MHBC | PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

November 4, 2026

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Planning, Development and Public Works Department
County of Peterborough
470 Water Street
Peterborough, ON K9H 3M3

Dear Jennifer Clinesmith:

RE: Proposed Norwood Pit Extension – Planning Justification Report Addendum
OUR FILE 21100B

This letter is intended to serve as an addendum to the Planning Report & Aggregate Resources Act Summary Statement, prepared by MHBC, dated August 2026, that was filed with Drain Bros. Excavating Limited. proposed Norwood Pit Extension application in the Township of Douro-Dummer, County of Peterborough.

An addendum is required since the new County of Peterborough Official Plan was approved by the Ministry of Municipal Affairs and Housing in August 2026 and is now in force. The Planning Report & Aggregate Resources Act Summary Statement that was filed reviewed the proposed Norwood Pit Extension in relation to the former County of Peterborough Official Plan (1994).

Introduction

On August 21, 2026, Drain Bros. Excavating Limited submitted Official Plan Amendment and Zoning By-law Amendment applications to the County of Peterborough and Township of Douro-Dummer for the proposed Norwood Pit Extension on the lands legally described as Part of Lots 1 and 2, Concession 11 and 12 in the Township of Douro-Dummer, County of Peterborough (the "site").

The Norwood Pit Extension is proposed to operate as an above water pit licenced under the *Aggregate Resources Act* (ARA) with a 36.7-hectare licence area and 28.1 hectares proposed for extraction. The submitted County of Peterborough Official Plan Amendment and Township of Douro-Dummer Zoning By-law Amendments applications sought site-specific amendments to permit the proposed Norwood Pit Extension.

On August 4, 2026, the County of Peterborough's new Official Plan ("County OP") was approved by the Ministry of Municipal Affairs and Housing ("MMAH"). The County OP was initially adopted by the

County of Peterborough (the "County") Council on June 29, 2022, but only came into effect once approved by the MMAH.

Accordingly, since the County OP came into effect prior to the applications being filed, this Planning Justification Report Addendum Letter ("addendum letter") has been prepared to address the policies of the new County OP as it relates to the Norwood Pit Extension. In addition, this addendum letter also incorporates additional policies of the Provincial Planning Statement ("PPS") (2024) related to employment areas based on the new land use designations within the County OP. This addendum letter is to be read in conjunction with the Planning Report & Aggregate Resources Act Summary Statement, prepared by MHBC, dated August 2026, which otherwise remains unchanged other than the policy review related to the PPS employment area policies and the County of Peterborough Official Plan. This addendum letter supersedes the County of Peterborough policy analysis and contained within the Planning Report & Aggregate Resources Act Summary Statement and provides additional analysis related to the PPS.

As a result of the new County OP, an updated Official Plan Amendment has been prepared and is included as **Appendix A** to this letter. It has been confirmed with County Staff the proposed Norwood Pit Extension is a permitted use in the Rural designation and an Official Plan Amendment is not required. In the area of the site designated Employment, a site-specific Official Plan Amendment is required to allow for an extractive industrial use within the Employment designation.

Provincial Planning Statement (2024)

This section of the addendum letter is intended to supplement Section 5.1 in the Planning Report & Aggregate Resources Act Summary Statement. Additional analysis is required since the County OP now designates a portion of the site as "Employment".

Employment

The PPS defines "Employment area" as follows:

> *Means those areas designated in an official plan for clusters of business and economic activities including manufacturing, research and development in connection with manufacturing, warehousing, goods movement, associated retail and office, and ancillary facilities. An employment area also includes areas of land described by subsection 1(1.1) of the Planning Act. Uses that are excluded from employment areas are institutional and commercial, including retail and office not associated with the primary employment use listed above.*

The County OP designates the southern portion of the site as "Employment" (**Figure 1**). As such, the site is partially located within an employment area in the context of the PPS.

Section 2.8 of the PPS contains policies related to Employment, with Section 2.8.2 of the County OP containing policies specific to Employment Areas.

2.8.2.1 Planning authorities shall plan for, protect and preserve employment areas for current and future uses, and ensure that the necessary infrastructure is provided to support current and projected needs.

The southernmost portion of the site is designated for employment uses in the County OP. However, Provincial and County mapping also identify this portion of the site as being part of an aggregate resource area. As such, this area is also protected through the PPS and County Official Plan for future mineral aggregate resource use. Aggregate extraction is an interim land use and the proposed OPA has been structured to maintain the Employment designation and permit the Norwood Pit Extension as a site-specific use.

In addition, the proposed Norwood Pit Extension is an employment use that would provide for employment opportunities on the lands. The balance of the property fronting on Highway 7, which is within the employment area, is not proposed to be licenced under the ARA.

2.8.2.2 Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations.

The portion of the property fronting onto Highway 7 is not proposed to be located within the licenced area for the Norwood Pit Extension. Accordingly, employment land fronting on Highway 7 will be protected for employment area uses which can utilize the Highway 7 corridor.

2.8.2.3 Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:

- *a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
- *b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
- *c) prohibiting retail and office uses that are not associated with the primary employment use;*
- *d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and*
- *e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.*

As noted above, the southernmost portion of the site is designated for employment uses in the County OP. Aggregate extraction is an interim land use and the proposed OPA has been structured to maintain the Employment designation and permit the Norwood Pit Extension as a site-specific use. The employment area is maintained on the broader property along Highway 7 and is located outside of the proposed ARA licence boundary. Aggregate extraction is not a use prohibited under b) through d) in 2.8.2.3.

Currently, the lands within the employment designation are proposed to be rehabilitated to a natural heritage end-use in accordance with the recommendations from the natural environment report. It is noted that the County OP also includes natural heritage areas within the Employment designation as shown on **Figure 1**. If during the review of the application, the agencies prefer that the employment lands be rehabilitated to a landform to facilitate future industrial uses, Drain Bros. is supportive of making this revision to the application.

2.8.2.4 Planning authorities shall assess and update employment areas identified in official plans to ensure that this designation is appropriate to the planned function of employment areas. In planning for employment areas, planning authorities shall maintain land use compatibility between sensitive land uses and employment areas in accordance with policy 3.5 to maintain the long-term operational and economic viability of the planned uses and function of these areas.

2.8.2.5 Planning authorities may remove lands from employment areas only where it has been demonstrated that:

a) there is an identified need for the removal and the land is not required for employment area uses over the long term;
b) the proposed uses would not negatively impact the overall viability of the employment area by:

1. *avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;*
2. *maintaining access to major goods movement facilities and corridors;*

c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and

d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.

The southern portion of the site is designated "Employment" in the County OP. Section 3.5 speaks to land use compatibility. The proposed Norwood Pit Extension is not a sensitive land use and is appropriate to locate within and adjacent to an employment area. The Norwood Pit Extension has been designed to minimize and avoid unacceptable impacts and is compatible with adjacent and surrounding land uses.

The proposed OPA has been structured to maintain the Employment designation and permit the Norwood Pit Extension as a site-specific use. Accordingly, the proposed OPA does not remove lands from an Employment Area.

