

2/10/2025

# OBJECTION TO PROPOSED ASPHALT PLANT

ON Telephone Road, IN Cramahe Township,  
OF Northumberland County



**The CRAA**  
**Cramahe Resident Advocate Association**  
*An incorporated Not for Profit Association*

# OBJECTIONS

## To Proposed Asphalt Plant 13945 Telephone Rd, Colborne, ON Cramahe Township Northumberland County

### Table of Contents

Introduction .....	2
<i>Revised Objection</i>	
<i>In the nature of business</i>	
Governance .....	3
Community & History.....	4
Location Subject Property .....	5
Approved uses in an Extractive Zone .....	5, 7
Cramahe Official Plan	
Ontario PPS	
<i>Greater Golden Horseshoe (GGH) enacted of October 20, 2024</i>	
Topography .....	8
Objection .....	9 - 13
Recent Developments .....	14 – 21
Conclusion .....	22

## INTRODUCTION

We are a group of stakeholders in the Township of Cramahe who have incorporated a Not For Profit Association to advocate on behalf of Residents, Landowners, Farmers, Little Lake Cottage owners and developers who have serious concerns about the damages that would occur should a proposed Asphalt Plant be constructed on the subject lands known as 13945 Telephone Road On K0K 1S0 Part Lot 20 Concession 3 Cramahe Township.

### REVISED OBJECTION January 29, 2025

The Residents, Land Owners, Farmers and Little Lake Cottage owners of Cramahe Township object to the placement of an Asphalt Plant located on Part Lot 19 Concession 3, 13945 Telephone Rd. Cramahe Township.

We further object to the possibility that the council would allow the Asphalt Plant to operate 24 hours a day.

This Objection has been undated to more accurately reflect information gathered by stakeholders following a meeting held January 19, 2025 in Dundonald Ontario and includes additional signatures on the petition of Objection. Stakeholders and residents have only recently been made aware of the proposed changes to the subject property.

### In The Nature of Business

There are numerous Asphalt plants. These plants sell their products and services to governments, municipalities and individuals.

Much is being made of the proximity to the 401 in the case of this proposed plant. This proximity, it is assumed, would reduce cost which could then be configured into a "BID" that appears to save tax dollars initially.

The impact of this proposal will, in reality, cost the Tax Payers of Cramahe Township significant amounts. In a SWOT analysis, Cramahe residents will not only be exposed to higher taxes for road maintenance, but to market reduced valuations of their primary real estate holdings.

On the other side of this analysis, The "Pit" was a minor investment with major return possibilities should this proposal be approved. Without question Cramahe Township residents are supplementing the Profit Structure of a single business entity.

The question and Response matrix prepared by the Proponent and the Township, deliberately understates the scope and future growth of the proposal.

Of course, the "Pit" will **not** require 24-hour operations, there is no gravel left to extract. The Asphalt plant, however, requires 24-hour operational approval to secure a contract with the MTO.

Having already determined that Cost and Profit are the main motivating factors, we must also analyze the inevitable expansion of the Fidelity operation past the 401 Highway project.

The Ministry of Transportation of Ontario (MTO) maintains all roads in Ontario that are part of the provincial highway network. This includes King's Highways, secondary highways, and tertiary roads. The MTO also oversees winter maintenance for these roads.

A 24 hour operational approval would effectively apply to other networks overseen by the MTO as well as Regional and Municipal projects.

Once awarded, a 24-hour operation approval becomes an asset to the corporation and not one that is rescinded at the end of the project. To suggest this is both naive and untruthful.

There is, however, a cost hiding in plain site to Cramahe landowners, Little Lake lands and homeowners and to a fragile area known as the ‘Biddy Creek Watershed Conservation” area.

The hidden cost is described more fully throughout the matrix below.

## **Governance**

In reviewing the current and in force Cramahe Official Plan, several allowable activities on land that is designated as Aggregate Resources May be permitted. There are, however, exceptions to activities in the Official Plan when certain condition exist.

Business and individuals looking to invest in this area would believe that these exceptions in the official plan with regard to Environmental Zones, sensitive wetlands, road infrastructure, compatible uses and more, would be able to satisfy themselves that they could rely upon the good governance and responsible stewardship in Cramahe Township to protect their investment interests.

Due diligence before investing in Cramahe Township given this event, is compromised.

