands as an existing fence exists offset the licence boundary. Fencing will not be required next to the Bardoel residence and agricultural structures as there is existing fencing along the property boundaries at Hamilton Road, next to adjacent houses and the Five Points Woods Wetland (see Section N Variations from Control and Operation Standards). In all other locations along the boundary of the site, a fence of at least 1.2 m in height shall be erected and maintained.
- A sign of at least 0.5 metres by 0.5 metres in size shall be erected and maintained at the main entrance that says in legible words "This site is licensed under the Aggregate Resources Act Licence # _____".

D. Drainage

- During excavation surface drainage from active pit areas will be contained within the pit area. Drainage of undisturbed areas will continue and be in the directions shown on the Existing Features drawing on page 1 of 5.

E. Site Preparation

- Prior to site preparation, a Spills Contingency Plan shall be developed to address any potential spills from equipment on-site.
- Timber resources (if any) will be salvaged for use as saw logs, fence posts and fuel wood where appropriate. Non-merchantable timber, stumps and brush may be used or mulched for use in progressive rehabilitation. Excess material not required for use mentioned above will be burned (with applicable permits).
- During construction and earth-moving operations, sediment control measures will be put in place to prevent runoff of suspended solids from leaving the site (see Section M Technical Recommendations 1. Natural Environment).
- Substantial storage of topsoil and minimize the storage of soil shall be minimized. Stripped soils, not required for berm construction, shall be moved directly to depleted areas where they will be immediately used for agricultural rehabilitation. Stripping areas shall be limited to what is required for the season of operation.
- Topsoil/overburden stockpiles will be graded smooth and seeded to prevent erosion (if they are to remain for more than one year). Seeding shall not be required if these stockpiles have vegetated naturally in the first year.

F. Berms and Screening

- Berms shall be constructed as specified in the locations shown on the Sequence of Operations and in accordance with the Technical Recommendations (4. Acoustic Assessment). Locations and heights for all berms are provided on the Sequence of Operations diagram, this page. The heights/elevations shown are the minimum required. Overburden may be stored in separate berms throughout the extraction area.
- Berms shall not be located within three metres of the licence boundary, except for where provided in Section N. variations from Control and Operation Standards.
- All proposed berms will be constructed in accordance with the "Typical Berm Detail" on this page and will be vegetated and maintained to control erosion using a low maintenance grass/legume seed mixture (e.g. MTO Seed Mix) composed of Creeping red Fescue, Perennial Ryegrass, Kentucky Bluegrass and White Clover. Temporary erosion control will be implemented as required.
- Existing vegetation within the setbacks shall be maintained except where berms are required. There are no proposed tree screens at this site.

G. Site Drainage

- No existing or proposed surface water diversions or discharge has and/or will occur on the proposed extraction area. There will be no dewatering or pumping of water in the extraction area.

H. Extraction Sequence

- The operational plan depicts a schematic operations sequence for this property. Phases do not represent any specific or equal time period and blending requirements may require material from adjacent phases. Extraction shall be permitted in two phases simultaneously to facilitate the availability of different aggregate materials located within the Phases and to allow transition between phases.
- The direction of extraction will be in accordance with the Sequence of Operations diagram shown on this page.
- Progressive and final rehabilitation will be completed in direct correlation to the development of the pit as the extraction limits in each Phase are reached and enough area is available to ensure that rehabilitation activities will not interfere with the production and stockpiling of aggregate materials.

I. Extraction Details

- The maximum depth of extraction is as shown as spot elevations on the Sequence of Operations drawing (this page). Extraction will occur in a maximum of 1 lift through the three phases as shown on the Sequence of Operations Diagram on this page and in accordance with the Ministry of Labour requirements. The maximum lift height will be 10 m.
- Extraction will occur to within 1m of the maximum predicted water table. The pit floor will be located at an elevation of 271 to 287 masl. See Rehabilitation Plan (page 3) and Cross Sections (page 4) for excavation depths and final rehabilitation contours.
- Aggregate stockpiles will be located on the pit floor and will follow the working pit face throughout the life of the operations of the pit. Stockpiles will not be located within 30m of the Licensed boundary, except for the western boundary as per agreement with adjacent operator (see Variations from Control and Operational Standards table on this page).
- Internal haul road locations will vary as extraction progresses and will transport materials to the northern operational entrance/exit. Dust will be mitigated on site. Water or another provincially approved dust suppressant will be applied to internal haul roads as often as required to mitigate dust.

J. Equipment and Processing

- Equipment used on-site may include portable crushers, a portable screening plant, loaders, stacker and trucks.
- No permanent processing areas are proposed on site. Portable processing equipment (crusher and screener) may be used on site and will be restricted to the 'Processing Plant Region'. The portable equipment shall be located below grade on the pit floor in close proximity to the extraction face in order to maximize acoustical shielding and within the 'Processing Plant Region'. See Note M 'Noise' and Sequence of Operations diagram for location of 'Processing Plant Region'.
- Within the 'Processing Plant Region', the processing equipment shall remain a minimum of 30 metres from the licence boundary (except where the licence boundary abuts existing licence #16190 - see Section N Variations from Control and Operation Standards) and 90 metres from a property with a residential use. All processing equipment is subject to noise controls and applicable permitting under MCEP Environmental Compliance Approvals.
- Dust will be mitigated on site. Water or another provincially approved dust suppressant will be applied to processing areas as often as necessary to mitigate dust. Processing equipment will be equipped with dust suppression or collection devices where the equipment creates dust and is being operated within 300 metres of a sensitive receptor.

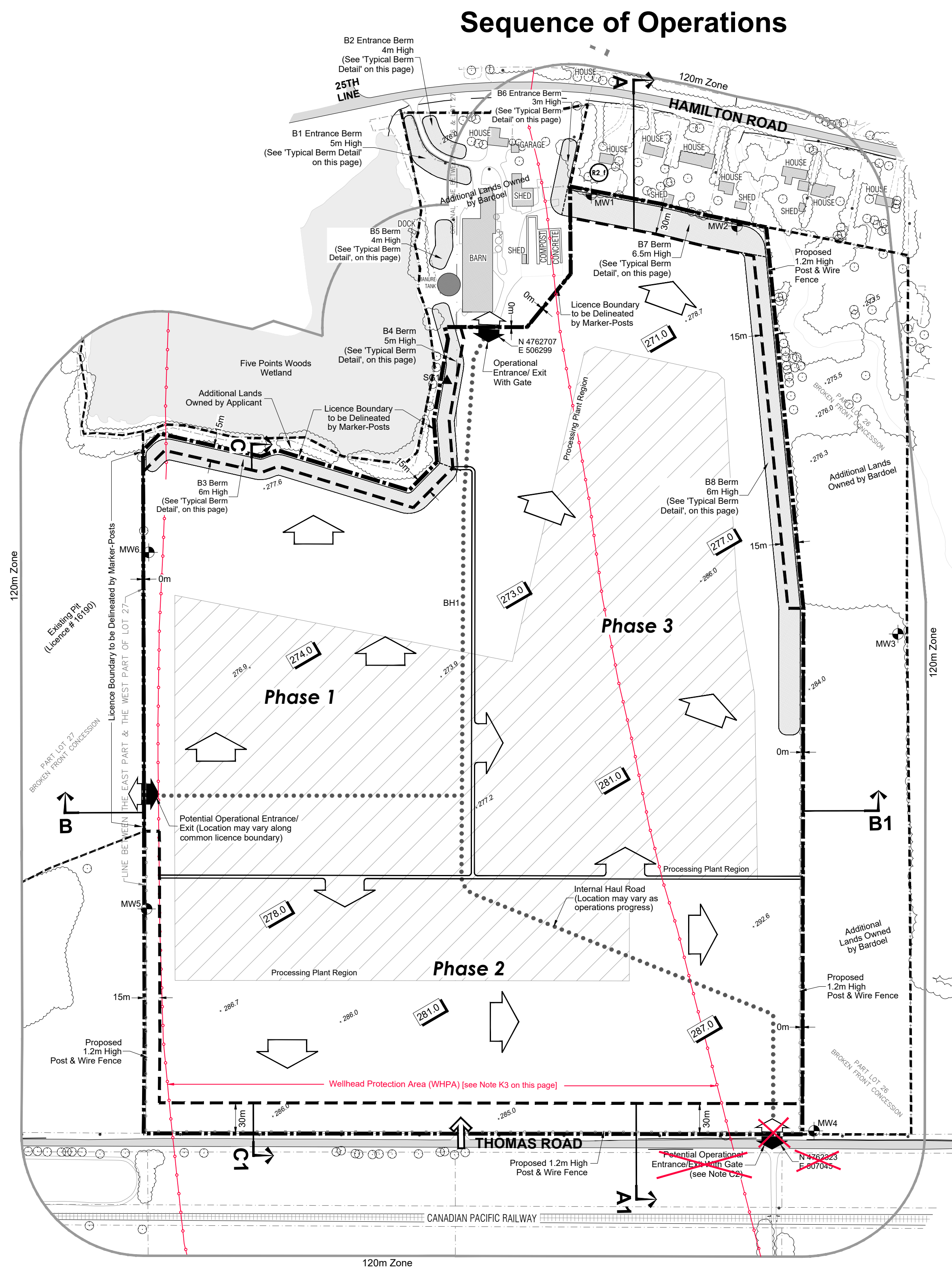
K. Fuel Storage

- No fuel or associated products will be stored on site. Mobile fuelling will occur in accordance with the Gasoline Handling Act, as amended, the Gasoline Handling Code and regulations, as amended, and Liquid Fuels Handling Code.
- Mobile fuelling shall not occur within 30 m of any waterbody.
- Mobile fuelling shall occur only within the portions of Phase 2 and 3 that are outside of the Wellhead Protection Area (WHPA).
- A Spills Contingency Plan shall be prepared and implemented prior to site preparation. The Spills Contingency Plan shall be available on-site and all employees and contractors shall be informed and required to comply with this plan.

