

March 1, 2018

Protecting Water
Ministry of Municipal Affairs
Provincial Planning Policy Branch
777 Bay Street, 13th Floor
Toronto, ON M5G 2E5

Dear Sir or Madam:

RE: OSSGA Comments on Protecting Water for Future Generations: Growing the Greenbelt in the Outer Ring
EBR Registry #: 013-1661

Introduction

OSSGA is a not-for-profit association representing over 280 sand, gravel and crushed stone producers and suppliers of valuable industry products and services. Collectively, our members supply the majority of the 164 million tonnes of aggregate consumed, on average, annually in the province to build and maintain Ontario's infrastructure needs. OSSGA works in partnership with government and the public to promote a safe and competitive aggregate industry contributing to the creation of complete communities in the province.

We appreciate the opportunity to provide comments on the government's proposal to expand the Greenbelt Plan within the outer ring of the Greater Golden Horseshoe (GGH). We look forward to having an opportunity to meet in person with officials to discuss and explain these comments in more detail.

The Importance of Close to Market Aggregate Supply for the GGH

The study area for the potential Greenbelt expansion contains significant aggregate resources (particularly sand and gravel resources) that are located close to market. These important resource areas include outwash plains in Puslinch, North Dumfries and Brant, the Speed River spillway and the Oro moraine. These significant resources will be needed to accommodate the substantial growth that is planned for the GGH (13.5 million people by 2041).

Unsurprisingly, the GGH demands and consumes a large portion of Ontario's aggregate production. Aggregate demand will be higher in the next 20 years than it was in the past 20 years. The GGH accounts for just over half of Ontario's aggregate consumption. It will need on average, 100 million tonnes of aggregate per year for the next 20 years. The GGH relies on the outer-ring for much of its aggregate needs including lands within the study area.

There is a public interest in having an abundant, close to market supply for a full range of quality products in competitive holdings. This is reflected in the 2014 PPS: *"As much of the mineral aggregate resources as is realistically possible shall be made available as close to markets as possible."* Any decisions with respect to the proposed Greenbelt expansion should be consistent with this direction.

Not all aggregate resources are the same in terms of quality and type, and not all aggregate is suitable for use in infrastructure and development projects. Infrastructure built with high quality aggregate resources has the potential to last for decades, even centuries which can help decrease the life cycle cost of infrastructure investment.

There is a scarcity of high quality aggregate reserves close to market which are essential to major infrastructure projects and the types of development contemplated by the Growth Plan. New supply is not being licensed at sustainable rates (approximately 3:1 consumption to replacement ratio) due to increasing government restrictions (per the changes in the 2017 Provincial Plans), longer timelines, the added cost to put a successful application forward and the increased risk of failure.

It is not unrealistic to suggest that in future years, 200 to 300 km round trips will be required to meet the growing needs of the GGH. This does not represent the principles behind close to market. Such travel distances increase transportation costs, wear and tear and congestion on infrastructure, greenhouse gas emissions, fuel consumption, more trucks on the road, earlier start times, etc.

These are all critical considerations that the Province must account for in any discussions or decisions regarding the potential Greenbelt expansion particularly given that the study area includes substantial reserve areas of primary sand and gravel (the highest quality sand and gravel). The Province should avoid further actions that would restrict access to these high quality resources.

The Province's consultation document acknowledges that aggregate resources are a non-renewable resource essential for the continued growth and development of the region, and that sand and gravel deposits form the moraines within the study area. It recognizes that close to market is a key consideration for aggregate operations because of the economic and environmental impacts of transport.

It should be noted that not all moraines are geologically or environmentally significant. These may include areas of hummocky topography with limited natural features and functions that contain deposits of sand and gravel resources.

Before moving forward with the Greenbelt expansion, the Province should fully consider the potential impacts of such a decision on the protection and management of aggregate resources. Based on the policies in the 2017 Provincial Plans, we have significant concerns that a Greenbelt expansion would further sterilize significant aggregate resources that are located close to market. Rather than protecting and enhancing natural features and their functions, the Provincial Plans prohibit compatible forms of development including aggregate extraction in areas that do not warrant absolute protection (e.g. endangered species habitat prohibition).