*Everyone in Canada has the right to the use and enjoyment of property, individually or in association with others, and the right not to be deprived thereof ...*

**Canadian Bill of Rights**

## COMMUNITY

This community, across Telephone Rd, Crandall Rd, Lake Rd and more, is an energetic area that includes farms, rural residences and recreational areas such as Little Lake and a very active well-established KOA. This population crosses Township Borders but remains a grouping of similarly spirited rural participants, all of whom believe our lifestyle, health and financial well-being is threatened by the proposal.

## HISTORY

Since the early 1970's Cramahe Township struggled to bring in industrial and large commercial businesses to the area despite the development of an Industrial Park. The Township's low-density population was an obstacle to Industry looking for skilled workers even though the Township and the Industrial Park are located strategically between Toronto and Montreal along the 401 corridors.

Requests for severances in rural and small farming areas flourished from the 1970's to today with the result that Cramahe's rural residential new building income added significantly to the financial stability of the township.

Several severances were approved along Crandall Rd., a 3.6 KLM stretch of road, where today more than fifty [50] residential homes are located. Seven residences on Crandall Rd back onto the Environmental Conservation Zone.

One home on Dunk Rd was severed and rezoned RR.

This home has sold several times since its original build. It sits at the south end of the existing site just south of the Environmental Protection zone.

All of these residents are on Private well systems. The 7 residential lots on Crandall Rd and One on Dunk Rd. have wells as shallow as 15 ft, have never run dry during draught conditions. Any changes to the Environmentally sensitive area will be felt immediately by these residents.

Crandall Rd. alone has more homes and available building lots than exist in the settlement area known as Edville.

Telephone Rd contributed to this buildup of Rural housing and has added to the community spirit of the area. It is a fair assessment to say that this rural community has supported Cramahe Township through their tax contributions throughout the years. The community extends along Telephone Rd. into Brighton Township where the rural vitality includes local entrepreneurs, small business entities, and homes all adding to the strength of the community. This community has continually upgraded their homes, built new homes and reinvested in their holdings ensuring the prosperity of the Township.

In both the Cramahe Official Plan and the Provincial Planning Statement of 2024 the site in question DOES NOT comply with Land Use Compatibility or the Separation of Incompatible land uses. In this case each zone is a threat to the other.

There are NO mitigating measures that could be put into place after the fact and no pressing need for another Asphalt plant in this location other than commerce. Long term pain for short term gain. The residence will ultimately subsidize the costs associated with road maintenance by virtue of their Tax Loads and suffer significant loss of property value, increased Insurance costs, and increased financing and maintenance costs.

