

Opposition letter to

**the application from Carson's Supply to build
a concrete/PVC manufacturing facility
and, ultimately, a concrete batching plant
just outside the Southampton settlement area.**

I'm writing to oppose the application for three reasons:

(1) because potential air pollution issues have not been addressed,

(2) because the industrial facility poses noise and health issues for those living on adjacent properties and health issues for those using the two nearby golf courses and possibly for those in the Southampton settlement area,

and

(3) because the location of the industrial plant will create safety issues on the road network.

This opposition letter is organized around statements in the February 20, 2024, Bruce County Planning Report sent to Saugeen Shores council. My observations/objections to statements in that report are *identified in italics*, except for my conclusions at the end of the letter.

Purpose of the Facility

Currently, the intent is to build, at a new location, a concrete manufacturing plant for precast structures (such as septic holding tanks and electrical utility vaults), an activity Carson's Supply currently carries out at its location east of Highway 21 on the northern edge of Port Elgin.

In the future, Carson's Supply intends to expand the new plant to include a polyvinyl chloride (PVC) manufacturing facility (again, something they apparently also do at their current location). At some future date, Carson's Supply also intends, "through site-specific amendments", to apply for permission to construct a batching plant to make concrete by combining various ingredients onsite. (*Concrete is made using Portland cement, sand, gravel, fly ash, silica fume, slag, chemicals and possibly other ingredients*).

Observation: adding a batching plant would change the nature of the facility and intensify its impact on the surrounding areas. Since the location is intended to be used for three different activities, all three should be considered together in assessing Carson's application.

The Planning Report notes that "...batching plants are prohibited throughout the zoned area of the Town, either alone or in conjunction with other uses unless specifically listed as a

permitted use in a specific zone.” Batching plants are not listed in the Agricultural Commercial (AC2) zone.

Location

The proponent’s property is just outside the settlement area of Southampton. Indeed, the facility would be diagonally across from the southeast corner of Southampton (the east end of South Street where it intersects with Highway 21).

The proponent identified the following properties near the proposed site of the industrial facility:

- three single detached residential dwellings to the north (along and on the north side of Bruce Road 3);

- two golf clubs directly across Bruce Road 3 from the proponents property;
 - *South Port Golf Club and Saugeen Golf Club;*

- agricultural lands and “a mix of businesses and single, detached dwellings” across Highway 21 to the west;

Observations:

- *The agricultural lands west of Highway 21 belong to Hi-Berry Farm, a market garden business;*

- *The businesses (including Dales’s Carpentry) and single, detached dwellings, also west of Highway 21, are south of the agricultural fields;*

- *Not mentioned in the Planning Report, is a riding facility with horse stables and, across from that, single detached houses on the north side of South Street in a Southampton residential area called Eastgate. As noted earlier, these are diagonally across Highway 21 from the proponent’s property;*

- a church west and adjacent to the proponent’s property;
 - *South Port Pentecostal Church;*

- southwest of the proponent’s property, two dwellings, a nursery business and an auto repair business;

- *Everest nursery;*

- *Gingrich Service Centre;*

- and a single detached dwelling and three licensed aggregate extraction sites along Bruce Road 3, east of the proponent’s property;

Observations:

- Some of the properties listed above imply support for a new commercial use;

- The Planning Report is inconsistent as to the number of aggregate extraction sites, mentioning one extraction site on one page of the Report and three sites on another page. None are visible from Bruce Road 3.

Justification

The applicant states that the “partial relocation and expansion” of the business needs to occur in the Port Elgin area (near the current business).

It’s noted in the Planning Report that “ ... alternative locations have been evaluated and there are no reasonable alternative locations which avoid prime agricultural land or ... lower priority agricultural lands.” And that there are “... limited opportunities for space-extensive industries to locate in the settlement area ...”;

Observation: this statement offers justification for the selection of the property by Carson’s Supply within or near a settlement area.