L. Scrap and Recycling

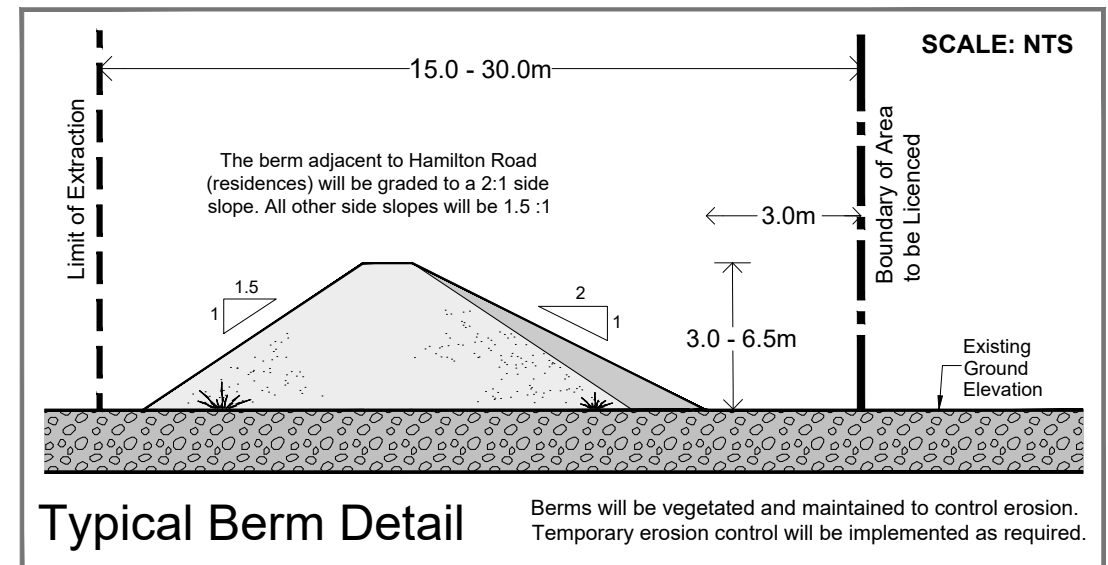
- No recycling is proposed.
- Scrap may be stored on-site within the 'Processing Plant Region' and shall be removed on an on-going basis.
- Scrap shall only include material generated directly as a result of the aggregate operation such as refuse, debris, scrap metal, lumber, discarded machinery and equipment.
- Scrap shall not be stored within 30 metres of any body of water, or the licence boundary.
- The site shall be kept in an orderly condition.

M. Technical Recommendations (Page 3 of 4)



N. Variations from Control and Operation Standards

No.	O.Reg 244/97 Section 0.13	Variation	Rationale
1.	(1)1	A gate will not be required along the potential entrance adjacent to Licence #16190.	Gate not required next to existing pit licence (0 m setback).
2.	(1)10.1	Setback reduced to 0m from 15m along portions of the western, northern and eastern limits of site.	Per executed common boundary agreement, material can be extracted along the common boundary with Licence #16190. The northern and eastern limits of the site are adjacent to the additional lands owned by the Bardoel's (lessor).
3.	(1)13.1	Stockpiling/processing may take place within 30m along the boundary of Licence #16190.	Per executed common boundary agreement, material can be processed/stockpiled along the common boundary with Licence #16190.
4.	(1)16	Berms may be located within 3m boundary of the site where indicated on the Sequence of Operations.	Berms may be located within this area and on the lands owned by the Bardoel's (lessor).
5.	(3)A	Fencing shall not be required where the licence abuts existing Licence #16190. Fencing shall not be required next to the Five Points Woods Wetlands. Fencing shall not be required next to the Bardoel residence and agricultural structures for the lands owned by the Bardoel's (lessor).	Fencing not required along existing licensed pit and per executed common boundary agreement. Fencing exists along the property boundaries at Hamilton Road, next to adjacent houses and the Five Points Woods Wetland.



Legal Description

Pt Lt 26-27 Con Broken Front West Oxford,
 Township of Southwest Oxford
 Oxford County

Legend

	Boundary of Area to be Licensed		Limit of Extraction ALL SETBACKS ARE DRAWN TO SCALE AND SHOW LABELLED DISTANCES
	Additional Lands Owned by Bardoel (Lessor)		Operational Entrance
	Existing Licensed Boundary LICENCE #16190		Proposed Haul Route
	Existing Fence 1.2m POST & WIRE FARM FENCE UNLESS OTHERWISE NOTED		Direction of Excavation REFER TO NOTES (THIS PAGE) FOR ADDITIONAL DETAILS
	Existing Vegetation		Processing Plant Region (NO CRUSHING/SCREENING OUTSIDE THIS REGION)
	Public Road		Proposed Fence 1.2m POST & WIRE FARM FENCE UNLESS OTHERWISE NOTED
	Building/Structure LOCATION AND USE FOR BUILDINGS ON-SITE AND WITHIN 120m ARE SHOWN ON THIS PAGE		Acoustic Berm SEE "TYPICAL BERM DETAIL" AND NOTES ON PAGE 2 OF 4
	Farm/Field Access		Optional Storage Berm SEE "TYPICAL BERM DETAIL" AND NOTES ON PAGE 2 OF 4
	Monitoring Well/ Staff Gauge NOVATERRA ENVIRONMENTAL (2017)		Proposed Spot Elevation MAXIMUM DEPTH OF BELOW WATER EXTRACTION
	Existing Spot Height Elevation METRES ABOVE SEA LEVEL		Receptor Locations WITHIN 120m OF THE SITE
	Cross Sections SEE PAGE 4 OF 4 FOR EXISTING AND REHABILITATED CROSS SECTIONS		Wellhead Protection Area WHPA

Site Plan Amendments

No.	Date	Description	By

MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE
 200-510 BIRKBEYNS CENTRE DR. KITCHENER, ONL N2B 3X9 | P: 519.576.3650 | WWW.MHBCPLAN.COM

MNR Approval Stamp

J-AAR Materials Limited
 3003 Page Street
 London, Ontario
 N5V 4J1
 Tel. (519) 652-2104

Applicant's Signature

 Kevin Aarts
 J-AAR Materials Limited

Project
Bardoel Pit

ARA Licence Reference No. 626680	Pre-approval review: Revisions to address comments - May 2026 ARA Complete - July 8, 2025 For Submittal to MNR - June 2025
Plan Scale 1:3,000 (Arch D) SCALE 50 0 50 100 METRES	Plot Scale 1:3 [1mm = 3 units] MODEL Drawn By G.C./DGS File No. 18218A Checked By N.D.

File Name
OPERATIONAL PLAN
 Drawing No.
2 OF 4

Plate 6: Applicant's Sketch: Rehabilitation Plan

File No: ZN 4-25-08 (Soniusfield Farms Ltd.)

Part Lots 26-27, Broken Front Concession, 583398 Hamilton Road, Township of South-West Oxford

- This site plan is prepared under the Aggregate Resources Act (ARA) for a Class 'A' Licence for a pit below the ground water table (to 1m of the water table) and follows the Aggregate Resource of Ontario: Site Plan Standards August 2020 (Notes 60-68).
- Area calculations:
 - License Boundary: 49.4 ha (122.1 acres)
 - Limit of Extraction: 45.3 ha (111.9 acres)
- The rehabilitated landform for this site will be agricultural.

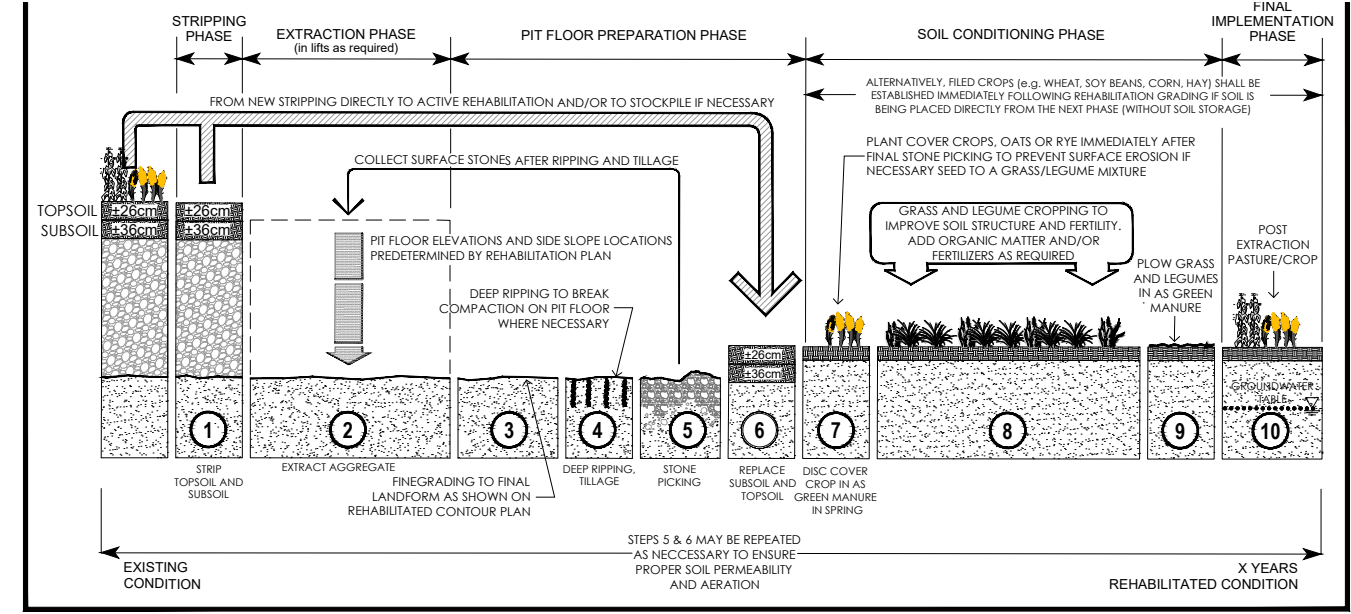
- #### B. Phasing
- As excavation reaches the limit of extraction and/or maximum depth in each phase, progressive rehabilitation shall commence.
 - Progressive rehabilitation will follow the direction and sequence of extraction identified on the plan view and described in the notes on page 2 of 4.
 - Each Phase of extraction shall undergo progressive rehabilitation in direct correlation to the development of the pit as the extraction limits in each Phase are reached and enough area is available to ensure that rehabilitation activities will not interfere with the production and stockpiling of aggregate materials. Internal haul roads are permitted to remain in progressively rehabilitated areas, where necessary, but shall be removed as part of final rehabilitation.
 - Progressive rehabilitation shall commence in Phase 1. Progressive rehabilitation shall closely follow the northerly direction of extraction in Phase 1 and Phase 3 and the southward and easterly direction of extraction in Phase 2.
 - Progressive rehabilitation activities will include grading and sloping, placement of overburden and topsoil, agricultural rehabilitation activities, and seeding of side slopes.