## LOCATION – Subject Property “The Pit”

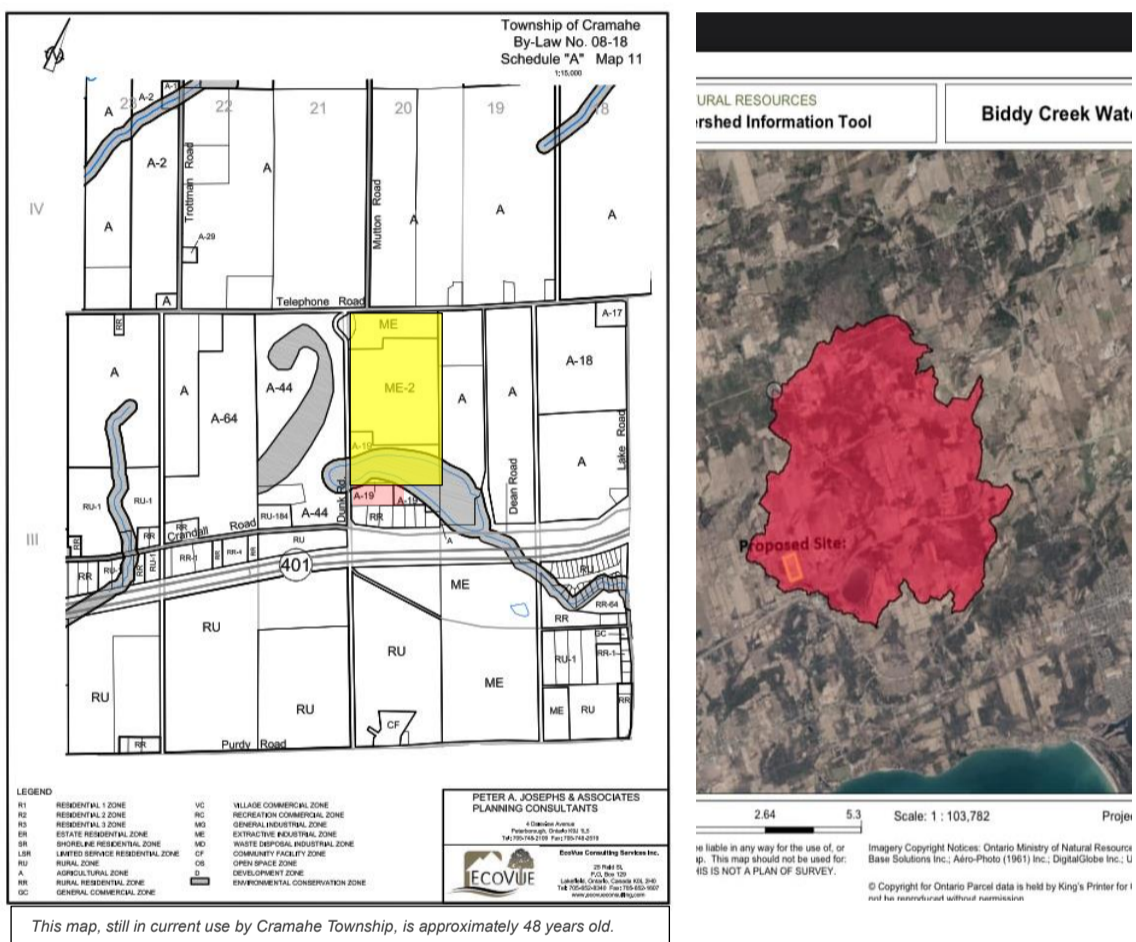
The “Pit” is located on the south side of Telephone Rd. This is the northern portion of the property. It is bordered to the west by Dunk Road. Dunk Road is an unmaintained road allowance but a necessary road to allow access to farm fields directly to the West of the subject property. Access to these fields is only available via Dunk Road.

The property on which “The Pit” is located, has two partially surrendered extraction licenses.

1. Original license # 3066 [ME on Map below] issued April 13, 1978
2. A secondary license # 624970 [ME 2 on Map below] issued March 8, 2011

The excavating activity over the years has exhausted “The Pit” of gravel. The subject land also includes an Environmental Zone to the south of the extractive licenses. This Environmental Zone is part of a much larger “**Biddy Creek Watershed**” a protected wetland.

Beyond the defined Environmental Zone are 8 severed parcels with housing on each. These homes are serviced by well and septic systems and front on Crandall Rd.



The A-19 Zoning on the map above [Highlighted in Red] is now in the RR zoning code today.

The land next to the Pit on the Eastern side of the subject lands include an operational Cattle Farm of about 36.6 acres with barns and a residence. The Pit is also bordered by a rural agricultural parcel of about 12 acres with a residence which fronts on Telephone Road as well.

The land on the Western side of the pit [A-44 on Map] is a mixed operational farm of about 90 acres. The lands are separated by an unmaintained road allowance known as “Dunk Road”. This farm property in places is 66 meters higher than the floor of the “Pit” and within 66 FEET of the proposed operation.

Due to this elevation of the Westerly property, some its farm fields are only accessible via Dunk Road.

Crandall Road has 50 homes and Telephone Road close to 100 homes. Both roads offer several lots available for building. Little Lake and area are exceptionally densely populated. All homes are serviced by well and septic.

There are a variety of home occupations and enterprises. A Christmas Tree Farm, Beef Farm, Mix Grain Farming, Kennel facilities, Horse Operations, Car and Tractor mechanics, Child Day

Care Facilities, a KOA, and recreation facilities on Little Lake and much more. School Buses are used to transport children to and from school in the area.

