

TO: Minister Steve Clark, Ministry of Municipal Affairs and Housing, [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

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FROM: Bryan Smith, President, Gravel Watch Ontario

RE: Proposed Changes to the Growth Plan, ERO# 019-1680

DATE: July 20, 2020

**The Oxford Coalition for Social Justice**

The Oxford Coalition is a broad, non-partisan group based in rural Ontario with a mandate to improve the quality of life through environmental and social justice action. That mandate leads us squarely to commenting on policies which can improve community, human and environmental health and offering improvements to policies which do not yet meet these aims. Our focus is regional, provincial, national and international. While the bulk of our time is spent working on, with and for local and provincial improvements, we are also aware that national and international situations may occasionally require our comment or action. Similarly, members of the Oxford Coalition for Social Justice are active in the community making those improvements we envision. We offer these remarks in good faith and hope that they are accepted as such.

**The Role of Mineral Aggregate Resources**

The Oxford Coalition for Social Justice, is a member group in Gravel Watch Ontario and agrees with their comments on mineral aggregate resources, their availability and necessity, their value relative to community, human and environmental health, and the need for better assessment of quantities and policies related to them. We cite their main comment below.

*Among the changes proposed for the Growth Plan are several related to mineral aggregate operations which is our area of expertise and experience. [The Oxford Coalition for Social Justice ] is aware that “mineral aggregate resources play a crucial role in the development of housing and municipal infrastructure” currently, though we are aware of the role forestry and other resources play in building construction, and their increasing place in that sector, which will have impact on projections for aggregate. Ontario has no problem “ensuring adequate aggregate resources are available”. Since the 1970, prophets for the industry have reported crises in supply; despite this neither Gravel Watch nor any group we have contacted has shown that any private or public building project has been delayed due to lack of supply. Indeed, the declining price of aggregate would suggest a more than adequate supply readily available in all Ontario markets. Additionally, the fact that Ontario exports significant quantities of aggregate undermines a theory of a shortage. Calculating these factors into consumption “is critical to achieving the success of A Place to Grow” in such a way that will benefit communities. [The Oxford Coalition for Social Justice] is not convinced that “the proposed changes would make it easier [on communities] to establish new mineral aggregate operations closer to market throughout the GGH outside of the Greenbelt”. Other than urban aggregate reprocessing (aka recycling) which could produce significant volumes, [The Oxford Coalition for Social Justice] is not persuaded that proximity to market by multiple competing vendors is necessary currently or in the foreseeable future projected to 2051.*

Further, the Oxford Coalition for Social Justice adds the following remarks:

**Natural Heritage Systems and Endangered Species**

The Oxford Coalition for Social Justice is opposed to the changes to “remove the prohibition on new mineral aggregate operations, wayside pits and quarries from habitats of endangered species and threatened species within the Natural Heritage System for the Growth Plan”. As stated above by Gravel Watch, our group has not seen adequate proof that currently licenced aggregate supplies in Ontario cannot supply the projected need and has encouraged the Ministry of Natural Resources to better assess the relationship between licensed resources, previous extraction at those sites and projected consumption. Oxford County contains one of the Top Aggregate Producing Municipalities of Ontario; manyview vast expanses of the area as blighted land and unnecessary disruption of community, family and personal life. The Jensen Report (which we would be glad to make available) would be a good place for the province to begin in assessing availability across the province. Conversely, the Oxford Coalition for Social Justice is persuaded by Ontario Nature, Environmental Defense and others that habitats for endangered species are themselves endangered by various pressures, their limited numbers and connectivity, and their natural fragility. The Oxford Coalition for Social Justice has endorsed a recent report by Ontario Nature to your ministry and hopes it will receive the attention it deserves.

**Hydrologic Functions**

Ecological Function of necessity includes hydrologic functions without which “biological, physical, chemical and socio-economic interactions” wither. In light of the Province’s moratorium on water bottling, the discussions of “water budgets”, recent meteorological and hydrological drought in Ontario and the likelihood that continuance or repetition of these could result in agricultural and socioeconomic drought, it seems wise to retain and expand the role of hydrology in determining appropriate land use and growth. Ontario has had previous experience with inadequate care for and of water – ground water, surface water and drinking water – and knows that the disastrous results at Walkerton or anything similar must not be repeated. It is equally evident that pits and quarries have impacts on both surface and ground water, cause them to intermingle, and affect their flows in a variety of negative ways. We depend on those water flows; their interruption or cessation has significant consequences.