Stormwater Management

Section 3.6 of the PPS contains policies related to Sewage, Water and Stormwater. Section 3.6.8 states that planning for stormwater management shall:

a) be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;
b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;
c) minimize erosion and changes in water balance including through the use of green infrastructure;
d) mitigate risks to human health, safety, property and the environment;
e) maximize the extent and function of vegetative and pervious surfaces;
f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and
g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.

A Level 1 and 2 Hydrogeological Assessment was prepared by Tatham Engineering which serves to address, in part, the stormwater management report requirement in the complete application requirements. This is a typical approach for aggregate applications when a stormwater management report has been requested since stormwater considerations are not as significant when dealing with aggregate operations.

The Norwood Pit Extension will effectively function to retain and infiltrate all stormwater on-site and there will be no off-site discharge. On this basis, the proposed extension does not increase stormwater volumes off-site and pervious surfaces will be maintained on the site. There will be no off-site discharge of surface water or stormwater as a result of the proposed Norwood Pit Extension. Therefore, there are no anticipated impacts on municipal drainage features.

County of Peterborough Official Plan

This section of the addendum letter is to replace Section 5.2 in the Planning Report & Aggregate Resources Act Summary Statement which provided an overview of the former County OP (1994) policies.

The County OP provides guidance for growth and development within the County. The eight lower-tier municipalities located within the County, including the Township of Douro-Dummer, have their local policies in the County OP.

The Township of Douro-Dummer Land Use Schedule ("DD-8"), which forms a part of the County OP, designates the northern portion of the site "Rural" and the southern portion "Employment" (**Figure 1**). In addition, portions of the site are identified as being within the County's "Aggregate Resource Area" overlay. The site appears to be located outside of the "Natural Core Area" and "Natural Core

Area – Provincially Significant Wetland" (**Figure 1**). The entirety of the site is identified as being within a "Regional ANSI" on the County OP's Douro-Dummer Environmental Schedule (**Figure 2**).

Section 4.1.3 of the County OP sets out polices related to the "Rural" designation. The County OP states that the Rural land use designation generally applies to lands located outside settlement areas and rural settlements, waterfront areas and prime agricultural areas. The rural designation is intended to protect the natural amenities and rural character of the community while providing opportunities for agricultural uses, resource-based activities, recreation, tourism and other rural land uses.

Section 4.1.3.1 identifies that mineral aggregate operations are a permitted use in the Rural designation. Accordingly, a County Official Plan Amendment is not required to permit the proposed aggregate use within the Rural designation on the site.

As it related to the proposed Norwood Pit Extension, Section 4.1.3.2 i) of the Rural designation policies specifically states:

> *For the purposes of this Plan, mineral aggregate operations are considered an interim land use. The establishment of new mineral aggregate operations in the Rural designation may be supported by an Agricultural Impact Assessment. Where a Zoning By-Law Amendment is necessary to permit such use, the criteria outlined in Section 4.1.8 and Section 8 of this Plan should be considered, as applicable. Final rehabilitation of the site will seek to maintain or improve connectivity of the agricultural system, if feasible.*

The proposed Norwood Pit Extension is a permitted use and is recognized as an interim use on the northern portion of the site designated "Rural". An Agricultural Impact Analysis was determined to not be required to support the application. An amendment to the Township of Douro-Dummer Zoning By-law Amendment is required to permit the proposed Norwood Pit Extension. This planning addendum includes a review of the criteria outlined in Section 4.1.8 (Extractive Industrial) and Section 8 (Minerals, Petroleum and Mineral Aggregate Resources) of the County OP, including details regarding rehabilitation.

As noted, the southern portion of the site is designated "Employment" (**Figure 1**). As set out in Section 4.1.5, the intent of the Employment designation is to provide opportunities for employment uses and the movement of goods and services to the rural community, are space intensive uses requiring limited water or sanitary services, or necessitate close proximity to major transportation routes, including Highway 115, Highway 28, Highway 7 and the Peterborough Airport.

Mineral aggregate operations are not explicitly identified as a permitted use in the Employment designation under section 4.1.5.1. Accordingly, an Official Plan Amendment is required to permit the proposed Norwood Pit Extension within the "Employment" designation on site.

If during the review of the application, the agencies prefer that the employment lands be rehabilitated to a landform to facilitate future industrial uses, Drain Bros. is supportive of making this revision to the application.

Section 4.1.8 of the County OP contains policies related to the "Extractive Industrial" designation. The following are policies from Section 4.1.8.2 which pertain to new development:

a) *All aggregate and mining operations must be licenced by the Province and must meet the requirements of the Aggregate Resources Act or the Mining Act, as applicable.*

An ARA licence application has been filed with the Ministry of Natural Resources (MNR) to permit the proposed Norwood Pit Extension. The ARA site plans have been designed in accordance with the requirements under the ARA.

b) *Where an Official Plan Amendment or Zoning By-Law Amendment is necessary to permit the establishment of a new or expanded mineral aggregate or mineral mining operation, the following criteria shall be considered in addition to the policies of Section 3.6:*

Section 4.1.8.2 b) Policy	**Proposed Norwood Pit Extension**
i) *All operations should be screened from public view to the extent possible, in order to protect the scenic characteristics of the area.*	The site is located within a cluster of existing aggregate operations, and the proposed extraction area only abuts a municipal road in one small area of the site. Setbacks and berms are provided, and vegetation is being maintained in areas abutting the site which will assist with screening the proposed operation.
ii) *Regard shall be given to compatibility with existing adjacent land uses that might be affected by a pit, quarry or mining operation. This may be reflected through measures such as extraction setbacks and/or other mitigative techniques such as the use of vegetation or berms to provide screening, restrictions on the location of machinery, the timing of extraction operations, and the location and condition of haul routes. Any mitigative techniques being established should depend on a site-by-site review, having regard to the policies of this Plan. These requirements may be implemented through:* o *conditions on the licence and/or site plan under the Aggregate Resources Act or Mining Act at the time of licensing by the Province;*	The proposed Norwood Pit Extension has been designed in accordance with provincial standards to ensure extraction is undertaken in a manner which minimizes impacts on adjacent and surrounding land uses. Mineral aggregate operations are required to be designed to minimize impacts on surrounding sensitive land uses and the proposed Norwood Pit Extension has been designed, buffered and/or separated from sensitive land uses to prevent adverse effects form noise and other potential contaminants in accordance with provincial guidelines and standards. Section 4.3 of the Planning Report & Aggregate Resources Act Summary Statement details on the mitigation measures that will be implemented to minimize impacts on surrounding land uses. The proposed ARA Site Plans include technical recommendations to ensure potential impacts