The Planning Report notes that the proponent’s property occurs in an area that could, in the future, be re-designated from prime agricultural to rural in the Bruce County Official Plan. The implication is that re-designation as rural could potentially be less restrictive to non agricultural uses, depending on the extent of prime agricultural soil. But the Report noted that “... Carson’s Supply’s expansion timelines do not fit with waiting to see how these policies are eventually implemented.”

The Planning Report also notes that there is a projected shortfall in the urban area of Saugeen Shores of “vacant employment parcels” (i.e. empty property that would be suitable for businesses).

Observation: Since the concrete and PVC manufacturing facility and future concrete batching plant is expected to employ 50 people, the statement about the shortfall of “vacant employment parcels” clearly implies support for the proposal.

Impact

Emissions

The Planning Report notes that the proposed concrete batching plant and PVC manufacturing facility would be considered a Class II Industrial facility which may produce “... occasional outputs ... of fugitive emissions ...” as well as noise, odour, dust and/or vibration.

Observation: this statement is vague. The only other comment about possible emissions is a remark in the Planning Report in response to a concern communicated by a member of the public about dust/air pollution. In answering this concern, the Planning Report refers

to an engineering report which mentioned “oiling” the surface of the ground (probably using calcium chloride) to reduce the amount of dust going into the air. There was no discussion by the proponent in presentations to council about air-born dust and other possible atmospheric pollutants. And no government agency was asked for comments about air-born dust and emissions from concrete batching plants and PVC manufacturing. This is a serious omission.

Noise

The Planning Report notes that “... shift operations are permitted and there will be “... frequent movement of products and/or heavy trucks during daytime hours”

The Planning Report also states that traffic on Highway 21 is already a source of “... a significant amount of traffic-related noise ...”, as is noise from agricultural equipment.

These statements seem to dismiss, as a concern, noise produced by a concrete and PVC manufacturing facility and cement batching plant by mentioning that both highway noise and that generated by agricultural equipment in the area is already present. The Planning Report fails to note that agricultural equipment noise is intermittent, highway noise fluctuates, and the proposed industrial facility may produce different and higher noise levels from equipment moving materials in the plant area and into silos of the batching plant, diesel engines in vehicles, reverse warning sounds and possibly air brakes, noise that may begin early and end late, beyond a forty hour week because of shift operations.

Traffic and Safety

The Planning Report notes that a Transportation Impact Study concluded “... the area intersections are currently operating within acceptable levels ... and will continue ... at acceptable levels to the ten year study horizon”.

Observations:

- the statement of the traffic study misrepresents the situation;

- it is currently very difficult to make a left turn from Bruce Road 3 onto Highway 21 – a T-junction. This difficulty would be exacerbated by a significant increase in truck traffic using the road;

- an additional safety concern is that the Bruce Road 3 intersection with Highway 21 occurs near an S-shaped curve on the highway, shortly before a speed reduction northbound from 80 to 60 km/hr and a left turn lane onto South Street from the highway and, on the southbound lane, a speed increase at the South Street intersection from 60 to 80 km/hr; a lot going on in a short space and, altogether, creating a potentially dangerous driving “environment.”

- a single gravel lane into the proponent's property off Bruce Road 3, to be paved and used as an entry/exit road for the industrial facility, is directly opposite the property line between the South Port Golf Club and the Saugeen Golf Club. Thus, trucks transporting material to, and finished products out of, the facility would pass by the entrances to the two golf courses and also encounter vehicles with canoeists and kayakers driving to Saugeen River access #14, four kilometers east of the industrial facility's access road.

- truck traffic to and from the industrial facility is forecast to be "... 30 and 23 trips during the AM and PM peak hours" If this actually means 30 trucks in the AM and 23 trucks in the PM, as the wording suggests, this would imply six or seven trucks per hour during the day, assuming the facility transports raw materials into and ships products out of the site between 8:00 am and 5:00 pm;

- there would be increased car traffic on Bruce County Road 3 from the 50 employees working at the facility, exacerbating a safety issue.