## Approved uses in an Extractive Zone

### Cramahe Township

*18.5 SPECIAL EXTRACTIVE INDUSTRIAL (ME) ZONES 18.5.1 Extractive Industrial-1 (ME-1) Zone Notwithstanding the uses permitted in the Extractive Industrial (ME) Zone, within the Extractive Industrial-1 (ME-1) Zone only the following uses shall be permitted:*

- (a) aggregate storage area*
- (b) agriculture*
- (c) aggregate processing plants, concrete batching plants and asphalt plants*
- (d) forestry and conservation uses*

*18.5.2 Extractive Industrial-2 (ME-2) Zone, Part Lot 20, Concession 3 Notwithstanding the provisions of Section 4.31.5 or any other provision of this By-law to the contrary, within the Extractive Industrial-2 (ME-2) Zone, a pit use may be located less than 100.0 metres (328.08 feet) of lands zoned Environmental Conservation (EC) or any water body or watercourse.*

## THE OFFICIAL PLAN OF THE TOWNSHIP OF CRAMAHE

OFFICE CONSOLIDATION  
MARCH 2024

### 5.1.29 Separation of Incompatible Uses

*Excerpt Page 42*

Council shall generally require that potentially conflicting land uses be adequately separated for the purpose of minimizing or reducing adverse effects of one land use upon another. This separation or buffer area may include open space, berms, walls, fences, vegetation plantings, or another land use different from the two conflicting ones but compatible with both. The buffer area may be of variable size, shape and composition to produce the desired results. Council may consult with the Ministry of the Environment or any other ministry or agency with respect to requirements for buffer areas. Council may have regard to guidelines of the Ministry of the Environment pertaining to *Land Use Compatibility* and *Compatibility Between Industrial Facilities and Sensitive Land Uses*.

*Excerpt Page 7*

## 4.3 Commercial and Industrial Development

### 4.3.1 Goal

To encourage commercial and industrial development in the Township to provide a well-balanced and varied economy that will best serve the needs of the residents of the Township as well as the travelling public.

### 4.3.2 Objectives

- (a) To maintain and strengthen the residential/farm to commercial/ industrial assessment ratio.
- (b) To promote future commercial/industrial development within proximity to existing designated commercial and industrial development.
- (c) To promote development on the lands traditionally designated for industrial uses for a broader range of industrial and compatible commercial uses so as to promote economic diversity and strength in the Township.
- (d) **To ensure that new commercial and industrial development is not located where it would jeopardize existing and future residential applications, disrupt recreational, or impact environmentally sensitive areas.**

- (e) To establish adequate separation distances between industrial uses and sensitive land uses.
- (f) To encourage commercial and industrial activities of a home occupation or home industry nature, throughout the Township.

Not all existing Extractive Industrial Zoned Pits are the same. Not all Pits are located in areas where the Industrial nature and permissible uses, such as *concrete batching plants and asphalt plants*, are separated enough from other uses to ensure that significant damage does not occur to either zone.

It is our assertion that Cramahe Township Council has a duty and a responsibility to determine whether an Existing Pit and its permitted uses would cause damage and create liabilities in an area that the Township itself has supported and developed a diverse Rural, Residential and Recreational settlement area.

## CONFORMITY WITH PROVINCIAL POLICY

### PROVINCIAL PLANNING STATEMENT, 2024

Under the *Planning Act*

#### 3.5 Land Use Compatibility

1. Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

Based on our review, the proposal to allow a concrete batching plant or Asphalt plant on this specific site does not conform to the relevant policies of the Provincial Policy Statement.

## GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (GGH) 2024

The Growth Plan for the Greater Golden Horseshoe was updated and took effect on October 20, 2024. The Growth Plan provides that lot creation outside of Settlement Areas is permitted on rural lands provided they meet the following criteria (Section 2.2.9(3)c):

- i. are compatible with the rural landscape and surrounding local land uses; The local area is a mix of residential and farm uses. The created lots will be similar in size and use to neighbouring existing residential lots.*
- ii. will be sustained by rural service levels; and Neighbouring residential lots are currently serviced by private well and septic systems. The proposed lots will be serviced in a similar fashion.*
- iii. will not adversely affect the protection of agricultural uses and other resource-based uses such as mineral aggregate operations.*