Section 4.1.8.2 b) Policy	Proposed Norwood Pit Extension
○ *regulations in a site-specific Zoning By-Law for the property; and* ○ *provisions in a development agreement under Section 8.2 of this Plan.*	are mitigated and minimized in accordance with Provincial guidelines and standards.
iii) A mineral aggregate operation for a pit proposed within 300 metres of a sensitive land use and a mineral aggregate operation for a quarry proposed within 500 metres of a sensitive land use must assess potential impacts on these uses and demonstrate how such impacts can be mitigated and minimized in accordance with Provincial guidelines and standards.	
iv) All mineral aggregate and mineral mining operations must satisfy the requirements of the authority having jurisdiction as to water supply and groundwater pumping, and waste water disposal.	A Level 1 and 2 Hydrogeological Assessment was prepared in accordance with the requirements under the ARA. The Assessment concluded that the proposed Norwood Pit Extension will protect the quality and quantity of water. A monitoring plan has been developed to ensure the hydrologic functions of sensitive surface water features and sensitive groundwater features are protected.
v) All mineral aggregate and mineral mining operations must satisfy the requirements of the Province and/or By-laws of the local Municipality as to the control of dust, noise and vibration.	An ARA licence application has been filed with the MNR to permit the proposed Norwood Pit Extension. The application and ARA site plans have been designed in accordance with Provincial requirements. Mineral aggregate operations are required to be designed to minimize impacts on surrounding sensitive land uses and the proposed Norwood Pit Extension has been designed, buffered and/or separated from sensitive land uses to prevent adverse effects form noise and other potential contaminants.

Section 4.1.8.2 b) Policy	Proposed Norwood Pit Extension
vi) Within the Natural Heritage System as shown on the Natural Heritage System Schedule attached to this Plan, new mineral aggregate operations and new wayside pits and quarries shall not be permitted: ○ *in significant wetlands;* ○ *in significant habitat of endangered species and threatened species except in accordance with provincial and federal requirements;*	A Natural Environment Report was prepared for the proposed Norwood Pit Extension which confirmed on-site and adjacent natural heritage features. There are no significant wetlands on the site. The proposed extraction area does contain significant wildlife habitat and significant woodlands. Extraction within these features will occur in accordance with provincial and local requirements to ensure no negative impacts to these features as confirmed in the Natural Environment Report.
vii) Expansions to existing mineral aggregate operations may be permitted in the Natural Heritage System, if the related decision is consistent with the Provincial Planning Statement and satisfies the rehabilitation requirements of this Plan, and applicable Provincial plans.	It is understood that the County Natural Heritage System mapping and policies are subject to a non-decision and are not in effect. The proposed Norwood Pit Extension is an expansion to an exiting mineral aggregate operation It is the opinion of the undersigned that the application is consistent with the PPS and satisfies the rehabilitation requirements of the PPS and the County OP.
viii) Where a new or expanding mineral aggregate operation expands into a prime agricultural area, the application will be supported by an Agricultural Impact Assessment and, where possible, will seek to maintain or improve connectivity of the agricultural system.	The site is located outside of the prime agricultural area.
ix) Haul routes and the traffic generated by the proposed operation shall be considered through the preparation of a traffic impact study. A Traffic Impact Study will be prepared by a qualified professional and must be done to the satisfaction of the local Municipality and the road authority having jurisdiction. The Traffic Impact Study shall address, but shall not necessarily be limited to, the projected volume of truck traffic related to the proposed mineral aggregate	A Traffic Impact Brief was completed by Paradigm Transportation Solutions Limited for the proposed Norwood Pit Extension. The proposed Norwood Pit Extension will utilize the existing Norwood Pit entrance/exit onto Dummer Eleventh Line Road and the existing approved haul route, and will have a combined tonnage with the existing Norwood East Pit. The Traffic Impact Brief concluded that the proposed pit is forecast to have a negligible impact on traffic operation and site-generated

Section 4.1.8.2 b) Policy	Proposed Norwood Pit Extension
operation and existing mineral aggregate operations (whether active or not) using the same haul routes, the physical suitability of the haul routes for truck traffic, the nature and volume of existing traffic on the haul routes, requirements for improvements to the haul routes, the location and design of a safe site entrance, and community impacts and safety.	traffic is expected to remain identical to the current levels. No off-site modifications to the road network are required to support the proposed Norwood Pit Extension.
x) Progressive and final rehabilitation of mineral aggregate operations shall meet the requirements of Section 8.3.	An analysis of Section 8.3 has been included in this addendum letter below.
xi) A proposed mineral aggregate operation within the 500 metre waste management assessment area of an active or former waste disposal site shall address the applicable policies of Section 4.1.12 of this Plan.	The proposed Norwood Pit Extension is not located within the 500 metre waste management assessment area of an active or former waste disposal site.
xii) The application shall be accompanied by detailed site development plans and reports as listed below or as required by other sections of this Plan. Site plans required by the Aggregate Resources Act are acceptable for the purposes of this policy. *The following Site Plans and reports shall be required, where determined appropriate by the County and/or local Municipality, in consultation with the appropriate agency and in consideration of factors specific to the application, site or subject property, and surrounding lands:* o *Site Plans showing existing features and land uses on and within 120 metres of the site, operations and phasing, progressive rehabilitation, final rehabilitation, and cross-sections of the operation;* o *a hydrogeological report to address the potential for adverse*	The following technical studies were completed as part of the proposed Norwood Pit Extension application: • Maximum Groundwater Level Report • Natural Environment Report • Cultural Heritage Screening Report • Stage 1 and 2 Archaeological Assessment • Level 1 and 2 Hydrogeological Assessment • Noise Impact Assessment • Traffic Impact Brief In addition, site plans under the ARA have been prepared as part of this application. The site plans provide details of existing features, the operational plan, progressive and final rehabilitation, and cross-sections of existing conditions and final rehabilitation of the site. The ARA site plans incorporate all of the recommendations from the various technical reports.

Section 4.1.8.2 b) Policy	Proposed Norwood Pit Extension
effects of the mineral aggregate operation on groundwater and surface water resources and their uses; ○ *an Environmental Impact Study;* ○ *a traffic impact study;* ○ *a noise (acoustical) impact study;* ○ *a dust control study;* ○ *a blasting impact study (as necessary for the type of operation);* ○ *a cultural heritage and archaeological assessment as required by the appropriate authority having jurisdiction; and* ○ *any other reports or studies as deemed necessary by the County, local Municipality or any agency having jurisdiction.* *All site plans and technical reports required by this Plan shall be prepared by qualified professionals, and shall address applicable policies or procedures, including any applicable Provincial Plan under the Planning Act and the provisions of the "Aggregate Resources of Ontario – Provincial Standards" document of the Province of Ontario.*	

Section 8 of the County OP contains policies related to Minerals, Petroleum and Mineral Aggregate Resources. The objectives within Section 8.1 identify that this section of the County OP is intended to:

- To protect known deposits of minerals, petroleum and mineral aggregate resources and significant areas of mineral potential, including existing pits and quarries, for future extraction.

- To identify lands within the County which are licensed for resource extraction and have potential for resource extraction.

- To prevent any development and activities that could conflict with mineral mining operations, petroleum resource operations and mineral aggregate operations or hinder the future extraction of these resources or which would be incompatible for reasons of public health, public safety or environmental impact.

- To ensure extraction is undertaken in a manner which minimizes social, economic and environmental impacts.