- #### C. Slopes and Grading
- Progressive rehabilitation will utilize a variety of rehabilitation techniques including:
 - Backfilling extraction faces;
 - Backfilling the pit floor;
 - Side slopes shall vary but will be a maximum of 10:1 and shall be created using on-site material and imported materials.
 - The 10:1 slopes shown on the drawing shall be created in phase 2 and 3 using on-site or imported material.
 - Access ramps shall be incorporated into the side slopes in the locations shown on the plan view. Ramps shall not exceed a 0:1 (horizontal to vertical) slope.
 - Importation of Excess Soil:
 - Excess soil as defined in Ontario Regulation 244/97, may be imported to this site to facilitate the establishment of the following rehabilitation:
 - side slopes and access ramps
 - top dressing to establish vegetation/agricultural crops.
 - Liquid soil, as defined in Ontario Regulation 406/19 under the Environmental Protection Act, is not authorized for importation to the site.
 - The quality of excess soil imported to the site for final placement must be equivalent to or more stringent than the applicable excess soil quality standards as determined in accordance with Ontario Regulation 244/97 as amended from time to time and must be consistent with site conditions and the end use identified in approved rehabilitation plan.
 - Where a qualified person is retained or required to be retained in accordance with Ontario Regulation 244/97, the quality, storage, and final placement of excess soils shall be done according to the advice of the qualified person.
 - Excess soil imported to facilitate rehabilitation as described on this site plan shall be undertaken in accordance with Ontario Regulation 244/97 under the Aggregate Resources Act, as amended from time to time.
 - The cumulative total amount of excess soil that may be imported to this site for rehabilitation purposes is 350,000 m³.
 - The final rehabilitated landforms established using the rehabilitation techniques mentioned above will consist of side slopes and a relatively flat floor (that allows for surface drainage across the rehabilitated field).

M. Technical Recommendations (from page 2 of 4)

- Natural Environment: "Bardoel Pit Natural Environment Report (NER)" March 31, 2025 (Source: MTE Consultants Inc.)**
 - As per the Novaterra Environmental Ltd. Hydrogeological Level 1 and Level 2 Assessment Report (2024), develop and implement a groundwater monitoring and contingency plan as required.
 - No extraction shall occur between the License Boundary and the Extraction Limit. Buffers (including berms) shall be seeded.
 - No extraction shall occur within 15m of the significant woodland to protect the candidate bat maternity trees. Buffers (including berms) shall be seeded.
 - Maintain a 15 m buffer from the woodland to protect the candidate bat maternity trees.
 - If minor vegetation clearing or pruning is required, avoid the work during migratory bird breeding season (April 1 to August 31) to ensure that no active nests are removed or disturbed, in accordance with the MBCA. If works are proposed during the breeding season, the area should be checked for nesting birds by a qualified professional prior to any vegetation removal or disturbance. If nesting birds are present, works in the area shall not proceed until after August 31 or until the nest has been confirmed inactive (e.g., young have fledged).
 - Major site grading activities during construction phases shall be timed to avoid breeding, nesting and migration periods of amphibians and turtles (i.e., generally April 1 to September 31). Site personnel should be advised to take particular care when working in this active period for wildlife and instructed how to respond appropriately to wildlife encounters.
 - Advise workers of potential incidental encounters with wildlife and the necessary protections. If an animal enters the work site, work at that location will stop and the animal should be permitted to leave without being harassed. If there are repeat observations of wildlife in the work area, barrier fencing may be used to direct wildlife away from active construction and toward natural areas.
 - Temporary berm slopes adjacent to the PSW and significant woodland shall be graded at 2:1 and vegetated immediately to prevent erosion and sedimentation into the features.
 - Prior to construction phases, robust sediment and erosion control fencing shall be installed along outer berm toe-of-slope adjacent to the PSW and the significant woodland. Erosion and sediment control fencing will act as a barrier to spills and disturbance that may impact the adjacent wetlands and woodlands, as well as aid in keeping existing vegetation intact. Sediment and erosion control fencing will be installed according to the Erosion and Sediment Control Guide for Urban Construction (TRCA, 2019).
 - Soil stockpiles shall be established in locations where natural drainage is directed away from the adjacent wetlands and woodlands. No soil should be stockpiled in close proximity to wetlands or the adjacent woodland feature to the east. If this is not possible and there is a possibility of any stockpile slumping and moving toward the edge of these features, the stockpiles should be protected with alternative sediment and erosion control measures. Access to the stockpile should be confined to the up-gradient side.
 - Sediment and erosion control fencing shall be inspected prior to construction and extraction operations to ensure it was installed correctly and during construction/extraction to ensure that the fencing is being maintained and functioning properly. Any issues that are identified are to be resolved in the same day.
 - Sediment and erosion control fencing shall not be removed until adequate re-vegetation and site stabilization has occurred. Additional re-vegetation plantings and/or more time for vegetation to establish may be required; however, two growing seasons are typically sufficient to stabilize most sites.
 - No heavy equipment, vehicles or other equipment is to enter adjacent natural areas. Limits of construction shall be delineated with Erosion and Sediment Control fencing prior to construction phases.
 - Implement Best Management Practices (BMPs) for all refueling, fuel, and lubricant storage and equipment maintenance activities.
 - Prohibit refueling and maintenance activities within 30 m of any waterbody.
 - Implement a spill contingency plan during construction.
 - Creation of suitable Bank Swallow habitat (e.g., soil stockpiles) during extraction should be avoided. Best management practices for deterring nesting during extraction activities shall be implemented (MNR, 2017). These measures shall include but are not limited to grading stockpiles, eliminating near vertical extraction faces, reducing slopes to 70 degrees or less beginning at the start of April until at least July 20 of any year.
 - All necessary lighting for operations shall be directed downward and directed away from the adjacent PSW and significant woodland features.
 - Boundaries of the extraction limits and license boundaries adjacent to the natural heritage features are clearly staked prior to construction phases. Monitoring shall occur during all construction phases to ensure boundaries are respected and the adjacent natural features remain unaffected.
 - Ongoing weekly ESC monitoring shall occur for the duration of construction phases (e.g., berm construction and deconstruction) to ensure ESC measures are installed and maintained in good condition, including the establishment of seeding on the outer berms.

- Hydrogeology: "Hydrogeological Level 1 and Level 2 Assessment Proposed Bardoel Pit" March 20, 2025 and "Maximum Predicted Water Table Report" March 2025 (Source: Novaterra Environmental Limited)**
 - Fuel storage onsite shall be in compliance with the Technical Standards and Safety Act 2000 and the Liquid Fuels Handling Code 2001, as may be amended.
 - Maintenance and refueling of mobile excavation equipment and other vehicles shall take place in the fuel storage area. Crushers, stackers, and screening plants shall be refueled and maintained on the pit floor during daylight hours. Any minor drips or spills shall be immediately cleaned up and properly disposed of.
 - The Licensee shall ensure that a spill contingency plan is developed prior to any operation of the pit and followed during the operations.
 - The monitoring program shall consist of twice-annual (Spring and Fall) water level measurements at six monitoring wells (MW1, MW2, MW3, MW4, MW5 and MW6) and one staff gauge (SG1). Monitoring wells shall be maintained until the operation is completed and the site is rehabilitated.



- #### D. Topsoil and Overburden
- All on-site topsoil and overburden shall be used in progressive and final rehabilitation.
 - Refer to Agriculture notes (see note M, 'Technical Recommendations' on this page for details regarding the handling and placement of topsoil and overburden.

- #### E. Drainage
- The final surface drainage will follow the rehabilitation contours and directional arrows shown on the plan view.
 - A surface water collection area shall be located in Phase 3.

- #### F. Agricultural Rehabilitation
- Within the extraction area, 45.3 ha shall be returned to an agricultural condition (in accordance with the "Pit Floor Agricultural Rehabilitation Sequence" detail on this drawing) with an average soil capability classification of CL1 Class 2. The areas returned to an agricultural condition shall consist of the pit floor and maximum 10:1 slopes.
 - The technical recommendations from the Agricultural Impact Assessment, included in note N.1, shall be implemented during progressive and final rehabilitation to restore 45.3 ha of the extraction area to an agricultural condition.

- #### G. General
- All equipment shall be removed from the site.
 - No buildings, structures or haul roads will remain on site.
 - Access ramps shall remain to access the rehabilitated floor.
 - The final maximum predicted water table varies between 268.35 masl in the northern portion of the site and 285.56 masl in the eastern portion of the site. The maximum predicted water table is shown in each cross section on drawing 4 of 4.
 - The final end use is agricultural.

- After issuance of the pit license, an initial report summarizing baseline conditions at the site shall be prepared and shall include all monitoring data up to the end of the calendar year in which the license was issued, and shall be submitted to the MNR. Subsequent monitoring data collected at the site shall be regularly reviewed to assess changes to hydrogeological conditions and shall be reported to the MNR only if major changes are observed; otherwise, the data will be made available to the MNR upon request.
- If complaints regarding groundwater interferences are received, the "Water Supply Interference Complaint Response Procedures" shall be followed and the licensee shall take appropriate measures as deemed necessary by the MECP and/or MNR to rectify the problem(s).