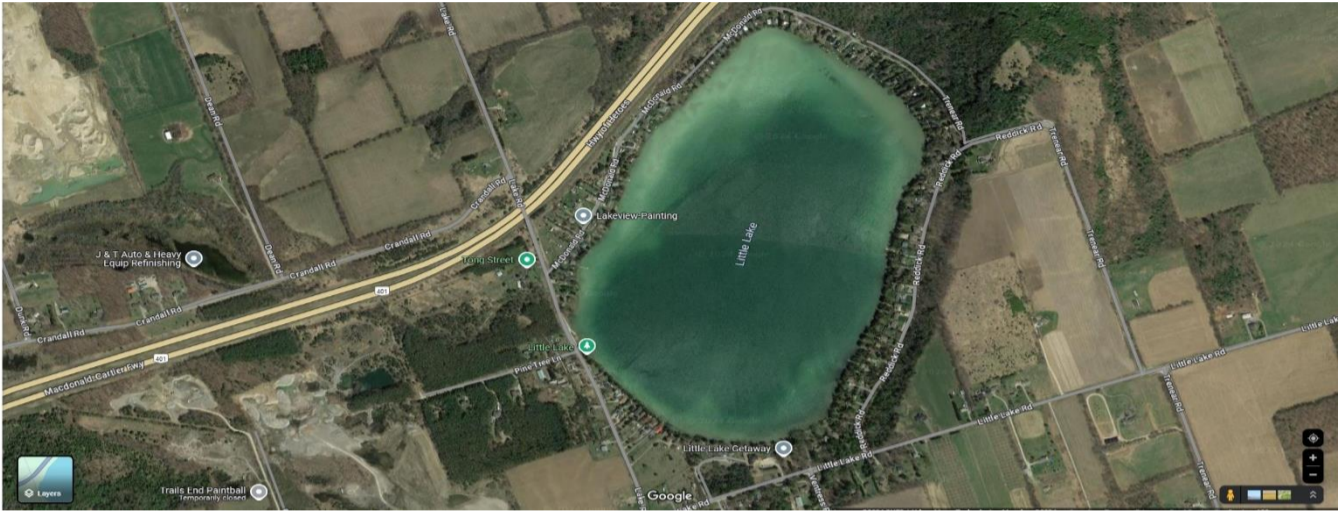
### Vision for the GGH

More than anything, the *Greater Golden Horseshoe (GGH)* will continue to be a great place to live, work and play. Its communities will be supported by a strong economy and an approach that puts people first. This approach protects the Greenbelt and will ensure a cleaner environment is passed on to future generations. A Place to Grow will support the achievement of *complete communities* with access to transit networks, protected employment zones and an increase in the amount and variety of housing available.

Today however, there is no aggregate left in the subject Pit. The proposal to build an Asphalt Plant threatens the “Great Place to live” component of the Vision Statement. Our intention is to list the risks, exposure hazards and perils this Proposal will create in this settlement area.

## TOPOGRAPHY

The subject land in this proposal is flat, low lying with a significant southerly slope ending in an area that is well below the water table and abuts the Environment Control Zoning.



This view of the Pit [upper left-hand corner], shows the south most area under water. It also highlights the housing density of Little Lake which is less than 2 Klm to the east of the Pit. An aqueduct conveys water under the Bridge at Lake Rd and the 401 and on to Little Lake.



This view of the Southern Portion of The Pit shows the extent to which dredging was done to siphon off water from excavated areas.

## OBJECTION

### TO THE PROPOSED ASPHALT PLANT ON THE SUBJECT LAND AND OBJECTING TO REQUEST TO OPERATE AN ASPHALT PLANT 24 HOURS A DAY

<p>Environmental Concerns</p> <p>Quantities of water are necessary to knock down airborne particulates and dust settling on cattle, farm animals and crops on farms directly adjacent to the subject lands.</p> <p>This water will seep into the environmentally sensitive area on the south end of the subject property and wells in the adjacent Rural Residential homes.</p> <p>Low lying land in this area is prone to flooding and runoff in spring.</p>	<p>The subject property is subject to an Environmental Zoning in the Southern End of the property. The Topography of the subject land slopes significantly southward, is very low lying and has standing water where excavation at one point went below the water table. Properties surrounding the subject lands are subject to flooding. These occurrences repeat more frequently with severe weather conditions as experienced throughout Ontario.</p> <p>The subject property is completely enclosed in the “Biddy Creek Watershed area as described in Schedule A attached.</p> <p>Risks associated with an Asphalt Plant are magnified in a 24-Hour operation. More accidents occur in poor visibility situations and Nighttime operations. It would require lighting to mitigate, to a degree, this peril. Even with a lighting mitigation effort, accidents are more frequent during nighttime operations.</p> <p>The risk of any type of accident in this environmentally significant area would be catastrophic. Liability and cost exposures due to damage would be high.</p>
<p>Properties Affected</p>	<p>The area affected by this proposal encompasses a large settlement area with hundreds of homes in the immediate area to more still in the Biddy Creek catchment area. It not only impacts landowners, Farmers, cottages but also business and recreational facilities that have flourished here. The taxes paid by landowners and businesses have supported the Township for years when all other income sources for a rural community did not exist</p>
<p>Noise Pollution, Quality of Life and right of enjoyment Concerns</p>	<p>Noxious odors and dangerous emissions would deprive residents from accessing fresh air. Windows would be tightly closed to prevent both fumes and emissions from penetrating their homes.</p>

