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**To:** [Clerks](#)  
**Subject:** Written submission RE: 11-2021-RA CBM  
**Date:** July 17, 2022 12:59:50 PM

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Please accept this as my written submission in response to Application 11-2021-RA CBM; I have previously registered to participate in the July 25 public meeting on this application, and will be referring to these as part of any oral comments I may make during the meeting.

Cheers,

Ian Adams

To Mayor John Grant and council

I am writing with regard to the zoning application (11-2021-RA CBM) by CBM Aggregates to expand the company's south pit at Sunderland, on Part Lot 7/8/9 between Durham Regional Road 13 and Brock Township Conc. 2. I apologize in advance as some of this material has been presented in previous correspondence, but I think it is important to present a historical context along with the discussion on zoning.

My family purchased a 20-acre property on the south side of Regional Road 13 in 1975, where my parents have built their principal residence. There was no residence on the property previously, and by my estimation, the other five homes on that stretch between Sideroad 17 and the aggregate operations were constructed within the 10-year period prior to 1975.

Prior to any residential development, aggregate operations to the east had already been established by Hancock Sand & Gravel. The company was active on the north side of Regional Road 13, and in around 1967 had excavated two areas on the south side of the road — the main site being a pit of approximately 15 acres, with a small secondary area to the south-west of that pit.

By 1975, that pit had apparently not been touched in several years (my parents had been told by the real estate agent that it had been 'abandoned'), and it remained unused — certainly throughout my childhood and teen years.

CBM/St. Mary's Cement purchased the Hancock operations in around 1982, and carried on operations on the north side of 13. The south side remained untouched, though CBM erected a fence between our property and their property in around the mid-1980s.

It was in the period of the mid to late 1990s that CBM/St. Mary's turned their attention to the south side of 13, and began clearing the forested area to the south of our property. When my parents were informed that CBM would resume extraction on the lands bordering our property, they were assured there would be a 30-metre treed buffer between their property and the excavated area, though examining that site now, it could be challenged that it is either 30 metres, or that a significant amount of what should have been treed remains so. During the years that followed, my parents experienced noise and dust issues, and when concerns were raised, the response from CBM appears to have been 'too bad', and 'mind your own business'.

I have written to council previously about the loss of habitat that has resulted from CBM's operations, and will not repeat that here, other than to note that what was lost can never be restored. I will allow others to comment on the potential impact to the wetland areas, as well as the potential threat to residential water sources in the immediate area.

Needless to say, should this application move forward, my parents fear they will again be faced with noise and dust emanating from the road utilized by trucks to move aggregate from the south site to the north site for processing, and they are also very concerned about the impact on their well through CBM's proposed below-water table extraction..

I will now refer to the official plans for Brock Township and Durham Region, as official plans are intended to provide guidance for council decisions regarding land use.

In several areas, the township's official plan references a goal: "To maintain a high quality of life and secure the health, safety, convenience and well-being of the present and future residents of the area."

Section 2 speaks to the protection of the rural character of the community, and agricultural land, and under Section 2.2.2.2, the objective of the official plan is "to support the continuation of the agricultural operations in the township as an important component of the quality of life." Section 2.2.7 speaks further to the protection of rural and agricultural lands.

Section 2.2.4.2 speaks to supporting and enhancing aggregate production, but to do so that is "compatible with the rural and scenic character of the township."

Section 2.2.5.2 references protection of the natural environment, with an emphasis that recognizes Lake Simcoe, and "the associated rivers, streams and wetlands are essential to the quality of life in the township and to its economic prosperity."

Under Section 3.1, economic development, it again speaks to pursuing economic development "with due consideration for the environment, the social needs of the community, and its sustainability over time."

Turning to the region's official plan, it should be noted that this site has been identified under Section 9D.2.2 as "no expansion to an existing pit or quarry operation shall be permitted beyond the applicable Aggregate Resource Extraction Areas identified on Schedule 'A' and described on Schedule 'E' – Table 'E1', other than by amendment to this Plan and the appropriate area municipal zoning by-law." So while the region's official plan has contemplated that an amendment could be applied for, the region's official plan also notes "In the consideration of new or expanded Aggregate Resource Extraction Areas, potential impacts, and cumulative impacts on existing development and on residents located nearby, shall be fully assessed, with negative effects minimized to the fullest extent possible." Given that there are already issues of dust and noise with the existing operations, I don't believe there is any amount of mitigation that could adequately address the potential impact on neighbours.

Turning to the Provincial Policy Statement, the PPS speaks to the protection of rural areas, including under Section 1.1.5, that encourages "Development that is compatible with the rural landscape," and "Opportunities should be retained to locate new or expanding land uses that require separation from other uses." Under the section, Vision for Ontario's Land Use Planning System, it states: "The Province must ensure that its resources are managed in a

sustainable way to conserve biodiversity, protect essential ecological processes and public health and safety, provide for the production of food and fibre, minimize environmental and social impacts.” Under Section 2.5.2, “Extraction shall be undertaken in a manner which minimizes social, economic and environmental impacts.”

The immediate community has changed significantly in the 65 years since aggregate extraction was established in the area, to the point that rezoning agricultural land to permit an industrial use is completely incompatible to what has predominantly become a residential neighbourhood. It does not meet the tests of the official plans of either Brock or Durham, or the principles established in the provincial policy statement.

I will also remind this council of its support of the Town of Halton Hills motion for a moratorium on aggregate operations directed to the Province of Ontario. While I appreciate that an endorsement of motions such as this is generally well-meaning but essentially non-binding, I believe it still establishes a principle that this council should strive to achieve.

On that basis, this zoning amendment should be denied.

Sincerely yours

Ian Adams

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[REDACTED]

[REDACTED]

[REDACTED]