- #### 3. Archaeology: "Stage 1-2 Archaeological Assessment Proposed Aggregate Pit Bardoel Farm" April 10, 2024 (Source: TMHC)
- The Stage 2 assessment resulted in the identification of archaeological material in four locations, none of which qualify for Stage 3 assessment based on provincial criteria. As such, the subject property is considered free of archaeological concern and no further archaeological assessment is recommended. Should the licensing area change to encompass new lands that have not been subject to survey in this study, further archaeological assessment will be required prior to licensing approval.

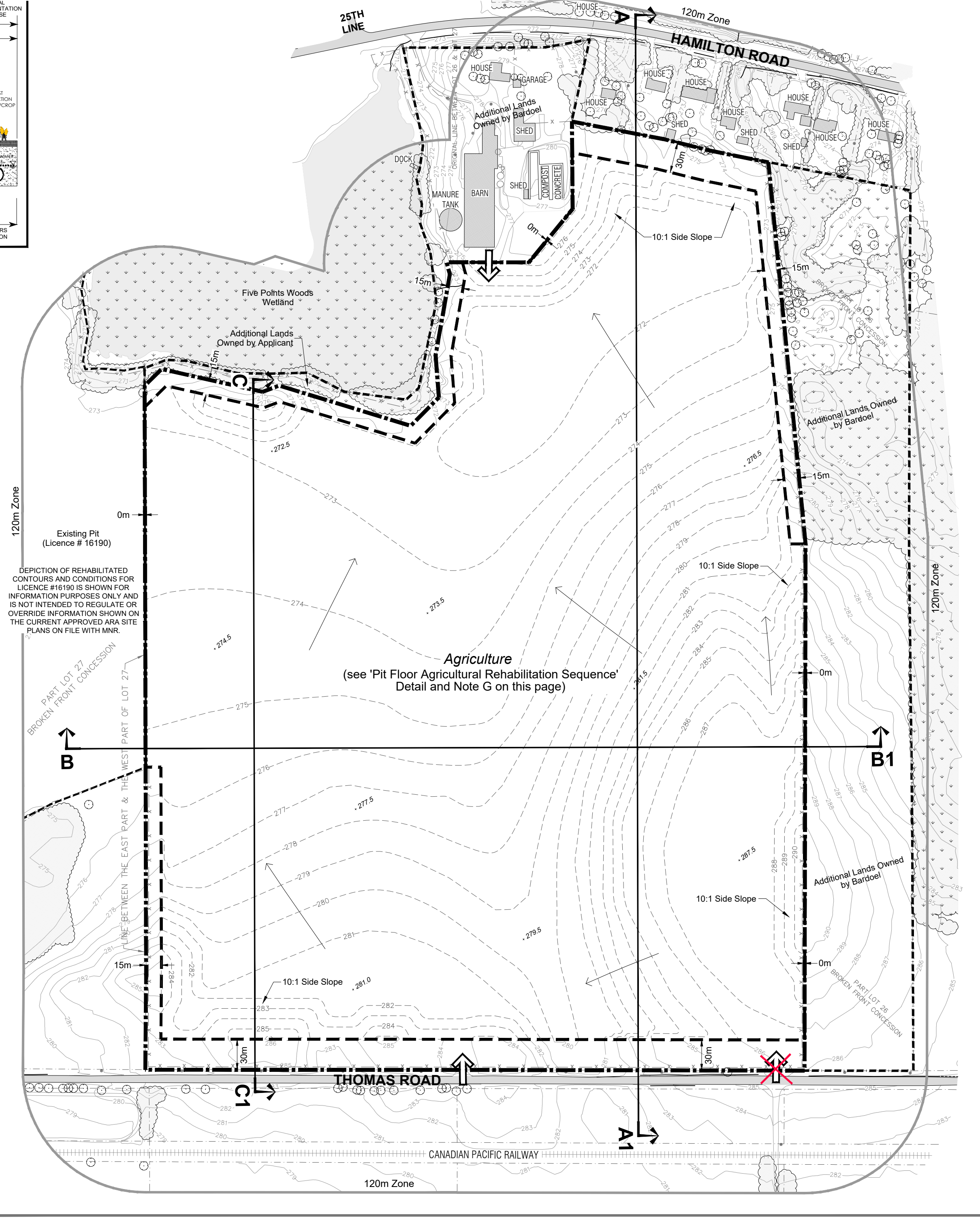
- #### 4. Acoustic Assessment: "J-AAR Bardoel Farm Pit Acoustic Assessment" March 28, 2025 (Source: RWDD)

a. In summary, the following berms shall be required:

Berm	Minimum Height	Timing
B1	5m	Prior to Phase 1
B2	4m	Prior to Phase 2
B3	6m	Prior to Phase 1
B4	5m	Prior to Phase 1
B5	4m	Prior to Phase 1
B6	3m	Prior to Phase 2
B7	6.5m	Prior to Phase 3
B8	6m	Prior to Phase 3

- Berms constructed in previous extraction phases will remain for the subsequent phases.
- Crushing and screening activities are required to operate within the Processing Plant Region shown on the Sequence of Operations. Berms are required around the processing plant to further reduce sound levels at the receptors. These berms are required to be 8 m high. The berms must at least break line-of-sight and surround the plant on all sides except for an open section to allow for incoming and outgoing haul trucks. An example of the shape of the processing plant berm is shown in Figure 3 for scenario N1 in the Acoustic Assessment. Examples for the other scenarios are presented in Figure D1 of Appendix D.
- A berm is required to be solid, with no gaps or opening, and shall satisfy a minimum face density of 20kg/m². It could take the form of an earthen berm, acoustic barrier, stockpiles, working face, or a combination satisfying the requirement of a berm. Berms shall at least break the line-of-sight to the receptors.

- #### 5. Agricultural Impact Assessment: "Agricultural Impact Assessment - Proposed Bardoel Pit" June 2025 (Source: MHBC)
- The following recommendations are made to reduce the impacts of the proposed pit on the surrounding agricultural uses in the Primary and Secondary Study Area. Recommendations are also made for final and progressive rehabilitation to ensure the pit is returned to the same average soil capabilities and agricultural condition as pre-extraction:
- Extraction will occur in phases to minimize the amount of disturbed area. Later phases of the operation that are not currently in extraction should remain in agricultural production for as long as realistically possible.
 - Agricultural rehabilitation shall be in accordance with the agricultural rehabilitation sequence schematic on the Rehabilitation Plan to ensure best practices are followed throughout the progressive rehabilitation of the pit.
 - Prior to the commencement of stripping, agricultural baseline conditions shall be established by a qualified professional for the entire extraction area, using an accredited lab for any analytical testing. Soil inspections shall be conducted at a density to allow for sufficient coverage of the area. The parameters for the baseline conditions soil testing shall be determined by the qualified professional and shall include items such as soil macro and micronutrients, soil chemistry (e.g., pH, etc.), organic matter, soil texture and structure and bulk density.
 - Progressive rehabilitation procedures that avoid substantial storage of topsoil and minimize the storage of subsoil shall be implemented. Stripped soils, not required for berm construction, shall be moved directly to depleted areas where they will be immediately used for agricultural rehabilitation. Stripping areas shall be limited to what is required for the season of operation.
 - During pit operations, access to the agricultural rehabilitation areas and undisturbed areas used for agricultural purposes will be maintained.
 - Topsoil and subsoil shall be replaced across the site at approximately the same pre-extraction depths as documented in the DBH Soil Report, 2024. For areas of the site to be returned to an agricultural condition, the minimum topsoil depth to be replaced will be 26 cm and the minimum subsoil depth to be replaced will be 36 cm.



- Soil will be handled under suitable conditions. Travel over soils and rehabilitated areas shall be minimized to reduce compaction. Ripping / filling the soil will occur, where necessary, to alleviate soil compaction and shall avoid the mixing of soil materials / layers during the process.
 - Once grading is completed, a vegetation cover (such as perennial crops) shall be immediately established within the agricultural rehabilitation area in order to reduce erosion, add organic matter to the soil and improve soil structure. A grass-legume cover crop shall be established throughout rehabilitation and maintained for up to five years and ploughed under annually in order to promote and increase organic matter. Alternatively, field crops (e.g. wheat, soy, corn, hay) shall be established immediately following rehabilitation grading.
 - After final rehabilitation, soil testing shall be completed by a qualified professional to analyze soil conditions to demonstrate that pre-extraction soil capability (CL1 Class 2 soil capability) has been restored. Adjustments to cropping practices and/or soil amendments may be required based on the results of the soil testing and shall be undertaken in consultation with the property owner. A report shall be submitted by a qualified professional following final rehabilitation and provided to MNR prior to Licence surrender to demonstrate that the agricultural area has been rehabilitated back to the pre-extraction soil capability (CL1 Class 2 soil capability).
 - Best management practices shall be implemented with respect to the storage and application of organic material, fertilizers, and pesticides.
- #### 6. Traffic: "Traffic Impact Study - 583398 Hamilton Road" October 2024 (Source: Strik Baldinelli Moniz Ltd.)
- The site access location meets minimum sight distance requirements, however, it is recommended that the small trees and brush in the Hamilton Road right of way within 10 m of the south edge of pavement along the frontage of the site be removed in order to ensure their foliage does not obstruct the sightline to the east of the site access.
 - No road improvements are required to accommodate the proposed gravel pit.

