



The Corporation of the
City of Burlington

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File No.: 31.01-2

June 19, 1984

Ministry of Municipal Affairs and Housing,
Plans Administration Branch,
777 Bay Street,
Toronto, Ontario.
M5G 2E5

Attention: Mr. Z. Weing, Senior Planner

Re: PARKWAY BELT WEST PLAN, JULY 1978 DRAFT AMENDMENT
PROPOSED BY NATIONAL SEWER PIPE LIMITED TO PERMIT
A LANDFILL OPERATION AND ANCILLARY/COMPLEMENTARY
OPERATIONS IN CONJUNCTION WITH A QUARRY

Dear Mr. Weing:

National Sewer Pipe Limited, in a letter addressed to the Region of Halton and dated January 25, 1984, expressed through their consultant, The Proctor and Redfern Group, a desire to proceed with their proposed amendment to the Parkway Belt West Plan, July 1978. There is now some prospect that National Sewer Pipe Limited is considering moving ahead with their proposed Amendment independantly of the Region of Halton's Solid Waste Environmental Assessment Study. We had previously understood that National Sewer Pipe was not going to proceed with this application pending completion of the Region of Halton's Solid Waste Environmental Assessment Study, provided certain time lines were met.

To date, the Council of the Corporation of the City of Burlington has not taken a position on the merits of the National Sewer Pipe Limited proposal and have held that this proposal must be considered as a component of the Regional Solid Waste Environmental Assessment Study. However, in view of the Proctor and Redfern letter of January 25, 1984, we feel that at this time, it would be appropriate to submit our comments on the application to you.

The key elements of the proposed project as indicated in the draft Amendment include a short term shale quarrying operation; a short term non-hazardous waste landfill site with attendant ancillary/complementary uses which may include, but may not be limited to, a resource recovery facility, a refuse derived fuel (RDF) plant, an energy from waste (EFW) facility, a waste transfer facility, and a waste processing and conditioning facility; a longterm ultimate use of the landfill area; and a longterm use for the remainder of the property. These land uses relate to each other in a sequential order that recognizes the complementary but short term nature of the quarry and its attendant waste landfill rehabilitation program and their affect on the ultimate longterm use of the lands.

Our review of the draft Amendment, as proposed, has raised a number of concerns. These concerns generally are as follows:

- a) not enough detailed policy statements to describe and establish clearly the role and function of each of the proposed land uses;
- b) no comprehensive policy framework that relates the various land uses to each other in an established sequential short term and/or longterm order;
- c) no policy clearly establishing the roles of the Provincial agencies required to approve and monitor various parts of the project; and
- d) the technical format proposed for incorporating the draft Amendment into the text of the Parkway Belt West Plan, July 1978 is confusing.

Each of these concerns is briefly discussed:

- a) The draft Amendment, as proposed, is silent with respect to basic policies that minimally describe the land use proposed and establish how the land use is intended to function. As a case in point, one of the primary land uses is the shale quarry operation. However, the quarry is not dealt with by policy and therefore, does not address such aspects as on-site processing and/or stockpiling of the quarried shale, the quarrying methods and direction of operation or the stockpiling of

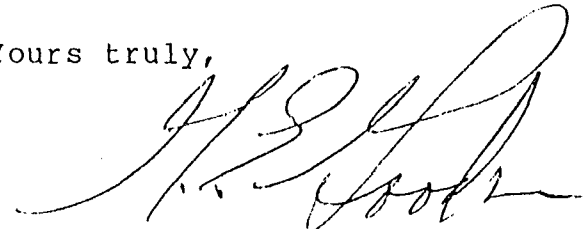
overburden. The same problem is apparent with respect to the non-hazardous waste landfill site. Without policy statements, the direction of landfilling, method of landfilling and the source of the waste are unknown.

- b) The draft Amendment as proposed does not provide an overall policy framework that clearly establishes the relationship of the proposed uses to each other in a time sequence that recognizes the various short and longterm characteristics. While the landfilling activity is generally considered a short term use, the question of the landfill ancillary/complementary uses continuing beyond the active life of the landfill use is not addressed by policy but includes facilities requiring substantial investment. The relationship between the rate of quarrying and the rate of landfilling is not considered and the timing of the final rehabilitation of the landfill cap is not addressed. A general policy framework linking the three uses and establishing an operational context is absent.
- c) The amendment proposes that the details of the quarry operation and the non-hazardous waste landfill site with the attendant ancillary/complementary uses be left to the licensing approval process of the Ministry of Natural Resources pursuant to The Pits and Quarries Control Act and to the Certificate of Approval process of the Ministry of the Environment pursuant to The Environmental Protection Act or applicable legislation. As discussed, there are no clear policy statements within the Amendment which ensure that the two required Provincial approvals would be granted within a single comprehensive policy framework. Without a clear policy framework, the roles and responsibilities of the two specified Provincial Ministries in such matters as the long term enforcement and monitoring of the quarry/landfill rehabilitation program are not clearly assigned.

- d) In terms of format, the draft Amendment as it is proposed to be incorporated in the Parkway Belt West Plan, July 1978, does not clearly focus on the subject property. The draft Amendment as proposed focuses on three property descriptions that are not mutually exclusive in either land area or in permitted land uses and is therefore extremely confusing. The draft Amendment also proposes to incorporate the three described areas in three distinct clauses that are individually numbered and physically separated, an approach which adds to the confusion.

In summary, it is our opinion that the draft Amendment, as proposed, does not include a substantive policy framework to guide the project and does not present a cohesive and coherent statement format.

Yours truly,



GARY E. GOODMAN,
Director of Planning.

HG/dc/
0128s

cc: National Sewer Pipe Ltd.
R. Mohammed, Region of Halton
M. Bacon, Proctor & Redfern

bcc: M. Boggs
M. Koevoets
D. Brown
L. Branch