Separation from Other Uses

The Planning Report notes that the "potential influence area ... (of a Class II Industrial facility) ... is 300 m ... where adverse effects may be experienced" and that the Provincial D-6 Guidelines recommends a minimum of 70 m between a Class II facility and a sensitive land use."

The applicant proposes to "... locate the buildings and outdoor storage areas a minimum of 87 m from the northern property line, 81 m from the western property line, 29 m to the southern property line ..." maintaining "... the minimum 70 m separation distance to the sensitive land uses to the north and west and the existing single detached dwelling on the subject lands."

Observation: From the conflicting statements above (if the "potential influence area" of 300 m is not a typo), it appears that the potential influence area of a Class II facility is much greater than that specified by the D-6 Guidelines and the proponent's intentions.

Mitigation

- landscaped berm 3.6 m high and 21.6 m wide;
- ~40 acres of farmland retained;
- woodlots;
- prior archaeological evaluation for "... lands having high ... potential."

Observation: the mitigation efforts (berm, farmland retained and woodlands) appear unlikely to make much difference, except visually, once all three functions of the industrial facility (concrete and PVC manufacturing and cement batching) are operational. It might be noted that while wooded areas on the proponent's property would screen the industrial facility to a certain extent from the north, the industrial facility would be highly visible from the west along Highway 21.

Conclusions

One of the arguments used to support the proposed concrete and PVC manufacturing facility and future concrete batching plant is the absence of available land that could be purchased near Carson's existing operation in Port Elgin. This is essentially an argument of convenience, considering the size of Bruce County as a whole. In fact, the site location for the proposed three-part industrial facility presents safety concerns because of the T-junction at the Highway 21/Bruce Road 3 intersection, the S-shaped curve on the highway, speed changes both northbound and southbound and the dedicated left turn lane onto South Street; as well as because of truck traffic on Bruce Road 3 which is used by golfers and canoeists and kayakers driving to access point #14 on the Saugeen River.

Another argument used to support the industrial facility is that it would create 50 new jobs. This is obviously an important benefit. But considering the safety issue (above) and possible air emissions (discussed below), it's important to ask whether the benefits outweigh the negative impacts of the facility, **AT THAT LOCATION**, for current residents and businesses in the area, as well as for the settlement area of Southampton which is just across the highway from the proposed facility.

A major shortcoming of the proposal for the industrial facility is not even addressed by the proponent or the Bruce Planning Report: air pollution. As noted, this was dismissed in the Planning Report and redirected as to how dust may, or may not, be treated on the surface of the ground. Batch plants emit particulate matter such as cement and sand dust and other pollutants. The emissions occur from "point sources" (for example, during the transport and mechanical transfer of materials to silos) and fugitive sources (for example, from wind blowing across storage piles and vehicle traffic moving around the plant). These and other air pollutants from the ingredients used in making concrete can have serious health effects. Indeed, the US studies I read in a quick look at the literature indicate that batch plants are among the highest polluting industries, more so than power plants and refineries (article in *Environmental Science Technology*, 57(31): 11410-11419, July 23, 2023 (<https://doi.org/10.1021/acs.est.3c04412>)).

There is no indication in the Planning Report how the proponent will manage emissions of particulate matter, how the production process of making concrete is regulated by the provincial government and how the proponent will meet those regulations. And until that is communicated to the public, the proponent's application must be regarded as incomplete and should not move forward.

The environmental impact of a concrete batch plant for public health (beginning with the people living near the facility and extending to those using nearby properties for recreation and living in the settlement area of Southampton), as well as commitments to monitor air quality and noise in an effective, ongoing way, deserve much more attention. Certainly as much as that concerning the agricultural land that the industrial facility will take out of production. Indeed, the most important priorities for assessing the application to build a concrete and PVC manufacturing facility and a batch plant, **at the location proposed**, should be safety and the

health of the community, followed by concerns for new employment and the removal of land from agriculture (despite being an urgent concern in a province undergoing rapid urban development).

This project **should be relocated** if the health and safety issues cannot be managed to **widespread public satisfaction**.

Peter L. Storck
Southampton
March 8, 2024