Legal Description

Pt Lt 26-27 Con Broken Front West Oxford, Township of Southwest Oxford Oxford County

Legend

- Boundary of Area to be Licensed
- Additional Lands Owned by Bardoel (Lessor)
- Existing Licensed Boundary Licence #16190
- Contour with Elevation METRES ABOVE SEA LEVEL
- Existing Fence 1.2m POST & WIRE FENCE UNLESS OTHERWISE NOTED
- Existing Vegetation
- Public Road
- Building/Structure LOCATION AND USE FOR BUILDINGS ON-SITE AND WITHIN 100M ARE SHOWN ON THIS PAGE
- Farm/Field Access
- Cross Sections A1
- Limit of Extraction ALL SETBACKS ARE DRAWN TO SCALE AND SHOW LABELED DISTANCES
- Proposed Contour and Elevation METRES ABOVE SEA LEVEL (MASL)
- Proposed Elevation RAHABILITATED ELEVATION (MASL)
- Direction of Surface Drainage
- Candidate Significant Wildlife Area

Site Plan Amendments

No.	Date	Description	By

200-540 BINGEMANS CENTRE DR, KITCHENER, ON, N2B 3X9 | P: 519.576.3650 | WWW.MHBCPLAN.COM

MNR Approval Stamp

Stamp

J-AAR Materials Limited

3003 Page Street London, Ontario N5V 4J1 Tel: (519) 652-2104

Applicant's Signature: Kevin Aarts, J-AAR Materials Limited

Bardoel Pit

ARA Licence Reference No. **626680**

Pre-approval review:

- Revisions to address comments - May 2026
- ARA Complete - July 8, 2025
- For Submittal to MNR - June 2025

Plan Scale 1:3,000 (Arch D) SCALE

Plot Scale 1:3 [1mm = 3 units] MODEL

Drawn By G.C./DGS File No.

Checked By N.D.

