

VIA EMAIL

September 18, 2025

Township of Armour
PO Box 533, 56 Ontario Street
Burk's Falls, Ontario
P0A 1C0

ATTN: Charlene Watt

Re: Applications for Official Plan and Zoning By-law Amendment
Town File: 2025-01
219 Peggs Mountain Road
Township of Armour, ON
Our File: SOL/ARM/25-01

On behalf PowerBank, Zelinka Priamo Ltd. is pleased to submit this letter to summarize the current status of the circulation of the Official Plan and Zoning By-law Amendment applications at 219 Peggs Mountain Road ("Site"), being Town file 2025-01 ("The Applications"). This letter also serves as a request that the municipality proceed with processing The Applications and that they be scheduled for Council consideration.

BACKGROUND

The Applications seek to facilitate development of a Battery Energy Storage System ("BESS") on the Site. PowerBank has been engaged with the Town on the proposed BESS and associated applications since late 2022, with The Applications being deemed as "complete" on January 21, 2025.

The Township has been engaged with Peer Review partners, including Tulloch Engineering and PLC Fire, to provide assistance in the review of the materials submitted as part of The Applications. PowerBank received the first round of peer review comments between April 23, 2025 and June 24, 2025. Subsequent resubmissions were made to the Town, which included revised materials and responses to peer review comments. Peer reviewers have generally reviewed the revised materials and responded accordingly. The following table summarizes the materials requested as part of the review of The Applications, and their current status:

Report/Discipline	Status
Stormwater Management	With township since Aug 13, 2025
Noise, Vibration, Odour	Clearance Provided by Peer Reviewer (Aug 18, 2025)
Planning	Clearance Provided by Peer Reviewer (Sept 8, 2025)
Environmental Impact Study	Clearance Provided by Peer Reviewer (Sep 17, 2025)
Emergency Response Plan	With Township since Sept 3, 2025
Vegetation Plan	Clearance Provided by Peer Reviewer (Aug 18, 2025)
Firefighter Training	Peer Review comments Aug 21, 2025 - Discussion with PLC Fire August 28, 2025
Environmental Site Assessment	Clearance Provided by Peer Reviewer (Jul 14, 2025)
Hazard Mitigation Analysis	With township since Aug 12, 2025
Commissioning Plan	Clearance Provided by Peer Reviewer (Jul 29, 2025)
Decommissioning Plan	Clearance Provided by Peer Reviewer (Jul 29, 2025)

REQUEST FOR NEXT STEPS

PowerBank requests that the municipality proceed with the processing of The Applications, and that they be scheduled for council consideration, for the following reasons:

As of this letter, there are no outstanding peer-review concerns with respect to the Noise, Vibration or Odour Report; the Planning Analysis; Environmental Impact Study; Vegetation Management Plan; Environmental Site Assessment; Commissioning Plan; or Decommissioning Plan.

As discussed with Rudy Cronk of PLC Fire on August 28, 2025, it is our understanding that the “Firefighter Training” program is a matter that needs to be in place prior to the use being operational, and is not necessary to establish appropriate zoning standards for the BESS. It is our suggestion and planning opinion that this detailed design related matter can appropriately be implemented through future processes, without needing to delay a decision for The Applications. In our submission, this approach is appropriate to be extended to the “Emergency Response Plan”; “Hazard Mitigation Analysis”; and “Stormwater Management Plan”.

The proponent is required to proceed through a “Site Plan Approval” application, through which detailed design related matters are reviewed, and the development of the Site will be implemented through an agreement with the municipality. PowerBank recommends that the municipality include provisions in the site plan agreement for matters that include the implementation of the Firefighter Training program, Emergency Response Plan, Hazard Mitigation Analysis, and Stormwater Management Plan, as needed.

It is acknowledged that the aforementioned materials serve an important role in the development of the proposed BESS; however, what has become clear in the peer review of these materials is that they are not anticipated to have impact on The Applications for Official Plan Amendment or Zoning By-law Amendment. Those materials are related to detailed design and the implementation of the BESS.

PowerBank and their consultants continue to be engaged with the municipality and with the Peer Review partners, and it is our hope that further materials receive clearance prior to Council consideration, as these reviews remain ongoing. In our opinion, the outstanding items do not warrant delay to consideration of The Applications.

The Peer Review of the Planning Analysis does not dispute that The Applications (including the supporting technical analysis), are consistent with the Provincial Planning Statement 2024, and represent good planning with the information available to review. There is sufficient information for Council to make an informed decision on the Applications and we ask that the municipality proceed with next steps, including scheduling the Public Meeting and Council consideration as time permits.

Should you have any questions, please contact the undersigned.

Yours very truly,

ZELINKA PRIAMO LTD.



Rob MacFarlane, MPL, MCIP, RPP
Senior Associate