The Township of Douro-Dummer Land Use Plan identifies portions of the site within the "Aggregate Resource Area" overlay (**Figure 1**). In addition, the site forms part of the Norwood esker and is identified as a "selected sand and gravel resource area of primary significance" in the Province's Aggregate Resources Inventory Papers (ARIP #105). Accordingly, this area has a planned function for future mineral aggregate resource use. The proposed application will enable a known aggregate resource to be protected for the long-term and made available to support growth and development in surrounding markets.

The application has been designed to ensure extraction is undertaken in a manner which minimizes social economic and environmental impacts. See Section 4.3 of the Planning Report & Aggregate Resources Act Summary Statement for details on the mitigation measures that will be implemented to minimize impacts on surrounding land uses.

The following are excerpts from Section 8 which pertain to Mineral Aggregate Resource policies appliable to the proposed Norwood Pit Extension.

Section 8.2 addresses Development Agreements. Section 8.2 8) states the following:

> 8.2 8) *The local Municipality may not require a provision in a Development Agreement when it is satisfied that the same matter will be addressed in the provincial licensing process under the Aggregate Resources Act.*

Prior to approval of the application, discussions will occur between the Township and Drain Bros. to determine if a development agreement is required or if all of the matters have been addressed in accordance with the provincial licencing process under the ARA.

Section 8.3 of the County OP contains policies related to the rehabilitation of mineral aggregate operations.

Section 8.3	Proposed Norwood Pit Extension
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.	The application has been designed to ensure progressive and final rehabilitation will be undertaken in a manner that promotes land use compatibility, to recognize the interim nature of extraction, and to mitigate negative impacts to the extent possible. Final rehabilitation of the site was designed to incorporate natural features that replace and integrate with existing surrounding rural and natural feature land uses.
2) Comprehensive rehabilitation planning is encouraged where there is a concentration of mineral aggregate operations.	The proposed Norwood Pit Extension will match the grades of the existing Norwood East Pit to the west and the rehabilitation plan has been

Section 8.3	Proposed Norwood Pit Extension
	designed to complement the surrounding land uses.
3) In prime agricultural areas, on prime agricultural land, mineral aggregate operations will be rehabilitated back to an agricultural condition. However, complete rehabilitation to an agricultural condition is not required if: i. there is a substantial quantity of mineral aggregate resources below the water table warranting extraction, or the depth of planned extraction in a quarry makes restoration of pre-extraction agricultural capability unfeasible; ii. other alternatives have been considered by the applicant and found unsuitable. The consideration of other alternatives shall include resources in areas of Canada Land Inventory Class 4 through 7 lands, resources on lands identified as designated growth areas, and resources on prime agricultural lands where rehabilitation is feasible. Where no other alternatives are found, prime agricultural lands shall be protected in this order of priority: specialty crop areas, Canada Land Inventory Class 1, 2 and 3 lands; and iii. agricultural rehabilitation in remaining areas is maximized.	The Norwood Pit Extension is not located in a prime agricultural area, on prime agricultural land.
4) For rehabilitation of new mineral aggregate operation sites, the following apply: xiii) the disturbed area of a site will be rehabilitated to a state of equal or greater ecological value and, for the entire site, long-term ecological integrity will be maintained or enhanced; xiv) if there are key natural heritage features or key hydrologic features on the site, or if	The rehabilitation plan has been designed to ensure the site is rehabilitated to an end use that is compatible with the surrounding natural heritage features and land uses. Overall, final rehabilitation for the Norwood East Pit is proposed to result in the creation of self-sustaining woodland and grassland areas. Restoration plantings and areas in the rehabilitation plan will ensure long-term connectivity of the natural heritage system and habitat availability to species identified through the ecological fieldwork.

Section 8.3	Proposed Norwood Pit Extension
such features existed on the site at the time of the application: • the health, diversity, and size of these key natural heritage features and key hydrologic features will be maintained or enhanced; and • any permitted extraction of mineral aggregate resources that occurs in a feature will be completed, and the area will be rehabilitated, as early as possible in the life of the operation; • aquatic areas remaining after extraction are to be rehabilitated to aquatic enhancement, which will be representative of the natural ecosystem in that particular setting or ecodistrict, and the combined terrestrial and aquatic rehabilitation will maintain or enhance the health, diversity, and size of these key natural heritage features and key hydrologic features; and • outside the Natural Heritage System as shown on Schedules to this Plan, and except as provided for above, final rehabilitation will appropriately reflect the long-term land use of the general area, taking into account applicable policies of this Plan and, to the extent permitted under this Plan, existing municipal and provincial policies.	Rehabilitation of the proposed pit includes pre-emptive plantings adjacent to wetlands, and the overall creation of 14.9 hectares of woodland, 19.3 hectares of grassland, and 1.1 hectares of cultural meadow for potential monarch habitat. Rehabilitation will be progressive throughout the life of the operation and will commence with pre-emptive plantings adjacent to wetlands, which will be planted within 5 years of issuance of the licence. The proposed final rehabilitation plan includes the importation of 2,660,000 m^3 of excess soils to restore the lands to existing grades to minimize changes across the existing and final landforms. Rehabilitation of this site will not be impacted by other operations, nor will it impact the rehabilitation of other operations. If during the review of the application, the agencies prefer that the employment lands be rehabilitated to a landform to facilitate future industrial uses, Drain Bros. is supportive of making this revision to the application.
5) Final rehabilitation for new mineral aggregate operations in the Natural Heritage System as shown on Schedules to this Plan will meet these additional criteria: i. where there is no extraction below the water table, an amount of land equal to that under natural vegetated cover prior to extraction, and no less than 35 per cent of the land subject to each license in the Natural Heritage System, is to be rehabilitated to forest cover, which will be representative of	It is understood that the County Natural Heritage System mapping and policies are subject to a non-decision and are not in effect. Therefore, this policy is not applicable.

Section 8.3	Proposed Norwood Pit Extension
the natural ecosystem in that particular setting or ecodistrict. If the site is also in a prime agricultural area, the remainder of the land subject to the license is to be rehabilitated back to an agricultural condition; ii. where there is extraction below the water table, no less than 35 per cent of the non-aquatic portion of the land subject to each license in the Natural Heritage System is to be rehabilitated to forest cover, which will be representative of the natural ecosystem in that particular setting or ecodistrict. If the site is also in a prime agricultural area, the remainder of the land subject to the license is to be rehabilitated back to an agricultural condition; and iii. rehabilitation will be implemented so that the connectivity of the key natural heritage features and the key hydrologic features on the site and on adjacent lands will be maintained or enhanced.	

Section 3.6 of the County OP provides criteria in considering Official Plan Amendments:

Section 3.6 Criteria	Proposed Norwood Pit Extension
1) The need for the proposed change, use or development, having regard to lands elsewhere in the Municipality already designated for the proposed use. However, demonstration of need for mineral aggregate resources, including any type of supply/demand analysis, shall not be required, notwithstanding the availability, designation or licensing for extraction of mineral aggregate resources locally or elsewhere.	The Official Plan Amendment for the proposed Norwood Pit Extension seeks to permit mineral aggregate operations as a site-specific use in the Employment designation. The demonstration of need for mineral aggregate resources is not required as noted in this policy and policy 4.5.2.1 of the PPS.