**Prime Farmland and Food Sustainability**

Situated in rural Ontario, the Oxford Coalition for Social Justice is similarly aware of the multiple encroachments on prime farmland in Ontario. Aggregate extraction results in a direct reduction on an ‘interim’ basis of available lands. We are aware that the interim is more often decades than years and often generations. Subsequently, questionable quantity and quality of rehabilitation of pits and quarries do not restore that productive land in its entirety. In a previous report on rehabilitation of aggregate sites in Ontario, the Oxford Coalition for Social Justice highlighted the immediate dangers and the long-term disruption to community and ecological life that pits and quarries often represent. That report can again be made available to your ministry; little has changed in the interim, and certainly not for the better.

The potential of extraction and ancillary activities to cut through hydrological cycles and features disrupts surface and ground water required by agriculture and communities. The preservation of topsoil and the ecological functions which sustain fertility and productivity need to be priorities in a province where food is not only a major industry, but vital to sustainability. This latter aspect is especially critical as Ontario plans a recovery that will need to be less dependent on food imports from the traditional growing regions (e.g. drought-stricken California and COVID-infected Florida) of our southern neighbours. Given that the surrender date of licenses granted recently or in the immediate future may match the 2051 horizon, this could prolong already significant impacts.

**Cultural Landscapes**

Like natural heritage systems, cultural landscapes have significant current value. Although “modified by human activity” when “identified as having cultural heritage value or interest by a community, including an Indigenous community” or having “features such as buildings, structures, spaces, views, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association”, cultural landscapes may be subject to loss of value due to aggregate extraction activities in or adjacent to these. The Oxford Coalition for Social Justice is of the view that cultural landscapes’ value should be evaluated carefully, and account for the social, environmental, and economic benefits which currently and in the future can be derived from them. In a full cost accounting, accruing values of cultural landscapes should outweigh the declining value of aggregate. Further, in solidarity with First Nations, the Oxford Coalition for Social Justice calls for a fulsome respect and observance of the inherent and treaty rights of First Nations’ communities in the Thames River watershed and across Ontario with the Ontario government acting honestly and transparently with representing the right of the Crown.

**Post-COVID Growth Patterns**

While the Oxford Coalition for Social Justice does not possess specific expertise on population growth, we do note that the multiple aspects of the Growth Plan, as described by Davies Howe Land Development and Litigation, are all impacted by the changes to work, home and living which have been accelerated by the onslaught of COVID 19. “The population … contained in Schedule 3 for planning and managing growth, as a minimum” will be altered by the recent significant reductions in travel and the knock-on effects of concerns about future ability to reach family members or home when subsequent pandemics occur. The Hemson Reports’ already extraordinarily high estimates of population growth are likely now even more out of date or of less relevance in light of recently reduced immigration, a continuance of our shrinking birthrate, depopulation through pandemic spread and dangerous spikes in infant mortality. Increased development within current settlement areas are probable due to increased interest in active transportation (walking, biking, running) as alternatives to mass transit, car-sharing or paid fares. As a result, there will be a permanent decrease in the distance and time which people will spend between work and home. In many cases work and home spaces may be the same place. Intensification reduces the need for the construction of infrastructure. It does so by providing “a mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities” in tighter geographic boundaries. The reduction, and likely repurposing of office and retail space as teleworking and online retail continue their ascendancy will reduce need to construct new buildings significantly.

All of these reflect on the Provincial Policy Statement and suggest net reductions in the demand for aggregates in Ontario relative to the population. Like the calculations suggested which would factor licenses against stockpiles of aggregate, a full and reasonable accounting of population and employment patterns needs to account for the alterations in the 21st Century to industrial, commercial, and residential spaces and times and then project their impact on aggregate consumption.

The Oxford Coalition for Social Justice welcomes this and any opportunity to consult on Places to Grow, to strengthen communities locally and province-wide, to maintain and improve the quality of life, and to assist in planning beyond the COVID 19 recovery into a foreseeable and sustainable future. We look forward to and encourage additional conversation and consultation. With new electronic communications, multi-stakeholder forums and electronic meetings are distinctly possible even for those of us in rural Ontario. We would gladly expand these remarks, share previously prepared or new information and offer experience. Going forward toward 2051 means a Growth Plan which must be shaped to benefit all. The metaphor is somewhat disgusting but worthy of consideration: Not all growths are worth having – Most people have warts removed. Other growths require significant medical interventions, usually successful. We need a clear plan and to chart our way to beneficial, reasonable and desirable growth.

Sincerely,

Bryan Smith, President

The Oxford Coalition for Social Justice