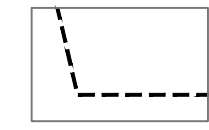

REHABILITATION PLAN

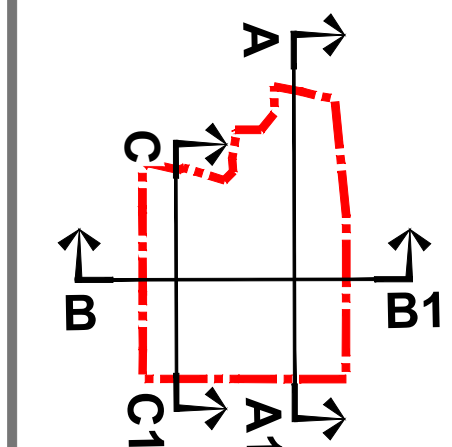
3 OF 4

Legal Description

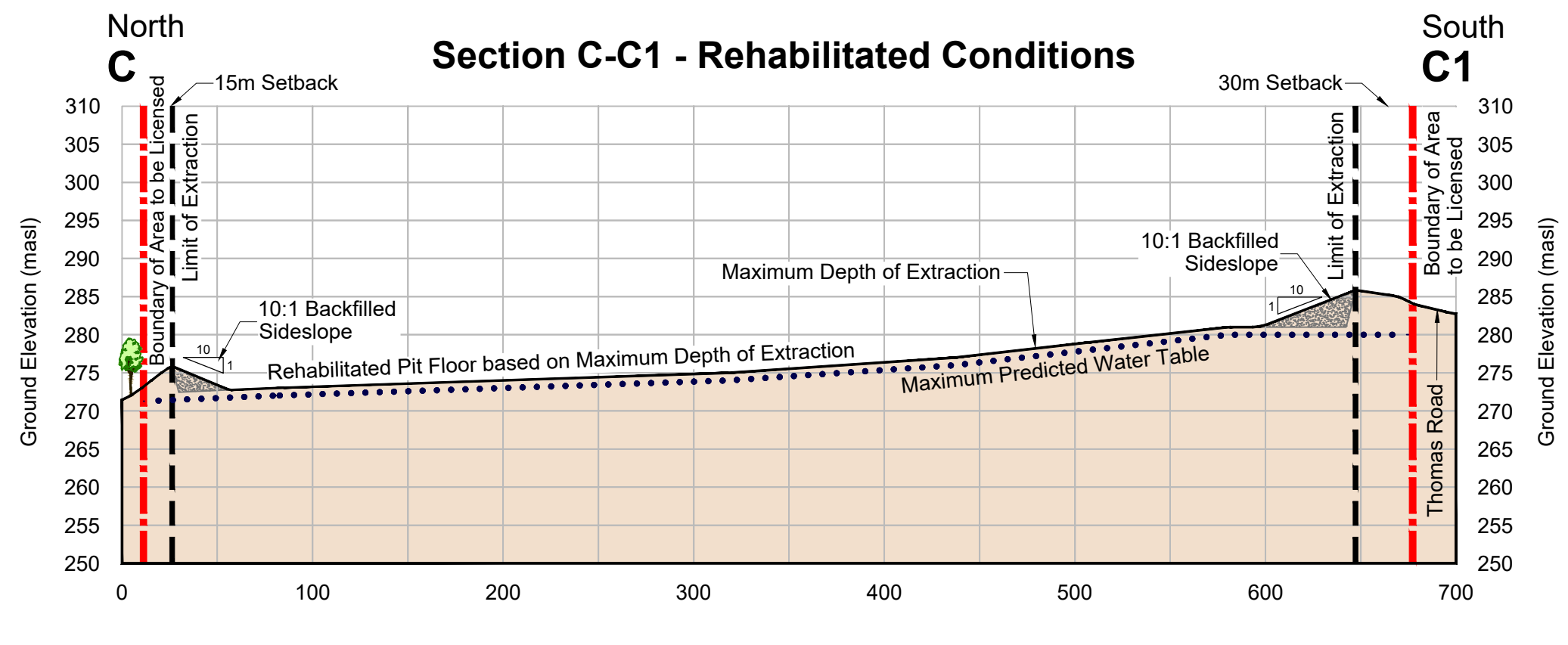
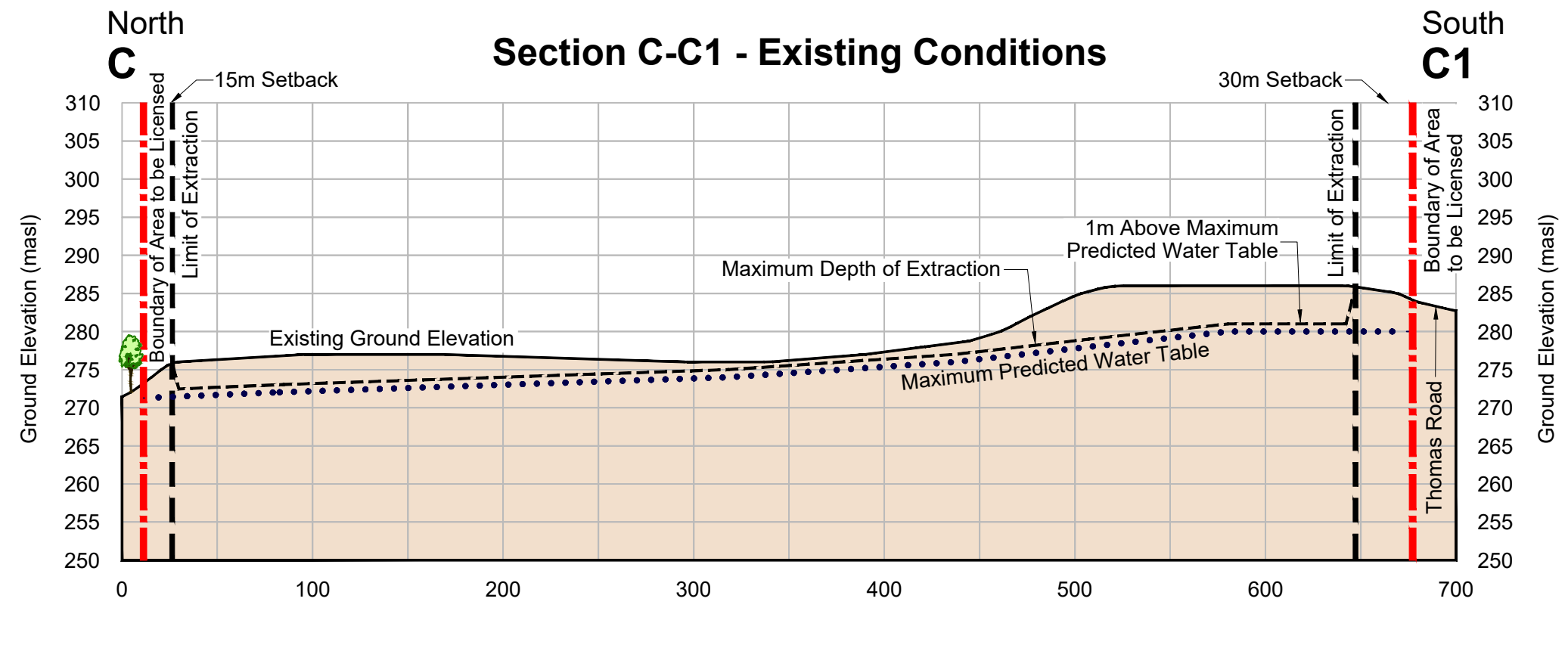
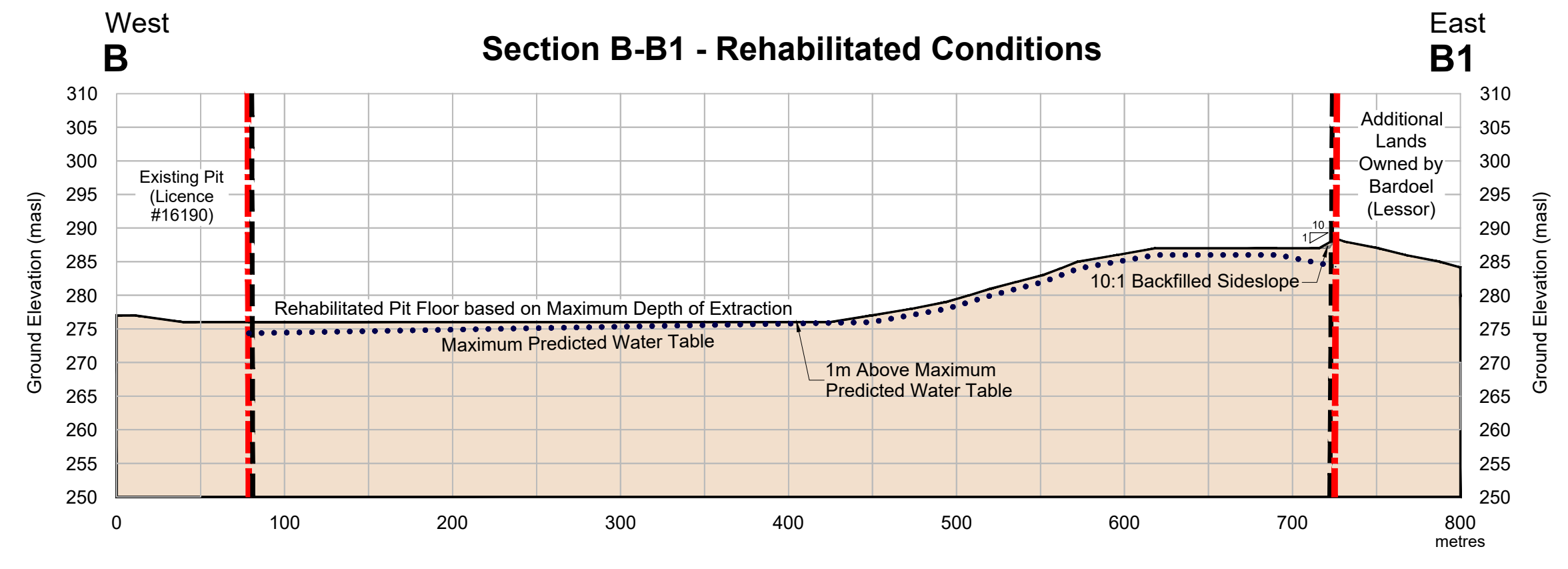
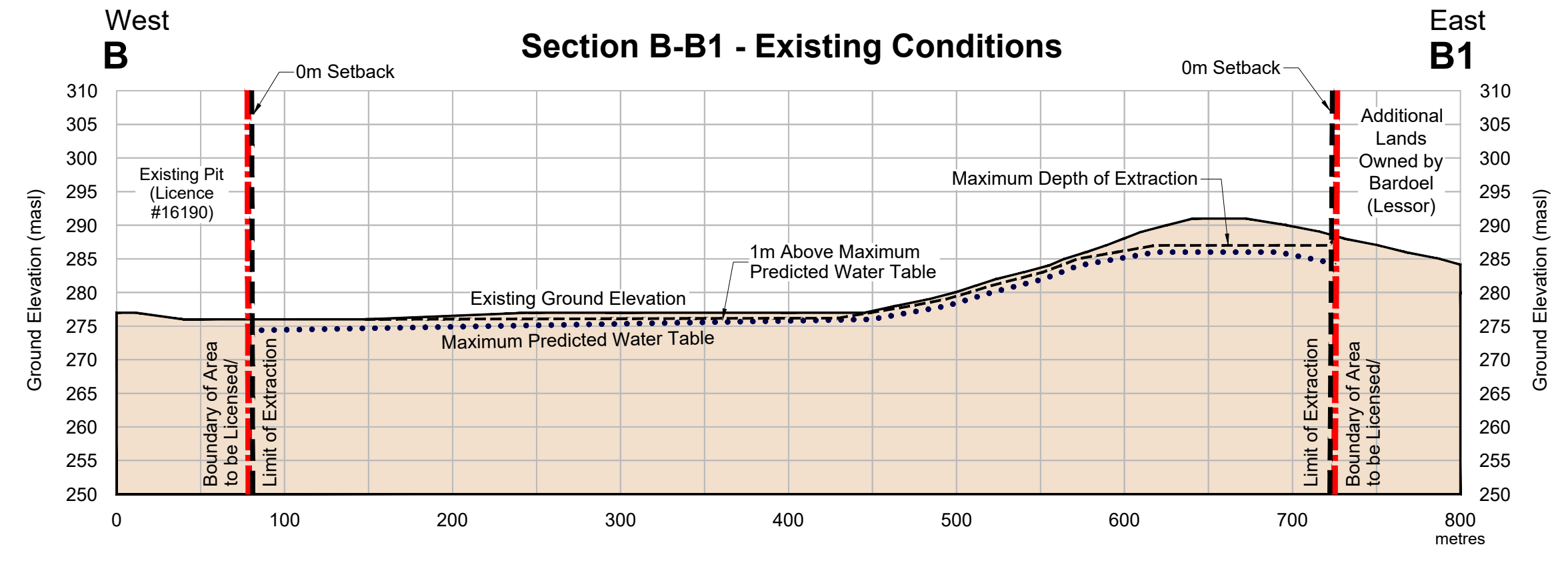
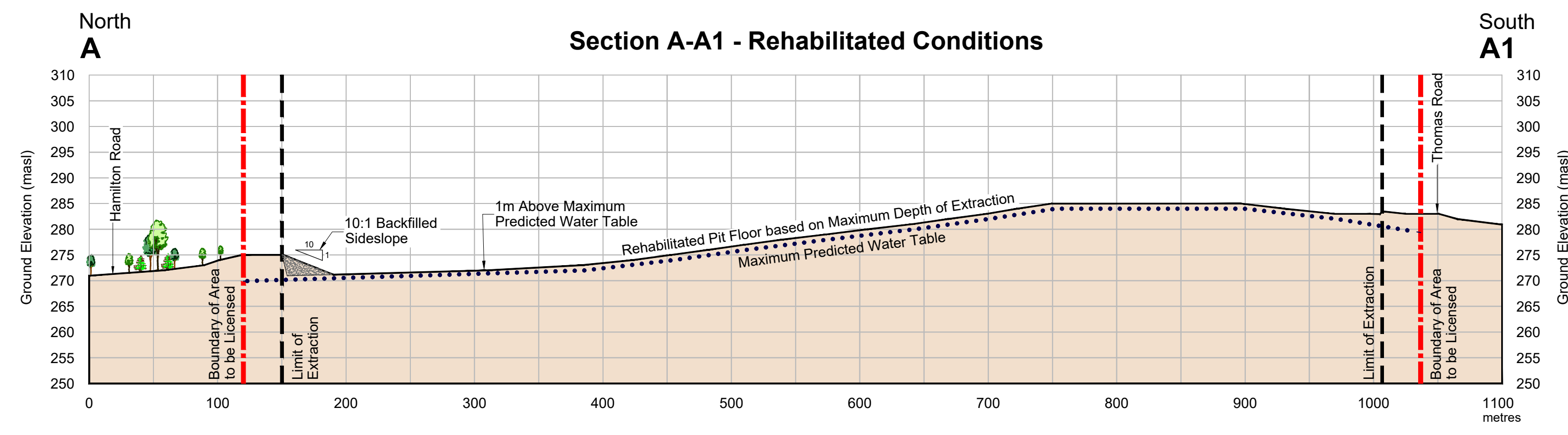
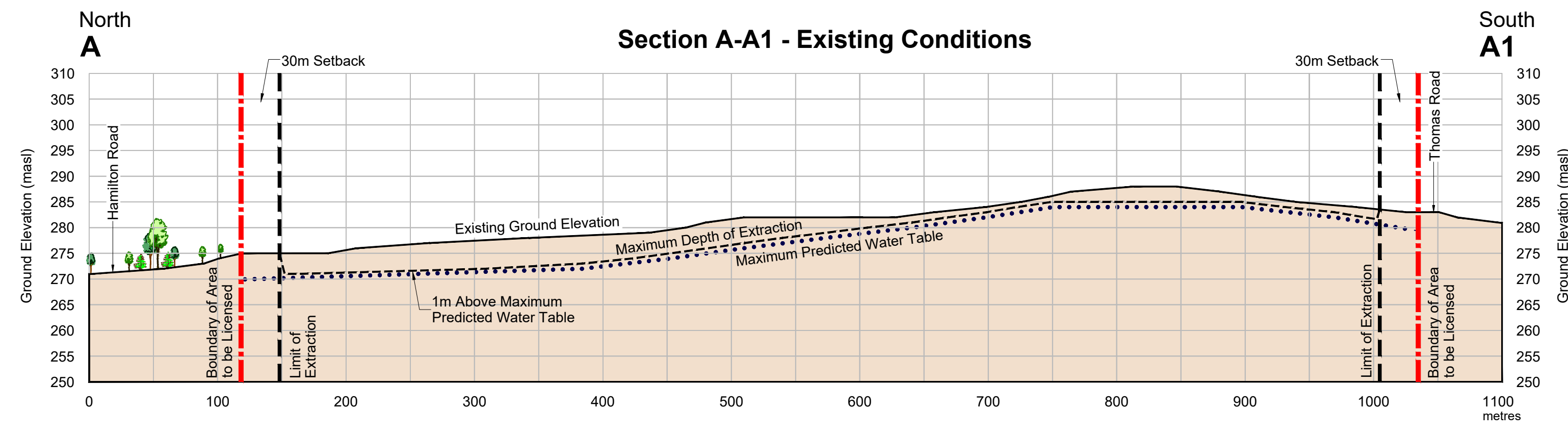
Pt Lt 26-27 Con Broken Front West Oxford,
Township of Southwest Oxford
Oxford County

Legend

-  Boundary of Area to be Licensed
-  Limit of Extraction
-  Maximum Predicted Water Table
-  Maximum Depth of Extraction
-  Vegetation/Trees




Cross Sections
SEE PAGES 1, 2 & 3 OF 4 FOR
PLAN VIEW LOCATION OF CROSS SECTIONS



For all Cross Sections
Horizontal Scale - 1:3,000
Vertical Scale - 4x Exaggeration

Site Plan Amendments

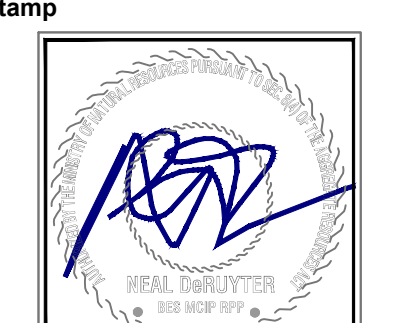
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**PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE**


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MNR Approval Stamp



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3003 Page Street
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Tel: (519) 652-2104

Applicant's Signature



Kevin Aarts
J-AAR Materials Limited

Project
Bardoel Pit

ARA Licence Reference No.	Pre-approval review:
Plan Scale: 1:3,000 (Horizontal) / 4x Exaggeration (Vertical)	Plot Scale: 1:3 [1mm = 3 units] MODEL
Drawn By: G.C./DGS	File No. 18218A
Checked By: N.D.	