Section 3.6 Criteria	Proposed Norwood Pit Extension
2) The impact on the natural environment having regard for key natural heritage features and key hydrologic features, as required by Section 6 and Section 9 of this Plan.	A Natural Environment Report was prepared by RiverStone Environmental Solutions Inc. for the proposed Norwood Pit Extension which confirmed that key natural heritage features and key hydrologic features will be protected for the long term. Section 6 and Section 9 of the County OP have been evaluated in this addendum letter.
3) The adequacy of the potable water supply, sewage disposal facilities, stormwater management and other municipal services.	Municipal services are not required as part of this application.
4) The adequacy of the existing and proposed roads system in relation to the proposed development, as well as the convenience and accessibility of the site for vehicular and pedestrian traffic and traffic safety in relation thereto.	The proposed Norwood Pit Extension will utilize the existing entrance/exit and approved haul route for the Norwood Pit onto Dummer 11th. The proposed Norwood Pit Extension will have a combined tonnage limit with the existing Norwood East Pit. The Traffic Impact Brief completed by Paradigm Transportation Solutions Limited concluded that the proposed pit is forecast to have a negligible impact on traffic operation and site-generated traffic is expected to remain identical to the current levels. No off-site modifications to the road network are required to support the proposed Norwood Pit Extension.
5) The compatibility of the proposed use with existing and planned uses on adjacent lands and surrounding land uses.	The proposed Norwood Pit Extension has been designed in accordance with provincial standards to ensure extraction is undertaken in a manner which minimizes impacts on adjacent and surrounding land uses. The recommendations of the technical reports have informed the design of the operational and rehabilitation plans for the proposed Norwood Pit Extension and have been reflected on the ARA site plans. Mineral aggregate operations are an appropriate rural use, and the Official Plan protects this site and surrounding area for potential aggregate extraction.
6) The potential effect of the proposed use on the financial position of the Municipality.	The proposed Norwood Pit Extension does not require municipal servicing. If approved, the use will result in increased taxes paid to the Township and the Township will receive a levy for every tonne of aggregate that is shipped from the site in accordance with the ARA.

Section 3.6 Criteria	Proposed Norwood Pit Extension
7) Consideration shall be had for the soil capability for agriculture and the potential impacts on surrounding agricultural uses and operations. Where deemed necessary, the local Municipality and/or the County may require an Agricultural Impact Assessment to be completed to assess potential impacts from development on agriculture and recommend measures to avoid and mitigate impacts on the agricultural system. An Agricultural Impact Assessment will be completed by a qualified professional and is to be done in accordance with Provincial guidelines. *Removing land from the Agriculture designation is only permitted for expansions of existing settlement areas or identification of new settlement areas.*	Section 4.1.2 of the PJR notes that the area surrounding the site is generally comprised of Class 4 soils, as identified in the Canada Land Inventory soils mapping. Class 1 to 3 soils are considered prime agricultural land. Accordingly, the site and immediate area are not considered prime agricultural land. The site is not located within a prime agricultural area in the County and the lands surrounding the site are not located within the prime agricultural area as mapped in the County OP.
8) Official Plan Amendments will be required to meet the Minimum Distance Separation requirements as outlined in Section 3.8. *However, Amendments to redesignate land already designated for a non-agricultural use, shall only need to meet the (MDS I) setbacks if the amendment will permit a more sensitive land use than existed before.*	Minimum Distance Separation requirements are not applicable to mineral aggregate operations.
9) Demonstration of how the proposal conforms to any applicable Provincial Plans and the Provincial Planning Statement.	This addendum letter and Section 5.1 of the Planning Report and Aggregate Resources Act Summary Statement evaluate the proposed Norwood Pit Extension in relation to the PPS. The proposed Norwood Pit Extension conforms with the PPS.
10) Official Plan Amendment applications within identified Source Protection vulnerable areas as shown on Appendix E shall be accompanied by a Notice under Section 59(2) of the Clean Water Act, as amended, and must conform to	The site is located within the Otonabee-Peterborough Source Protection Area. Portions of the site are within an Intake Protection Zone (IPZ) 3 for the Hasting Municipal Surface Water System and the majority of the site falls within a Wellhead Protection Area (WHPA), with the western and

Section 3.6 Criteria	Proposed Norwood Pit Extension
the policies of Section 9.5 where applicable.	central portion of the site being within a WHPA-B and WHPA-C, with other portions being within a WHPA-D. The proposed Norwood Pit Extension will operate above the water table and the Level 1 and 2 Hydrogeological Assessment prepared by Tatham Engineering concluded that the operation would result in no adverse effects to the groundwater and surface water resources and their users are anticipated as a result of the operation and rehabilitation of the proposed Norwood Pit Extension. The recommendations of the Level 1 and 2 Hydrogeological Assessment have been included on the ARA site plans to ensure protection of water resources. A Notice under Section 59(2) of the *Clean Water Act* has been provided for the application. A review of Section 9.5 of the County OP is included below.

Section 4.3.1 of the County OP provides policy direction related to the "Natural Core Area" overlay. The Natural Core Area is intended to recognize provincially significant wetlands, locally significant wetlands, non-evaluated wetlands, streams and a 30 metre vegetative buffer surrounding these features. As previously noted, the proposed Norwood Pit Extension is located outside of and adjacent to the County's Natural Core Area (**Figure 1**). There are adjacent wetlands mapped in the County OP (**Figure 2**).

Furthermore, Section 4.3.1.2 i) of the County OP states the following:

> *i) Where it has been determined through consultation with the appropriate approval authority through the delineation of wetland boundaries by a qualified professional that no wetlands or other environmental features are present on site, the abutting land use designation shall apply without need for an Official Plan Amendment. For island properties, the Waterfront residential designation may apply as appropriate.*

A Natural Environment Report was prepared by RiverStone Environmental Solutions Inc. as part of the application. As part of the Natural Environment Report, the boundaries of adjacent wetlands were delineated. As shown on Figure 4a of the Planning Report & Aggregate Resources Act Summary Statement, there are no wetlands within the proposed licence boundary and extraction is proposed to be setback a minimum of 30 metres from the wetland edge.

Natural Heritage Features

Section 6 of the County OP contains policies related to Natural Heritage Features and Natural Hazards which seek to protect and enhance the natural heritage systems found across the County. Within the County, natural heritage features include significant wetlands, fish habitat, significant woodlands, habitat for endangered and threatened species, significant wildlife habitat, significant Valleylands and significant areas of natural and scientific interest.

A Natural Environment Report was prepared by RiverStone Environmental Solutions Inc. for the proposed Norwood Pit Extension which identified the following on-site and adjacent key natural heritage features:

- Within 120 metres of the site there is habitat of endangered and threatened species, non-provincially significant wetlands, significant woodlands, fish habitat and significant wildlife habitat;

- Within the licence boundary there is habitat of endangered and threatened species, significant woodlands and significant wildlife habitat; and,

- Within the extraction limit there is habitat of endangered and threatened species, significant woodlands and significant wildlife habitat.