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<p>Noise Pollution, Quality of Life and right of enjoyment Concerns con't</p>	<p>Noise from non-stop Truck traffic, diesel generators, heating mechanisms, loading, unloading and vehicle motion alarms used in visibility compromised settings for vehicles moving in reverse would destroy the Quality of Life and the right of enjoyment residents now have.</p> <p>Extending operations to 24 hours would significantly increase noise disturbances during nighttime hours, affecting residents sleep, health, and well-being.</p> <p>No clear mitigation measures have been provided to address this. I urge the Ministry to reject the project and the amendment to operate 24 hours a day unless independent noise studies and an Acoustic Report confirm no adverse effects on residents.</p>
<p>Light Pollution &amp; Environmental Impact</p>	<p>Overnight operations will introduce artificial lighting that can disrupt local wildlife habitats and interfere with residents' nighttime environment.</p> <p>Expanding operations to 24 hours will lead to increased artificial light pollution, which can disrupt local wildlife, including nocturnal animals and birds. The additional lighting will also affect residents who currently enjoy dark sky conditions. There is no mention of mitigation strategies such as shielded lighting or reduced brightness.</p> <p>I/We strongly recommend rejecting this proposal of an Asphalt plant along with the amendment allowing 24 hour a day operations. A comprehensive light pollution study should be done prior to approvals of any sort.,.</p>
<p>Environmental Degradation &amp; Air Quality</p>	<p>Continuous processing, loading, and shipping may increase airborne dust, emissions, and traffic-related pollution, potentially exceeding acceptable environmental limits.</p> <p>The amendment does not consider the increased impact on air quality from operations. Prolonged dust and emissions from truck traffic and processing activities. These activities will pose a risk to respiratory health, particularly for vulnerable populations such as children and seniors. We request an independent environmental assessment to analyze the impact on air quality before any decision is made.</p>

<p>Increased Truck Traffic &amp; Road Safety</p> <p><i>The Pit on the subject land has been depleted of it's gravel deposits Current Road Traffic reflects this reality.</i></p>	<p>The roads in Cramahe Township are chronically under maintained and are the main reason for notices from the Township of impending Tax increases</p> <p>The main roads the proposed plant would use are Municipal NOT Provincial. As the project scales up, the municipal roads would sustain levels of use not contemplated in design, safety or maintenance.</p> <p>Delivery of input materials including gravel, would need to be trucked <b>into</b> the site to produce and deliver tons of finished material off site. This would effectively double the quantity of trucks using our municipal roads. Trucks carrying in scrapped asphalt from existing roads and Highways would increase truck traffic yet again.</p> <p>We are deeply concerned about the potential increase in truck traffic at all hours of the day/night. The surrounding roads are not adequately prepared to handle an increase in heavy vehicles, posing a safety hazard for local commuters, school buses and farm vehicles. I /we request that a full traffic impact study be conducted before considering approval failing which approval should be withheld.</p>
<p>Lack of Community Consultation</p> <p><b>“Update” Council has quickly called a meeting for February 11, 2025</b></p>	<p>There has been little to no public consultation regarding this amendment, despite the significant impact it will have on residents. I /We oppose this change until local community meetings are held, allowing impacted residents to voice concerns and receive assurances regarding noise, air quality, and other environmental impacts.</p> <p>This issue has been in front of Cramahe Council since July of 2024. When pressed, the council has agreed to hold a special meeting on February 18<sup>th</sup> at 5:00 PM. This time slot did not consider residents who work normal hours and may not be able to attend due to those constraints.</p>
<p>Need for Stronger Compliance &amp; Oversight</p>	<p>Without strict monitoring and enforcement, a for-profit plant has little incentive to adhere to environmental regulations.</p> <p>There is no clear framework for how compliance will be monitored during regular hours let alone in 24-hour operations if approved. I /We urge the Ministry to reject this project and its amendment unless strict oversight, real-time air and noise monitoring, and enforceable penalties for violations are established.</p>