Appendix A
ZN 4-25-08: Public Comments

Good morning,

I'm writing to inform you that the gravel pit proposed for southwest Oxford property [REDACTED] is a potential disaster. It not only will destroy home values in our neighborhood and families quality of life and their right to enjoy their property but the environment is at risk. Water pollution, natural habitat of many species of animals, including the nesting area of breeding bald eagles. Gravel companies have kms of southwest Oxford destroyed. Their record of being honest and returning the land to its original condition is pathetic. I don't trust them, period. There are a number of gravel operators sitting idle and not even working existing pits and for some reason we need to destroy people's lives, their property values and our environment so a few people can get rich? Is this what swo, is all about . I haven't had a single office or mayor show any interest in the proposal which seems quite strange. If swo needs aggregate their is plenty already available. If another municipal region needs it maybe their better off destroying their backyard. Gravel companies have dug into our water table, used an asphalt mill, that sickened residents and was illegal ,and haven't properly maintained the berm around existing pits. Leading to my next question, why do we believe a word they say now? There is expansion in the town of Ingersoll, and it will border this ill-advised gravel facility and be a health risk to the 200 or so homes being built, that hard working families hopes and dreams will be destroyed. Maybe take a drive out here and see for yourself the utter destruction that's all ready be hoisted upon our friends and neighbors. How much can we take? Do we really deserve this, for a few people to get rich ? Habitat for frogs, turtles, beaver, hawks, eagles, otters, groundhog, and many other species are at risk. Is global warming real or do we just say it is and destroy our environment and shake our heads and say oh well. Maybe saying no to this disaster of an idea is the first step in showing Oxford county cares about the environment. Sadly I doubt this letter will make any difference, they seem to be working on getting ready to start the ground work before it's even voted on. When Ingersolls ground water, which is drawn from the area of this environmental catastrophe becomes unusable in the future there will be a record of my complaint and I hope it will help. In closing, I'm just a retired resident who was hoping my family, friends , neighbors, and new neighbors would enjoy this area as I have for 63 years. Sadly, it seems, this will get rammed through and again common people with hopes and dreams will be left out in the cold as usually happens when big companies flex their muscles. Hope this has some bearing on your decision.

Best regards, from a very tied and disappointed resident, of a once beautiful area of SWO.

Edward Langford.
[REDACTED]

Good afternoon.

Please note my concerns regarding the gravel pit licensing proposal in SWOX.

This proposal came to my attention from my neighbors.

Unsure if any reps from SWOX was there at the town meeting in Salford?

First and foremost, thank you for allowing this opportunity to discuss my concerns.

We moved to SWOX from Ingersoll, as subdivision after subdivision were being built behind our old house.

This peaceful retreat, so we thought in SWOX will now become a gateway to non-stop trucks, increased potential for speeding, increased potential for accidents, dust, noise, and frustration.

We need to listen and understand the reality of this proposal and look between the lines and the cracks for those that cannot speak.

What about the potential threat to wildlife, the swans, geese, ducks, turtles, fish, hawks.....

What about the potential threat to our well systems. We live at 583361 Hamilton Road, so what really will take place if the well is compromised....unsure but sounds like nothing.

The agents for this proposal at the Salford Hall were very well coached, well versed, and knew how to turn you to an alternate member for discussion.

They are well informed, unlike myself, so I am learning very quickly.

What really is this about? Is it business, money, employment. Were there any other proposed sites?

Why this particular area? I don't know, do you? If so please advise.

I personally do not believe this will be beneficial for our area in SWOX.

There will be much unhappiness if this were to move forward.

The unknown of risks seem high to me.

Would you want this in your back yard or across the street?

Thank you for your time and efforts.

Dave Cecchin

Shipping Receiving Manager

Nifast Canada Corporation



Bardoel Pit ARA Application #626680
Oxford County File #ZN4-25-08
Re. Soniusfield Farms Ltd.
Applicant J-AAR Materials Ltd

December 15, 2025

Please enter the following comments and suggestions into the records for the above application.

1. Patricia and Terry Harrison are opposed to the proposed gravel pit application in our residential neighbourhood.

2. If this is to be approved, there are changes to the application that must be made to accomodate everyone's safety and quality of life.

(A) Main entrance and exit to be from Thomas St. to the south end of the proposed gravel pit. This is an existing gravel road and will need to be upgraded to accomodate large truck traffic. This will be needed anyway to accomodate the new industrial land recently aquired by the Town of Ingersoll. How about the applicant, Township of Southwest Oxford and Town of Ingersoll work out a deal to have this road upgraded by the applicant as part of the approval and all parties benefit. Work together for the common good

(B) An alternate route for entrance and exit be at 583324 Hamilton Rd. arranged through the existing gravel pit to the west (now not used). This would require J-AAR to negotiate with that owner but the pit is no longer active and should be possible. This would eliminate a lot of local frustration to the local residences and be a lot safer for all.

(C) Hamilton Road is the designated EDR for 401 traffic, in case of accidents or road closure. This occurs a lot and at any time. This adds more reason to use Thomas St. as main route for the truck traffic.

(D) The proposed berm along the residential housing on Hamilton Road should be maintained by J-AAR to keep the grass cut similar to what they do at their own pit on Victoria St (Rd 60)

(E) Hours of operation for the heavy equipment should be restricted to 8:30 a.m. to 5:00 p.m. Monday to Friday

(F) Dust control is a must, particularly for phase 3.

(G) The application to be ammended to "above water table only " to avoid any issues, this is not for the applicant to dictate but for the county to rule.

(H) The applicant to commit to an accelerated time line to get the gravel pit done and restore the land to agricultural state in 6 years. This would allow 2 years per phase which should be enough time for a serious contractor. No extensions

(I) Provide a bond in the amount of \$10 million to provide a guarantee the project will be completed to the satisfaction of the county, and on time

(J) Since this aggregate resource is in the county of Oxford, Township of SW Oxford, we should have a preferred rate and option to obtain materials for use on local roads and needs in our community. In fact, right in the proposed subdivision less than 1/2 mile away, as well as the local industrial lands

(K) Property values in the immediate vicinity, will no doubt be adversely affected and this reinforces the need to have the gravel pit operation be as short of duration as possible with no extensions, if approved at all.

I am disappointed that we have not heard from our local SW Oxford council rep on the matter, as he is supposed to be acting in our interests. After all, he was elected by us. Maybe we should rethink our vote next election.

This should not be a rubber stamp approval by the county planning Dept. and just look at the existing gravel pits in this area that have been left in an abandoned state. How would you like a gravel pit in your back yard?

We have not received any response of any of our previous written or verbal questions on the proposed gravel pit application or from the public meeting session which no one gave any answers
When can we expect a written response?

Terry Harrison
[REDACTED]

Good morning Laurel,
Being property owners [REDACTED], we are concerned about the impact of the large gravel truck traffic, the noise, the dust and multiple eco issues that this new site will have on our home and property values. Not to mention the damage to the landscape. It will be an eye sore that we will have to endure for the upcoming years. There are multiple gravel pits in the area, is it necessary for another more intrusive one? We will be at the meeting at the Community Ctr., Nov 6.

Regards,

Randy and Robin Naisbitt
[REDACTED]

Good Afternoon,

The *Natural Environment Report* prepared for this application focuses on ecological features — wetlands, wildlife, and vegetation, and although I don't think it captured how special this bio-diverse eco system is, it **does not address the people** living near the Site.

There's **no data** on how many families, children, seniors, shift workers, or residents with respiratory conditions live in close proximity of the proposed pit.

And there's **no human-health risk analysis** for dust, diesel emissions, noise, or vibration that would occur six days a week from 7 a.m. to 7 p.m.

Under Ontario's *Environmental Bill of Rights* and the Ministry of Natural Resources and Forestry's own **Statement of Environmental Values**, the government must consider the *cumulative effects on human health and well-being* before granting a licence. Without that information, this process is incomplete.

I'm asking that Council and the Ministry require:

1. A full **Human Health and Socio-Economic Impact Assessment**, and
2. That this assessment be released publicly before any approvals

Residents have a right to understand how this pit could affect their air, sleep, and quality of life.

I'm simply asking that our community's health be given the same attention as its gravel.

Thank you for your time in considering this request.

Truly

Jeanette Nooren

Objections to Re-zoning

regarding file No. ZN-4-25-08 by Soniousfield Farms Ltd.

1. **Dust** – Dust from the site blowing toward our property will contain fine Silica particulate matter of 10 microns or less. This dust is considered toxic under the Canadian Environmental Protection Act and the Ontario Occupational Health and Safety Act. These particles can lodge in the lungs causing major contributing factors to respiratory and cardiovascular diseases. Due to the fact that our property is located north of the proposed development and prevailing winds in our area (Weather Network) are from the southwest we would be subject to the adverse effect of particulate matter from the site.



Pit picture taken August 22, 2025 Hamilton Road just outside of Putnam. This dust is from only one loader operating in the pit.



Picture taken September 16, 2025 Road 68. Truck at pit entrance road.

2. **Noise** – Crushers, stacking belts, loaders, backup beepers, trucks and diesel gensets will all contribute to noise levels from the site. Again, due to the location of our property to the site and prevailing winds from the southwest constant noise will be refracted towards our property.

County of Oxford Official Plan

**HEALTH, SAFETY,
POLLUTION RISK**

Where concerns have been expressed as to the impact a proposed use may have on the environment, Area Council may consult with appropriate Provincial agencies and will be satisfied that any such impacts or risks of impact can be appropriately mitigated through Federal or Provincial legislation requirements and associated regulations prior to permitting such use. Area Council may not permit industrial uses or *development* when such consultation indicates that the use represents a significant health or safety risk to the public, employees or the environment by reason of pollution or other adverse environmental impact.

