



February 25, 2019

**Ontario Growth Secretariat**  
**Ministry of Municipal Affairs and Housing**  
777 Bay Street  
23rd Floor, Suite 2304  
Toronto, ON M5G 2E5

Dear Sir or Madam

**Re: Proposed Changes to the Greater Golden Horseshoe Growth Plan – ERO# 013-4504**

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Nelson Aggregate Co. (Nelson) is an aggregate and construction materials supply company that was founded in 1983. Nelson has seven pit and quarry operations that are located across southern Ontario in proximity to the markets they serve. Nelson manufactures and distributes crushed limestone, sand and gravel, and asphalt products that are utilized by the construction industry for uses such as roads, rail ballasts, sewer and water-mains, commercial/residential development, creek rehabilitation and erosion control.

Nelson is a major contributor to the local and regional economies in which it operates and is a recognized leader in environmental stewardship, sustainable development, land rehabilitation, and best practices in aggregate operations.

Nelson is a member of the Ontario, Stone, Sand & Gravel Association (OSSGA) and supports OSSGA's comments and recommended revisions to the Growth Plan as outlined in their letter dated February 4, 2019. This year I am also the Chair of the OSSGA Board.

The Growth Plan and proposed revisions to the plan are intended to increase housing supply and economic growth in the GGH. The growth envisioned by this plan will require 2.5 billion tonnes of aggregate in the GGH over the next 25 years, of which 1.5 billion tonnes is needed in the GTA. Despite this, the Growth Plan and proposed changes will further sterilize access to important aggregate areas. There is already a proven gap between the consumption rate of aggregates and the rate of licensing new supply in key market areas such as the GTA. For example, in 1992 the GTA imported 40% of its aggregate needs and in 2017 this increased to 72%.

The current policy framework is not working. Approvals for new mineral aggregate operations in Southern Ontario are taking up to 10 years to complete the process. There are too many overlapping policies and inconsistent approaches between the Provincial Plans, Regional Official Plans, Local Official

Plans and Conservation Authority policies regarding the management of this essential non-renewable resource.

One of the proposed revisions to the Growth Plan will exacerbate this problem. The proposed amendment to the Growth Plan includes the following new policy (4.2.2.4):

*Provincial mapping of the Natural Heritage System for the Growth Plan does not apply until it has been implemented in the applicable upper- or single-tier official plan. Until that time, the policies in this Plan that refer to the Natural Heritage System for the Growth Plan will apply outside settlement areas to the natural heritage systems identified in official plans that were approved and in effect as of July 1, 2017.*

This policy essentially provides municipalities the ability to use existing and future Natural Heritage System mapping to prohibit new mineral aggregate operations and this will undermine the provincial interest in protecting the resource and ensuring it is available close to market.

The problem is that regional and local Official Plans include locally significant natural heritage features within their NHS and the prohibitions for new mineral aggregate operations as outlined in 4.2.8.2 of the Growth Plan should not apply to these areas. For example:

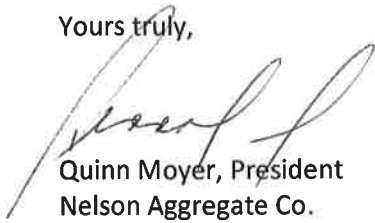
- Almost all new aggregate sites in the GGH contain habitat of endangered and threatened species as a result of the 171 species listed by the Province and how habitat is defined which results in large areas being mapped. Automatically prohibiting extraction in these areas undermines the Province's Endangered Species Act which allows for development subject to providing an overall net benefit to the species.
- Woodlands as small as 0.5 ha are deemed significant woodlands and some woodlands that have limited to no ecological function are deemed significant based on the size of the woodland alone. Again, these types of features should not prohibit access to the highest quality aggregate resources in the GGH.

For example, the following three photos are from a property we own that contains the highest quality aggregate in southern Ontario and this plantation is considered a significant woodland and extraction would be prohibited for new operations within the Natural Heritage System.



To ensure the protection and future availability of mineral aggregate resources, OSSGA has provided suggested policy revisions to Section 4.2.8 of the Growth Plan. Without changes to Section 4.2.8 the Province will not be open for business in a manner which promotes a healthy economy and natural environment. The recommended policy changes will ensure extraction results in an overall net benefit/gain to the natural environment while restoring confidence in the aggregate industry's ability to invest in the application process to make this resource available.

Yours truly,



Quinn Moyer, President  
Nelson Aggregate Co.

cc. Jae Truesdell, Policy Advisor, Planning, Zoning and Development, Ministers Office, MMAH  
Cordelia Clarke Julien, Assistant Deputy Minister, Ontario Growth Secretariat, MMAH  
Ala Boyd, Director, Natural Resources Conservation Policy Branch, MNRF  
Jake Sikora, Senior Policy Advisor and Stakeholder Relations, MNRF