In accordance with the policies of Section 6.3, development is generally not permitted within or within 120 metres of key natural heritage features unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. The key natural heritage features within the proposed Norwood Pit Extension extraction limit are permitted to be removed in accordance with Provincial and County planning policies subject to meeting certain criteria.

To mitigate for the removal of the on-site key natural heritage features and impacts to adjacent features, the operation has been designed to maintain the existing surrounding natural features outside of the proposed extraction limit and mitigate for the removal or features within the proposed extraction limit to ensure no negative impact. Proposed operational measures include pre-emptive plantings adjacent to wetlands and the creation of potential habitat for monarch butterfly as part of the operational and rehabilitation plans.

In the long-term, the rehabilitation plan for the Norwood Pit Extension is proposed to result in the creation of self-sustaining woodland and grassland areas. Restoration plantings and areas in the rehabilitation plan will ensure long-term connectivity of the natural heritage system and habitat availability to species identified through the ecological fieldwork.

The Natural Environment Report has recommended mitigation measures to ensure that there will be no negative impacts on the adjacent natural heritage features or their ecological function as a result of the proposed Norwood Pit Extension. The recommendations have been included on the ARA site plans.

Water Resources

Section 9 of the County OP contains policies pertaining to water resources. Of note to the application, Section 9.5 contains Source Water Protection policies. The site is located within the Otonabee-Peterborough Source Protection Area, within the Ouse River watershed.

The proposed Norwood Pit Extension is identified to be:

- Located within the Otonabee-Peterborough Source Protection Area. Portions of the site are within an Intake Protection Zone (IPZ) 3 for the Hasting Municipal Surface Water System; amd

- Within a Wellhead Protection Area (WHPA), with the western and central portion of the site being within a WHPA-B and WHPA-C, with other portions being within a WHPA-D.

Section 9.6 of the County OP contains policies related to Highly Vulnerable Aquifers and Groundwater Recharge Areas. The site is mapped within a significant groundwater recharge area (SGRA) and highly vulnerable aquifer (HVA).

A Level 1 and 2 Hydrogeological Assessment was completed by Tatham Engineering to assess potential impacts of the proposed Norwood Pit Extension groundwater and surface water resources, as well as review Source Water Protection considerations.

Overall, the proposed Norwood Pit Extension will remain above the established groundwater table, and no dewatering activities will be carried out. As a result, the proposed Norwood Pit Extension will not impact groundwater resources and the aquifer. In addition, the Province has identified 22 prescribed drinking water threats under the Clean Water Act and aggregate extraction is not one of the prescribed threats.

A groundwater monitoring program will be implemented as part of operations to ensure that the proposed Norwood Pit Extension is not impacting water resources.

Stormwater Management

The stormwater policies of the County OP are outlined in Section 10.3.1. The following excerpts from the County OP can be considered as relating to the proposed Norwood Pit Extension:

1) *Applications for large-scale development shall be supported by a Stormwater Management (SWM) report unless waived by the appropriate agencies through a pre-consultation process in accordance with Section 3.1 of this Plan. The content and scope of the SWM report shall be determined when the development is proposed.*

   Where it has been determined that a stormwater management plan is required, such plan:

   - *will be informed by a subwatershed plan or equivalent, where applicable;*

- *will incorporate an integrated treatment approach to reduce stormwater flows and reliance on stormwater ponds, and minimize change in water balance including appropriate low impact development and green infrastructure;*

- *shall establish planning, design and construction practices to minimize vegetation removal, grading and soil compaction, sediment erosion and impervious surfaces; and*

- *will align with any applicable stormwater master plan or equivalent for the settlement area.*

The SWM Report shall be prepared by a qualified professional to the satisfaction of the local Municipalities, Conservation Authorities and other appropriate agencies and be prepared in accordance with Provincial guidelines.

2) *In considering an application for development or site alteration, the local Municipality shall seek to reduce areas with impervious surfaces and increase areas retained in a natural undisturbed state, in order to minimize stormwater volumes and contaminant loads and increase capacity to adapt to climate change.*

3) *For development proposals located within a vulnerable area, and which require the construction of roads, other impervious land surfaces used for vehicular traffic and parking, and including impervious pedestrian paths, consideration shall be given to design strategies and alternative surfacing which minimizes the amount of impervious surface area. Parking area design that minimizes the amount of impervious surface area to which road salt may be applied is encouraged.*

4) *Grading, maintenance activities and drainage designs that reduce ponding and direct any run-off outside of vulnerable areas, where possible, are encouraged.*

A Level 1 and 2 Hydrogeological Assessment was prepared by Tatham Engineering which serves to address, in part, the stormwater management report requirement in the complete application requirements. This is a typical approach for aggregate applications when a stormwater management report has been requested since stormwater considerations are not as significant when dealing with aggregate operations.

The Norwood Pit Extension will effectively function to retain and infiltrate all stormwater on-site and there will be no off-site discharge. On this basis, the proposed extension does not increase stormwater volumes off-site and pervious surfaces will be maintained on the site. There will be no off-site discharge of surface water or stormwater as a result of the proposed Norwood Pit Extension. Therefore, there are no anticipated impacts on municipal drainage features.

Conclusion

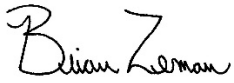
For the reasons summarized in this addendum letter, the proposed Norwood Quarry Extension application represents good planning and:

- Is consistent with the Provincial Planning Statement; and
- Conforms to the County of Peterborough Official Plan.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

MHBC





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cc. *Josiah Latone, Drain Bros. Excavating Limited*
Mark Geens, Drain Bros. Excavating Limited
Emily Fitzgerald, Township of Douro-Dummer
Véronique Falardeau, MNR