# OBJECTION

## TO THE PROPOSED ASPHALT PLANT ON THE SUBJECT LAND AND OBJECTING TO REQUEST TO OPERATE AN ASPHALT PLANT 24 HOURS A DAY

<p>Counterfactual land use introduces adverse selection in the market</p>	<p>Asphalt production In an Environmentally sensitive area, along with approval of for a 24-hour operation is not an “Additive” market value event, It is an adverse market event where decreased values would be anticipated.</p> <p>For those property owners nearest to the subject lands a drop in market value between 30%-50% is anticipated. With the addition of a 24-hour operation the impact is magnified.</p> <p>The Township would be impacted by lowered MPAC valuations and reduced tax income.</p> <p>We reject this proposal and the 24 hour a day operation amendment due to the damage it’s approval would do to the market value of the area.</p> <p>Future Township liabilities and potential damages are an important area for consideration.</p>
<p>Mortgaging, Loans and Equity improvement Loans for Homes and Business</p>	<p>In a meeting held on January 19, 2025, arranged by residents, a Banking representative explained how the affected area could potentially be REDLINED.</p> <p>This practice flags areas where contradicting land uses may impact values. Underwriting for mortgages, loans and equity improvement financing are scrutinized for risk exposure. The result is lower advances or outright rejection. This would result in higher interest rates due to risk and the need to approach lending institutions more willing to underwrite higher risk areas at a premium cost to owners.</p>
<p>Home and Business Insurance</p>	<p>Banking and Loan providers are not the only institutions that would REDLINE an area. Insurance Companies would scrutinize for the same risk to value.</p>
<p>In the Matrix offered by MHBC, on behalf of Fidelity the last entry speaks to income from aggregate sources and applied to Cramahe Road Administration.</p>	<p>The annual fee for aggregate removal is moot. There is <i>no/little</i> aggregate remaining on the site. Moreover, the income to the Township has not fully been explained.</p> <p>Is the amount of <b>\$232,751</b> income from ALL aggregate extracted in Cramahe Township. It is unclear what the source of this income is. Is it from corporate aggregate extraction or other government assistance.</p> <p>Additionally, this amount is insignificant in road maintenance and suggests that the residents and stakeholders in the Township of Cramahe will have to <b>supplement</b> an enterprise in a commercial venture for the purposes of profit.</p>

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<p>Changing dimensions of wetlands in an environment impacted by Climate Change</p>	<p>Minimum distance setback requirements from environmentally sensitive lands must be reevaluated in this climate of change. Some wetlands increase in size and expand when heavy rains and snow melt impact these areas.</p>
<p>Hazards</p>	<p>Fire &amp; Explosion have occurred at asphalt mix plants in Canada. Cutback and Rapid Curing Asphalt are Flammable. Typical or Medium to Slow Curing Asphalt is Combustible. Chemical foam to extinguish asphalt fire is a high-level “forever” pollutant to nearby water sources, wells and aqueducts.</p> <p>Cramahe Township fire Department does not have the means nor the expertise to handle a fire or explosion scenario. Cramahe would have to call in other Township Fire Fighters with Hazmat Training to control and mitigate this type of disaster.</p> <p>We ask that the Ministry reject the proposal and its amendment to operate 24 hours a day. We are not aware of any plan or schedule in place to protect workers on site or the local residents in the event such a disaster occurs, A plan should include provisions to restore or stop environmental damage.</p>
<p><b>Return on Investment</b></p>	<p>A pressing question we all have for our Council, is the expected return or advantage the Township will realize from this proposal.</p> <p>It is clear that the stakeholders in Cramahe Township including Little Lake Residents will become collateral damage in this development. But, what does this sacrifice, by the people of Cramahe give to the Township.</p> <p>What monetary impact will the Township enjoy if any?</p> <p>Councilors have stated that without the 24 hour a day operation, this proposal would not be worthwhile.</p>

## Recent Developments

Area Residence noticed an increase in truck volume on the roads in November of 2024. The pace became alarming as we noticed 60 trucks per hour moving fill from another property to the subject property. This pace of trucking went on through December and into January.

