

June 22, 2023

**By E-Mail Only to [growthplanning@ontario.ca](mailto:growthplanning@ontario.ca)**

Honourable Minister Steve Clark  
Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
777 Bay Street, 13<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Dear Minister Clark:

**Re: ERO Posting No. 019-6813  
Review of the Proposed Provincial Planning Statement  
Increasing Housing Supply on Former Aggregate Lands**

We are counsel to Aecon Infrastructure Management Inc. (“**Aecon**”), the owner of multiple aggregate operations in the Province, including the Aecon Caledon Pit located in the vicinity of Highway 10 and Charleston Sideroad in the Town of Caledon (the “**Caledon Pit**”). The Caledon Pit has a total area of 572 hectares (1,413 acres) and is located adjacent to Caledon Village.

The aggregate operation at the Caledon Pit is ongoing. However, certain parts of the operation will be concluded in the near future, allowing Aecon to begin its rehabilitation process. Aecon recognizes that land for complete communities, including much needed housing, is a priority for Ontarians. Understanding that, Aecon is exploring opportunities for the productive reuse of the Caledon Pit, including its potential to contribute to the development of much needed housing in the Town and Province and bring growth to the Caledon Village community.

Aecon is supportive of the proposed Provincial Planning Statement (the “**PPS**”), which is intended to simplify existing planning policies and speed-up approvals. That said, Aecon sees potential for further planning policy improvements which would help businesses and homebuyers by allowing more homes to be built faster.

### **Support for the Town of Caledon as a Large and Fast-Growing Municipality**

Having strong roots in the Town of Caledon through both its operations and employees, Aecon sees the Town’s incredible growth potential. Aecon is pleased to see that potential recognized by the Province through the proposed Large and Fast-Growing Municipality designation. That designation acknowledges the Town’s important role in accommodating

growth in the Province through its many different communities which are well suited to meeting the lifestyle needs of all Ontarians.

### **Maintaining Appropriate Criteria for Settlement Area Expansions in the Greenbelt**

Changes proposed in the new PPS would remove the requirement for settlement areas to be expanded or established only through the long and relatively infrequent process of a municipal comprehensive review. Instead, the proposed new policies will allow for such expansions to be proposed and considered through Official Plan Amendments initiated at any time on the basis of more suitable, stream-lined criteria. Aecon is supportive of these policy changes, which will help to ensure that land is available when needed to bring new homes and jobs on stream quicker.

We understand that the Province is intending to complete a housekeeping amendment to the Greenbelt Plan to reflect the new PPS policies. While it is important to ensure that appropriate controls are maintained on settlement boundary expansions within the Greenbelt Plan, such controls should be consistent with the policy direction in the new PPS and not continue to be burdened by out-dated policy. Aecon requests that the housekeeping amendments to the Greenbelt Plan modify s. 3.4.3(3) of the Greenbelt Plan to reflect the settlement area expansion requirements and criteria of the new PPS.

### **More Land Supply for Homes and Businesses on Rehabilitated Aggregate Sites**

Aecon believes there is an opportunity to increase the residential land supply through a more flexible approach to rehabilitation of aggregate sites that permits residential and other community land uses as an option. This vision is shared by the Town of Caledon, as illustrated in the Town's Rehabilitation Master Plan ("RMP") which contemplates the future development of aggregate sites surrounding Caledon Village, including a portion of the Caledon Pit lands, with a range of land uses including residential.

The inclusion of flexible policy language in the new PPS that allows for the establishment of communities on rehabilitated aggregate sites, where feasible, would ensure that initiatives like the RMP could be implemented locally. This approach would help to expedite the provision of new housing supply and the implementation of the RMP's vision.

### **Conclusion**

With the Town of Caledon being recognized as a Large and Fast-Growing Municipality, special efforts will be required to accommodate growth. Accommodating growth may necessitate settlement boundary expansions across the Town's various settlements to ensure the diverse needs of Ontarians can be met. Allowing flexibility for the reuse of former aggregate sites and establishing a policy framework to integrate them into settlement areas, where feasible, will allow the Province to create significant new options for building more homes faster, while minimizing new disturbance of lands in order to accommodate expected growth. Furthermore, this approach will contribute to the growth

of the Caledon Village community by providing additional facilities and amenities to support its evolving needs.

We thank you for the opportunity to provide comments on this initiative and for your consideration of Aecon's comments. We would be pleased to discuss this submission further with you or Ministry staff.

Yours truly,  
**DAVIES HOWE LLP**



Meaghan McDermid

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copy: Client