Figures

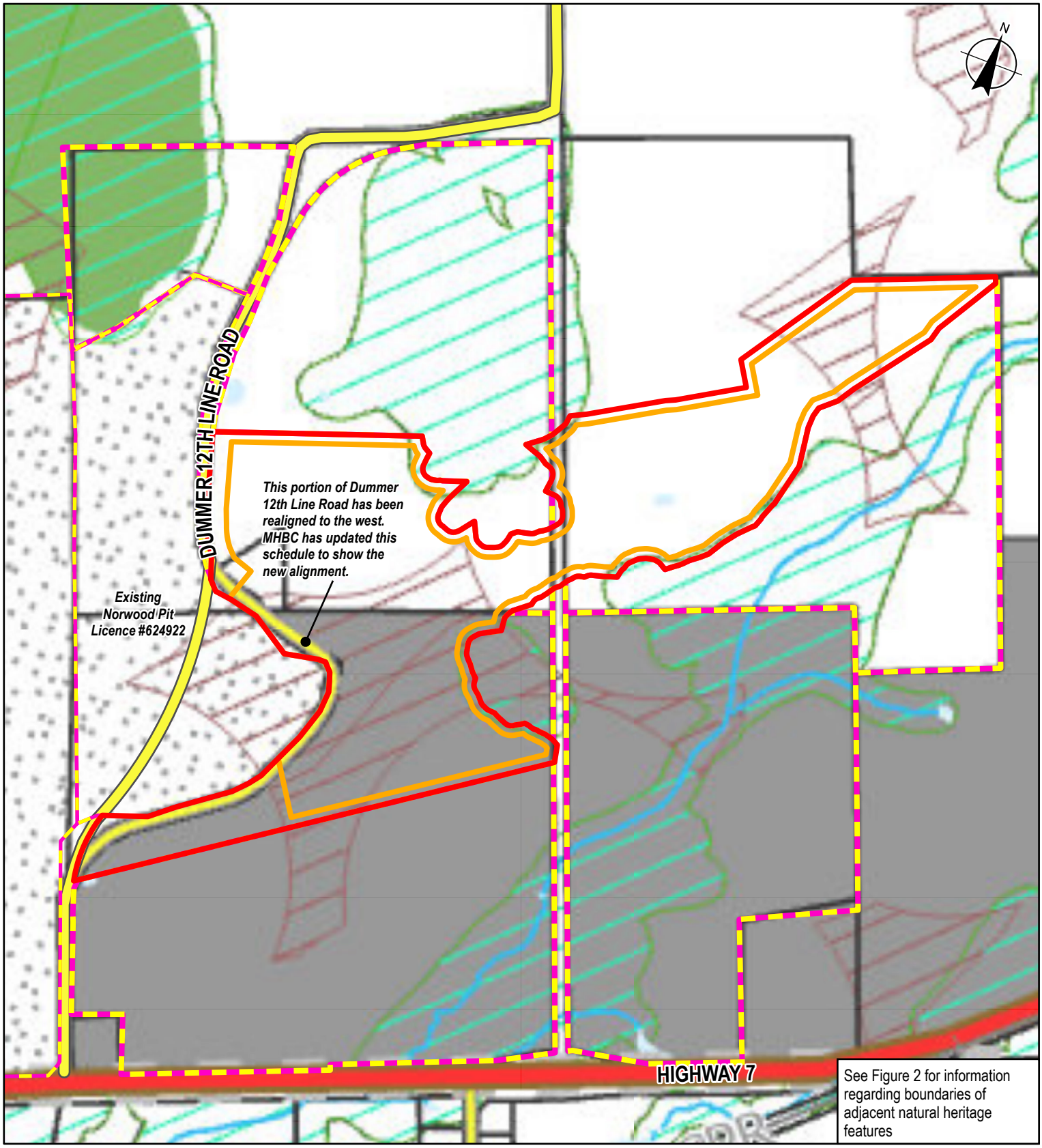

FIGURE #1

Land Use

Township of Douro-Dummer - Map DD-8

Addendum Report

Norwood Pit Extension

Part Lot 1 & 2, Con. 11
Part Lot 2, Con. 12
Geographic Township of Dummer
Township of Douro-Dummer
County of Peterborough

LEGEND

- Proposed Norwood Pit Extension Licence Boundary
- Proposed Norwood Pit Extension Limit of Extraction
- Additional Lands Owned by Applicant

Land Use Designation

- Employment
- Extractive Industrial
- Rural

Overlays

- Aggregate Resource Area
- Natural Core Area
- Natural Core Area
  Provincially Significant Wetland
- Watercourse
- Provincial Highways
- Township Roads

DATE
September, 2026

SOURCES
Township of Douro-Dummer
Official Plan - Map DD-8 'Land Use Schedule'

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MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

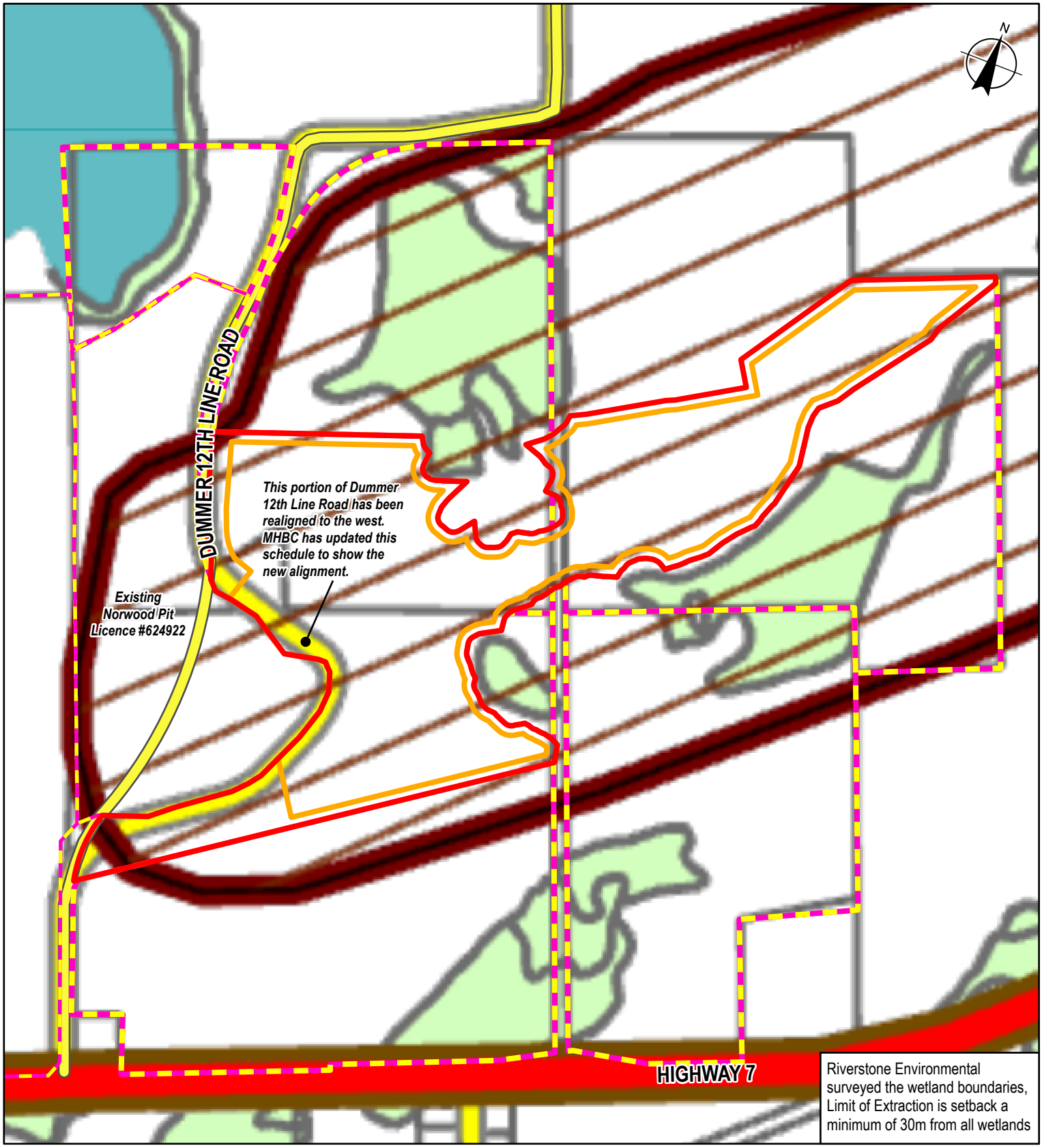

FIGURE #2

Environmental Schedule

Township of Douro-Dummer

Addendum Report

Norwood Pit Extension

Part Lot 1 & 2, Con. 11
Part Lot 2, Con. 12
Geographic Township of Dummer
Township of Douro-Dummer
County of Peterborough