We would note that the County of Simcoe has raised concerns about how *"the potential expansion of the Greenbelt would affect planning for things such as mineral aggregate extraction and making the resources available as close to market as possible"* (p. 4, Report CO-18-001, January 23, 2018).

Complex and Overlapping Policies

The lands within the study area are subject to the 2017 Growth Plan, 2014 Provincial Policy Statement, municipal official plans and zoning by-laws (in several cases, upper- and lower-tier with dedicated planning departments), Source Water Protection Plans, Conservation Authority regulations and other municipal, provincial and federal policies and regulations.

The 2017 Growth Plan was substantially revised particularly for rural resources to be more consistent with the policies and direction provided in the 2017 Greenbelt Plan (as a note, the Protecting What is Valuable section of the Growth Plan increased from 3 pages in the 2006 Growth Plan to 15 pages). To suggest that features such as wetlands or coldwater streams in the Growth Plan Area are left unprotected or at risk of being developed is inaccurate and misleading particularly given the numerous policies the Province has introduced in the last five years notwithstanding other levels of government.

The water resource features referred to in the consultation document are already protected from incompatible development as outlined in the Growth Plan, PPS and municipal official plans. For example:

- GP 1.2.1: *“Protect and enhance natural heritage, hydrologic, and landform systems, features, and functions.”*
- GP 4.2.1.2: *“Water resource systems will be identified, informed by watershed planning and other available information, and the appropriate designations and policies will be applied in official plans to provide for the long-term protection of key hydrologic features, key hydrologic areas, and their functions.”*
- GP 4.2.3.1: *“Outside of settlement areas, development or site alteration is not permitted in key natural heritage features that are part of the Natural Heritage System or in key hydrologic features, except for...”*
- GP definition of Key Hydrologic Features: *“Permanent streams, intermittent streams, inland lakes and their littoral zones, seepage areas and springs, and wetlands.”*
- PPS 2.1.2: *“The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.”*
- PPS 2.2.2: *“Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored.”*

In addition to these policies, lands within the study area are subject to Source Water Protection Plans and Conservation Authority regulations which accomplish many of the outcomes the Province is intending to achieve through Greenbelt expansion.

As noted in the consultation document, *“the Greenbelt and the Growth Plan are aligned with and build on the PPS to provide policy direction for natural heritage features and areas including significant wetlands, significant woodlands, fish habitat and habitat of endangered and threatened species”*. Important features and functions are not left unprotected within the study area.

Growth Plan Natural Heritage System

On February 9, 2018, the Province finalized the mapping for the Natural Heritage System in the Growth Plan. According to the Growth Plan, the Natural Heritage System will support a comprehensive, integrated, and long-term approach to planning for the protection of the region's natural heritage and biodiversity. Lands within the Natural Heritage System are subject to specific policies in the 2017 Growth Plan. It is unclear why there is a need to consider expanding the Greenbelt in combination with existing provincial policies and the Natural Heritage System mapping which municipalities are required to implement in their official plans in conformity with the Growth Plan.

Closing

OSSGA has significant concerns with a proposed Greenbelt expansion that will likely further hinder and restrict access to significant aggregate resources that are needed close to market. This could in turn produce negative environmental and economic impacts such as increased greenhouse gas emissions from longer travel distances and increased costs to replace infrastructure constructed with lower-grade aggregate materials.

We would like to set up a meeting with MMA staff to discuss these concerns and the recent decisions that have substantially impacted our industry's ability to licence new reserves and support growth in the GGH. If the Province decides to move forward with the Greenbelt expansion, OSSGA would like to be involved in the consultation on a proposed new boundary.

Thank you for the opportunity to provide comments and we look forward to your response.

Respectfully Submitted,

Ontario Stone, Sand & Gravel Association (OSSGA)



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