Most trucks unloaded at the subject property while others went on to dump fill at another site on Durham Street Colborne just north of Hwy 2. This site is an approved subdivision site owned by the same company as the existing Pit.

The fill was being excavated from another land holding of the owners of the subject lands. Two newly rezoned lots to RR at the corner of Trent Valley Road and Little Lake Roads.

The lots were severed for the purpose of obtaining building permits for residential houses. We are unaware if applications for building permits have been made. The lots have been excavated down approximately **40 feet** from the road. Some fill is piled on the retained Rural portion of the original plot.

We have been told by the Cramahe Township Building inspector that the MNR is investigating this occurrence as is Lower Trent Conservation Authority.

The Township has informed us that the owners of the subject lands and the lots have licenses and permission to excavate and store fill on the site of the Pit.

The Pit owners are not just storing this fill but actively using it to reclaim the southern area of the Pit that is under the water table. It seems that the intention was to fill the area where excavation below the water table occurred.

There has been no site plan provided to-date that would indicate where the Asphalt Plant would be constructed but the attached pictures suggest that fill and reinforcement walls were installed at the bottom of the Pit at the location of the future plant.



This picture shows the extensive build up of fill, rubble, trees and brush in the area where excavation of gravel went below the water table at the most southerly end of the Pit. The built up area is assumed to be the foundational area for the plant. This picture was taken **November 22, 2024** after a light Rain.



The Arrow indicates Crandall Road. The orange box indicates the Environmental Protected area.



This picture was **taken December 16, 2024** and shows the dumping of fill into the subject area next to the Environmental area. A closer look at the built-up area indicates the area was reinforced with materials to stabilize the foundation. Dump trucks and Quarry Trucks full of fill from two lots recently rezoned as RR and located on Little Lake Rd were brought in, piled and deposited into this area.



This picture was taken December 16, 2024 and shows the dumping of fill into the subject area next to the Environmental area.

Dump trucks and Quarry Trucks full of fill from a lots located on Little Lake Rd were brought in, piled and deposited into this area.

The water has resurfaced behind the built-up foundation.



This picture was taken December 26, 2024 and shows that the effort to fill in the subject area is simply displacing the persistent ground water. It also shows the proximity of two neighboring Farms. The Farm in the foreground has a house located about 66 meters above the floor of the "Pit". The house was built in 2005 and would be uninhabitable should the Asphalt plant be located on the subject lands.

New concerns about the fill, the number of trucks and the swiftness of the operation are being circulated making local residents more anxious. Lower Trent Conservation was called and a complaint lodged.



This picture Taken January 27<sup>th</sup> 2025 shows the depth of the excavation of the Rural Residential Lots on Little Lake Rd and Trent Vally Road. The depth of the excavation is approximately 40 ft. The sign seen at the top of the picture is at road level.



This picture Taken January 27<sup>th</sup> 2025 shows the depth of the excavation of the Rural Residential Lots on Little Lake Rd and Trent Vally Road. The depth of the excavation is approximately 40 ft. The sign seen at the top of the picture is at road level.



This picture Taken January 27<sup>th</sup> 2025 shows the depth of the excavation of the Rural Residential Lots on Little Lake Rd and Trent Vally Road and the stockpiled fill yet to be withdrawn.

## Conclusion

We are convinced that the proposed Asphalt Plant and its amendment to operate 24 hours a day in this specific location is an incompatible use that does not conform to the Township Official Plan, the Provincial Policy Statement or the Growth Plan For The GREATER GOLDEN HORSESHOE (GGH) 2024.

Existing or new plants, located in areas not as sensitive to Environmental concerns or in built up rural residential areas, may be a more appropriate and less disruptive solution.

I/We believe that our Objections are reasoned, thoughtful and objective. I/We ask that the Ministry withhold Approval of the Asphalt plant in this location and to withhold approval of 24 hour operation on the subject lands.

Yours Truly

---

**The Chair – The CRAA**

Cramahe Resident Advocate Association