LEGEND

- Proposed Norwood Pit Extension Licence Boundary
- Proposed Norwood Pit Extension Limit of Extraction
- Additional Lands Owned by Applicant
- Regional ANSI
- Non-Evaluated Wetland subject to verification
- Provincially Significant Wetland
- Provincial Highways
- Township Roads

DATE: September, 2026

SOURCES

Township of Douro-Dummer
Official Plan - Environmental Schedule

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MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

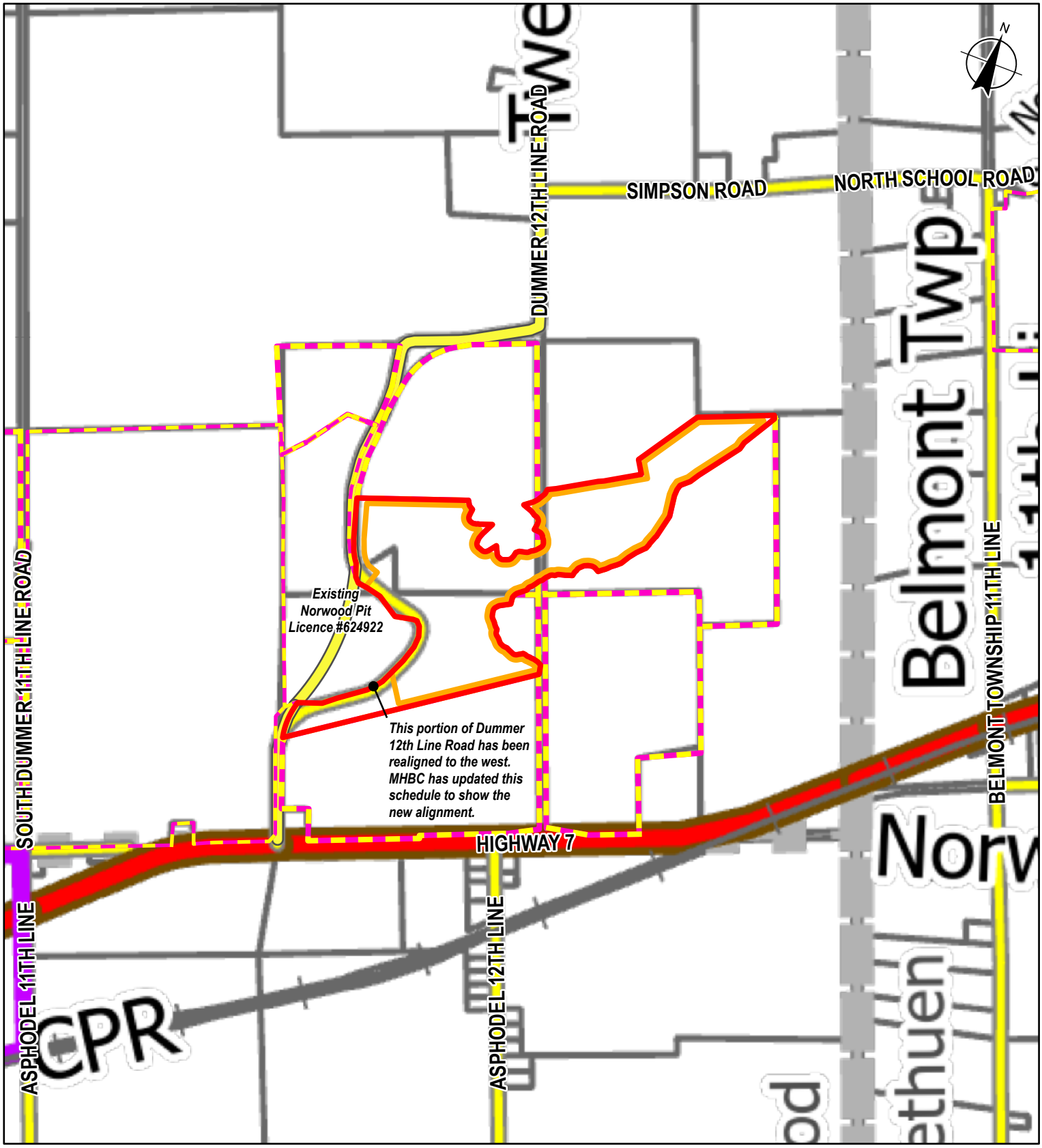

FIGURE #3
Transportation Schedule
Township of Douro-Dummer

Addendum Report
Norwood Pit Extension
Part Lot 1 & 2, Con. 11
Part Lot 2, Con. 12
Geographic Township of Dummer
Township of Douro-Dummer
County of Peterborough

LEGEND

- Proposed Norwood Pit Extension Licence Boundary
- Proposed Norwood Pit Extension Limit of Extraction
- Additional Lands Owned by Applicant
- Provincial Highways
- Township Roads
- Railroad Track
- Municipal Boundaries
- Settlement Area

DATE: September, 2026

SOURCES
Township of Douro-Dummer
Official Plan - Transportation Schedule

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MHBC PLANNING URBAN DESIGN & LANDSCAPE ARCHITECTURE

A

Appendix A

-DRAFT-

Recommended Amendment to the County of Peterborough Official Plan No. XX

INTRODUCTORY STATEMENT

All of this part constitutes Amendment No. XX to the County of Peterborough Official Plan 2026 (Approved by MMAH in August 2026).

The subject lands of the proposed Official Plan Amendment (OPA) are located at Part of Lot 1, Concession 11 and Part of Road Allowance Between Concessions 11 and 12 (former geographic Township of Dummer), Township of Douro-Dummer, County of Peterborough. The purpose of this amendment is to allow for the development of the proposed Norwood Pit Extension to permit mineral aggregate extraction. The lands subject to the OPA are approximately 11.9 hectares.

DETAILS OF THE AMENDMENT

The Amendment consists of one (1) item:

Item 1. Section 11.2.X shall be added to the County of Peterborough Official Plan:

"For the lands legally described as Part of Lot 1, Concession 11 and Part of Road Allowance Between Concessions 11 and 12 (former geographic Township of Dummer), Township of Douro-Dummer, County of Peterborough, as shown on Map 'DD-8' – Township of Douro-Dummer Land Use Schedule, an Extractive Industrial use shall be permitted."