



PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE

November 27, 2025

Meagan Ferris, RPP MCIP
Manager of Planning and Environment
County of Wellington Planning & Development
74 Woolwich Street
Guelph ON N1H 3T9

Justine Brotherston
Director of Corporate Services/Municipal Clerk
Township of Puslinch
7404 Wellington Rd 34, Puslinch ON N0B 2J0

Dear Meagan and Justine:

**RE: CBM Aggregates, a Division of St. Marys Cement Inc. (Canada)
Proposed Safarik Pit
Part of Lot 29, Concession 7, Township of Puslinch, County of Wellington
County of Wellington Official Plan Amendment
Township of Puslinch Zoning By-law Amendment
OUR FILE Y321AR**

CBM Aggregates, a Division of St. Marys Cement Inc. (Canada) ('CBM') is applying for an amendment to the County of Wellington Official Plan and Township of Puslinch Zoning By-law to permit a below water pit on the lands located at Part of Lot 29, Concession 7 in the Township of Puslinch, County of Wellington. The subject lands are municipally addressed as 4275 Concession Road 7.

The subject lands are located approximately 1.4 km south of the CBM McNally Pit (ARA Licence #624864) which is located at the northwest corner of Concession 2 and Concession Road 7 in the Township of Puslinch. The subject lands are owned by CBM. The future Highway 6 by-pass is immediately adjacent to the subject lands.

The area proposed to be licensed is approximately 27.6 hectares (68.2 acres) with 21.3 hectares (52.6 acres) proposed for extraction. The maximum annual tonnage is proposed to be 1 million tonnes. The subject lands contain approximately 5 million tonnes high-quality sand and gravel resources within the proposed extraction area.

An application for a Class A Licence has been submitted to the Ministry of Natural Resources concurrently with these applications.

The subject lands are bisected by a hydro corridor. The area fronting onto Concession 7 is referred to as Area B, and the rear portion is referred to as Area A; in accordance with the proposed sequence of operations. The two areas are connected by a Right of Way Easement over the hydro corridor, as shown on the ARA Site Plans.

Approximately 0.9 hectares of the southwest portion of Area A is identified within the Greenbelt Plan.

The lands are currently used for the production of cash crops and contain a dwelling, detached garage and old barn outside of the proposed extraction area.

The subject lands are located within a larger site that is approximately 32.8 hectares in size. The proposed licensed area has been delineated to avoid significant natural features. The proposed extraction area is setback at least 10 metres from the field verified dripline of the adjacent significant woodlands.

The subject lands will be accessed via a new truck entrance located at the west end of the subject lands. Truck travel will not be permitted to head south from the subject lands on Concession Road 7. The current residential entrance to the subject lands will remain in place for access to the house. Trucks will not be permitted to use this entrance.

Lands that are not located within the proposed extraction area will be used for setbacks from environmental features and for landscaped visual and acoustic berms. The existing vegetation in these setbacks will be maintained, except where berms are required to be constructed. Along Concession Road 7, the setback from the road will be 30 metres. In addition, there will be a 10 m setback from wetlands and significant woodlands.

There will be no aggregate processing on the subject lands. Materials will be extracted via excavators and dragline (for below water extraction), stockpiled within the extraction area and then shipped, via highway trucks, for processing to the McNally Pit (Licence #624864) or other nearby CBM operations. Highway trucks will ship materials from the subject lands along Concession Road 7 to the main processing plant at the McNally Pit.

The processed aggregate from the McNally Pit will then be shipped to market using the existing truck entrance/exit on Concession Road 7, north across Highway 401 to McLean Road and then primarily east to Highway 6. This is the existing truck haul route from the McNally Pit.

The proposed hours of operation for the Safarik Pit are from 7 am to 7 pm Monday to Friday, except statutory holidays. Shipping hours are restricted to 7 am to 6 pm on weekdays and 8 am to 4 pm on Saturdays.

The lands will be extracted to a maximum depth of approximately 295 masl. The removal of aggregate resources from below the water table will result in the creation of two lakes that will be approximately 9.2 ha in total size. Shallow shoreline areas are proposed around the perimeter of the lake.

Approximately 0.1 ha of new wetland will be created to the north of the proposed pit pond in Area A. In addition, approximately 1.0 ha of new forest cover will be created within the 10-metre setback.

Within the area identified in the Greenbelt Plan, approximately 0.6 ha of pollinator habitat will be created. These features will be created progressively as extraction proceeds through the site as outlined on the phasing notes of the ARA Site Plans. The rehabilitated landform will be compatible with the surrounding area.

The Technical Reports prepared for the ARA licence and planning applications include the following:

- Aggregate Resources Act Site Plans, MHBC, November 2025
- Planning Report and ARA Summary Statement, MHBC, November 2025
- Natural Environment Report, WSP Canada, September 2025
- Level 1 and 2 Water Report, WSP Canada, October 2025
- Maximum Predicted Water Table Report, WSP Canada, October 2025
- Stage 1 and 2 Archaeological Assessment, WSP Canada, September 2025
- Noise Assessment Report, WSP Canada, November 2025
- Cultural Heritage Report, WSP Canada, July 2025
- Heritage Impact Assessment, WSP Canada, October 2025
- Traffic Impact Assessment, TYLin, August 2025
- Best Management Practices Plan for the Control of Fugitive Dust, WSP Canada, October 2025

The following application materials are also being provided with the submission of the County Official Plan amendment and Township Zoning By-law amendment applications:

1. County OPA Application Form and Fee (\$62,070)
2. Source Water Protection Screening Form
3. Township ZBA Application Form and Fee (\$80,000)
4. Grand River Conservation Authority Review Fee (\$42,850)
5. Ownership Information (owned by CBM)

The application materials and technical reports can be downloaded from the following link: [☐ CBM Safarik- County of Wellington OPA and Township of Puslinch ZBA Nov 27 2025](#)

Two hard copies of the application materials including technical reports are being couriered to the County. The application material to the Township will be uploaded on the online application portal, Cloudpermit.

The cheque for the County Official Plan Amendment application and Grand River Conservation Authority review fee will be included in the hard copy submission package to the County. The cheque for the Township Zoning By-law Amendment application will be provided to the Township by courier.

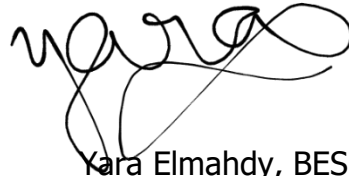
We look forward to working with the Township and County on these applications. We will ensure that the Township and County are made aware of the status of the ARA application including potential timing for consultation.

Yours truly,

MHBC



Neal DeRuyter, BES, MCIP, RPP



Kara Elmahdy, BES

cc. *Courtenay Hoytfox, Township of Puslinch*
Sarah Wilhelm / Jameson Pickard, County of Wellington
Andreanne Simard / Stephen May, CBM Aggregates