LOCATION

Industrial areas or uses within the Village or Serviced Village designation will be consistent with the following locational policies:

**SEPARATION FROM
RESIDENTIAL USES**

Industrial areas or uses will be sufficiently setback from residential uses in the general vicinity to mitigate potential conflicts resulting from noise, dust, vibration, odour or vehicular traffic associated with the industrial activity. Industrial areas or uses will be protected from encroachment by non-compatible uses.

INTERVENING USE

Where feasible, industrial and residential uses will be separated by an intervening use such as service commercial or institutional uses which are compatible.

Exert from the County of Oxford Official Plan would pertain to the hazards and conflicts of the dust and noise.

3. **Property value** – The proposed zone change will greatly decrease our property value. Studies show that properties adjacent to a gravel pit have decreased in value in relation to the proximity of the operations. Here is just one such study that shows that impact. We are a retired couple that have included the value of your residence in our financial retirement plans. Due to the proposed zone change we will experience a reduction in our property value by a minimum of 25%. Taking into account the size of our lot, house, shop and amenities and estimated value of \$980,000 our property could depreciate \$245,000 or more.

Her model controls for a large set of other unit and location specific factors so that she can focus solely on the effect of the proximity of the gravel mine on home sale price.

George E. Erickcek of the W.E. Upjohn Institute for Employment Research recently used Professor Hite's model to assess the potential impacts of the proposed Stoneco Gravel Mine in Richland Township, Michigan on property values in the area.⁷ Exhibit 6 (below) recreates a chart contained in Erickcek's assessment based on Hite's model. Exhibit 6 relates the impact of distance from the gravel pit on property values. The chart below differs from that in the original publication in that distance in Exhibit 6 is measured in kilometres as opposed to being measured in miles in the original.

Exhibit 6 (below) reveals that properties closest to the gravel mine faced the largest value declines, and that property value declines diminished with distance from the mine:

- Properties within 0.5 kilometres of the mine dropped in value by 25 percent or more.
- The decline 1.0 kilometre away was between 15 and 20 percent.
- The decline 1.5 kilometres away was just under 15 percent.
- The decline 2.0 kilometres away was just over 10 percent.
- The decline 3.0 kilometres away was just under 10 percent.
- The decline 4.0 to 5.0 kilometres away was between 5 and 7 percent.

It is important to note that these impacts are permanent. While it is true that properties within a 2 kilometre or 5 kilometre radius of the proposed site will increase in value in the future in line with increases in average property values in general in the broader area, it is equally true that the gap in values resulting from the negative impact of the quarry persists over time.

The average negative impact on property values within a 2 kilometre radius of the site was 19 percent.

The average impact within a 5 kilometre radius was 8 percent.

- 4. Drainage** – Water from the proposed site will have a direct impact on our property during the spring runoff and during heavy rainstorms. Currently the water flows through the low section of our back lawn to the culvert on Hamilton Road and then into the Thames River. Any changes to this area within this drainage path may have a negative impact on our property.



June 28, 2025 our backyard.

5. **Quality of Life** – my wife and myself moved to your current residence from Ingersoll with full knowledge of the agricultural operations adjacent to our property. Both of us come from farm backgrounds and recognized that for a few weeks in the spring and fall there would be dust and noise periodically as crops are planted, harvested and manure spread. These operations impact our daily activities for a short duration and we accept this willingly. The proposed activities of the gravel extraction will be from Monday to Friday 7:00 am to 7:00 pm and Saturday from 7:00 am to 1:00 pm. Since we are retired, we enjoy being outside on our property during the day almost every day. The proposed timeframe and type of operations will greatly affect the enjoyment of our property.

Other concerns:

- No other pits that have been approved in the area have been directly adjacent to existing residential clusters. In most cases properties affected

by these operations are the land owners who are being compensated financially.

- Proximity to the Oxford County Municipal water source at the corner of Hamilton Road and Meatherall Road.
- Traffic impact of aggregate trucks entering and exiting Hamilton Road with reduced site lines.
- Impact on Five Points Woods Wetland.

Conclusion:

- As adjacent property owners we object to this re-zoning change.

Note: some of the reference material has been taken from reports and studies on the internet. I have made every attempt to ensure accuracy and authenticity of this material.

John Phillips



Good morning,

I received a notice of receipt regarding the proposed rezoning to accommodate the extraction of minerals. The letter was quite concerning to me as someone who would be living [REDACTED] to what sounds to be an industrial operation. This presents the possibility of significant negative effects to every day life in regards to the noise, dust and debris, increase in truck traffic as well as environmental concerns.

Can you please provide additional context on the status of the application, the typical process and where we are currently in the process?

It's my understanding that there would be studies conducted on the impacts to neighbouring residents and the environment? If yes are these reports available to the public?

Also can you please let me know the date of the public meeting? I'm concerned if the notice is sent by mail there is the chance it will not be delivered with sufficient notice with ongoing Canada Post negotiations.

I look forward to your reply.
Kind regards,

Melissa

Dear Oxford County Planning and Public Works Staff,

I am writing to formally request that **Oxford County reject the proposed Bardoel Pit at 583398 Hamilton Road**. The proposal directly encroaches into multiple zones of the **Wellhead Protection Area (W3)** for the Hamilton Road municipal well, threatens the integrity of the Five Points Woods PSW Pond, and places industrial extraction immediately behind long-established rural homes. Taken together, these risks make the project incompatible with County responsibilities for land-use planning, drinking water protection, and environmental stewardship.

1. WHPA Encroachment Warrants Rejection

The current pit design overlaps with:

- **WHPA-C (5-year time-of-travel)**
- **WHPA-D (25-year time-of-travel)**
- and lies just south of **WHPA-B (2-year time-of-travel)**.

The ARA Plan also proposes excavation **to within 1 metre of the water table**—a practice that can significantly alter groundwater movement, increase turbidity, and reduce natural protective overburden. This level of disturbance within vulnerable aquifer zones is incompatible with the County's obligation to protect municipal well W3.

For these reasons alone, the proposal should not proceed.

2. Incompatibility With Adjacent Residential Uses

The GLIMR zoning map identifies the nearby Hamilton Road properties as **Residential Existing (RE)**. Yet the proposed pit would operate directly behind these homes, subjecting families to:

- chronic noise,
- dust and particulate pollution,
- structural and sensory vibration,
- heavy truck traffic and safety concerns.

This represents an unacceptable land-use conflict and violates the expectations of rural residents who rely on County planning policies for protection.

3. Threat to the Five Points Woods Provincially Significant Wetland (PSW) Pond

The pit borders the Five Points Woods PSW Pond, a sensitive wetland dependent on stable groundwater and surface-water interactions. Extraction near this feature risks:

- destabilizing wetland hydrology,
- impairing ecological function, and
- degrading habitat for wetland-dependent species.

County environmental policies mandate strong protection of PSWs. This proposal contradicts those objectives.

4. Risks to Private Groundwater Wells

Many residents along Hamilton Road depend entirely on private wells. Excavation close to the water table creates clear risks of:

- turbidity and suspended fine materials entering groundwater,
- long-term water quality degradation,
- disrupted recharge and aquifer performance.

These impacts can be irreversible, leaving residents with no viable remedy.

5. Request for County Action — REJECT the Proposal

Given the cumulative risks to municipal infrastructure, private wells, rural households, and the PSW, I respectfully request that Oxford County:

1. **Reject the proposed Bardoel Pit in its current form**, based on WHPA encroachment, groundwater vulnerability, and incompatibility with surrounding land uses.
2. **Advise the Township and Province** that the County does not support extraction inside WHPA-C/D due to unacceptable drinking water risks.
3. **State clearly that the proposal conflicts with County planning policies**, source-water protection requirements, and environmental protection mandates.

Rejecting the proposal is the only responsible action given its demonstrated threats to water resources, residential communities, and ecological systems.

Thank you for your consideration. I am available to provide any additional mapping, documentation, or clarification as needed.

Sincerely,

John Tosland



Attention: L. Davies Snyder, D. Mayberry, D. Giles, J. Middleton, C. Brooks, N. Deruyter, M. Cummins, and others

Bardoel Pit ARA Application #626680
2026
Oxford County File #ZN4-25-08
Re. Soniusfield Farms Ltd.
Applicant J-AAR Materials Lt

May 12,

- Reject this application in its current form.
- No gravel pit operation should be considered adjacent to any built up residential area.
At least 12 houses directly border the lands in the proposed gravel pit, and over 30 residences are in close proximity.
- No below water line should be considered and needs to be removed from the application.
Once water table is disturbed, no one knows the effect down the road.
- Refer to Mr. John Tosland's letter of Dec.7, 2025 for several valid reasons to refuse this application.
- The proposed gravel pit would dramatically affect the residential neighbourhood in a negative way and also lower property values.
- Traffic flow of trucks is huge under the proposed route and this is also outlined in my previous letter of Dec. 15, 2025, for options.
- Consider at least deleting Phase 3 of the proposed gravel pit. This is the area that borders most of the residential area.
- Consider the possible adverse effect on the water supply to Ingersoll and the other residences in the area where the majority of the water supply originates and how this could be impacted in the future.

Terry Harrison



Marty Ross



9:02 PM (1
minute ago)

to planning

We are writing to formally submit our opposition to the land use change application- File ZN 4-25-08 (Soniusfield Farms Ltd). After reviewing all the related reports and studies, it is only more evident that the approval of the application would only benefit the applicant at the expense of the surrounding community, including the residents, neighbours, wildlife and the environment. The community is expected to accept at lower standard of living and endure all the negative effects including, but not limited to the increase in excessive heavy truck and traffic noise, machine noise, the inability to go outside of our homes due to the excessive dust and sand from the high winds that could potentially cause damages, potential flooding and lower property values that will occur to the residents that live close to the facility. We understand that an application for land use change doesn't need to offer benefits to the surrounding community, but we do not believe that an application should come at the expense of the community. We hope you consider what is best for the community and not what would be best for only one.

Please notify us of the decisions made by the township in regards to this matter.

Regards, Marty and Melissa Ross