

**SUNROSE**



Sunrose Land Use Consulting  
Halifax, Nova Scotia

April 13, 2022

Thea Langille, MCIP LPP  
Principal Planner  
Rural Policy & Applications  
HRM

Dear Thea:

**RE: Ledwidge Lumber – MPS/LUB amendment to: re-zone lands (PIDs 40450934, 00382507) from R1-b to R-6 to align with the MPS that allows for the expansion of the Ledwidge Lumber forestry use at 195 Old Post Road, Enfield, NS (planning district 14 & 17); to carry out the MPS intent to clarify that “expansions” to existing forestry uses are permitted in the R-6 Zone; and to recognize woody biomass biofuel technology as a forestry use.**

On behalf of my Client, Ledwidge Lumber Company Limited, we are making an application to amend the Municipal Planning Strategy (MPS) and Land Use By-law (LUB) for Shubenacadie Lakes Plan Area (Planning Districts 14 & 17). The reason for the request is to re-zone adjacent lands to their existing forestry sawmill operation and improve the wording in the MPS/LUB to better align with current MPS preamble that allows for the expansion of the Ledwidge Lumber operation.

One of the two properties subject to the requested rezoning is designated Residential, while the other is partly designated Residential and partly designated Resource. The Residential designation does not have enabling policy to allow a rezoning from R1-b (suburban residential) to R-6 (Rural Residential) but the Resource Designation does (Policy P-181 and P-86). It appears that an MPS amendment is required to re-zone the subject properties from R1-b to R-6 whether the MPS designations are changed or not.

Given that an MPS amendment is required to enable the rezoning, we are also seeking to clarify sections of the MPS/LUB as necessary to carry out the intent that the Ledwidge Lumber operation is permitted to expand and that a woody biomass biofuel plant is considered to be a forestry use. The reason for this request is to avoid any confusion at the permitting stage if/when the re-zoning is approved.

The proposed re-zoning will not result in negatively impacting the availability of vacant lands for future residential development. There is a large volume of vacant lands in the plan area that are designated Residential. The subject lands are owned by Ledwidge Lumber and located between the existing sawmill and the Resource designation. There is no intent for these lands to ever be developed as R1-b residential subdivisions.

Ledwidge Lumber Company Limited is a family owned business located at 195 Old Post Road in Enfield and has been in operation nearly 80 years since 1943 when it was established by Laurie Ledwidge. At the age of 18, Laurie first began with a shingle mill where he sawed wood shingles for homes during the war. In 1948 he built a portable mill and had 12 employees. Through two rebuilds and a lot of good faith, Ledwidge Lumber has supported three generations of the Ledwidge family and currently employs over 120 people.

Eighty-five percent of the Company's workforce are in full-time, permanent positions. Besides production line and office staff, Ledwidge Lumber employs industrial mechanics, electricians, heavy equipment operators, foresters, and stationary engineers. Over 300 private woodland owners supply Ledwidge Lumber with roundwood to saw from all over the Maritimes.

Ledwidge Lumber manufactures top-quality lumber and by-products for delivery to the global marketplace. In addition to the production of lumber, they sell sawdust, wood chips, bark, and wood shavings (all forms of woody biomass) that get turned into high grade lumber products that are sold locally in Nova Scotia such as: paper products, landscaping, and animal bedding.

Ledwidge Lumber owns four properties which are contiguous to each other. Two of the four properties are zoned R-6 (Rural Residential) which is where the existing forestry sawmill operation is located. The other two properties are zoned R1-b (Suburban Residential). The MPS preamble specifically allows for the expansion of the Ledwidge Lumber operation which was a site specific MPS amendment initiated and approved by Halifax County Council in 1992. The MPS amendment intended to allow for all future expansions of the Ledwidge Lumber operation but neglected to anticipate the future need to expand onto adjacent properties.

The Ledwidge Lumber operation was located on the two R-6 zoned properties at that time in 1992. The operation has expanded onto one adjacent property without the owners realizing that the land was zoned R1-b rather than R-6. The owners had assumed that expansions to their operation was enabled and protected since 1992 when Halifax County Council, (on their own initiative), approved a site specific amendment to the MPS to allow for future expansions to the Ledwidge Lumber operation.

The Halifax County MPS amendment was done because, in 1991, Laurie Ledwidge had to apply for a development agreement to allow him to add a kiln to his operation. That effort concerned Halifax County Council because they wanted to protect the sawmill operation by allowing it to expand as-of-right and they didn't like the length of time for the processing of the development agreement (March 3, 1992 Council minutes). On August 22, 1992, Halifax County Council approved MPS/LUB amendments that were intended to "...make accommodation for the Ledwidge Lumber mill." The Council minutes from August 17, 1992 state that, "Staff was asked to make amendments to accommodate the expansion for this use by right particularly in recognition of the fact that this mill has preceded the plan and has been in existence prior to the plan".

It was recommended by staff to rezone the lands to R-6 (Rural Residential). However, because the R-6 zone did not permit expansion of lumber mills by right, staff recommended that the land use of "existing forestry uses" be added to the zone and to allow expansions as-of-right subject to the setback requirements for "resource uses" in the MR (Mixed Resource Zone). As quoted from staff

in the August 17, 1992 Council minutes: "For Mr. Ledwidge this would allow him to expand, by right, in the future".

However, the LUB wording of "existing forestry uses" is slightly different from the MPS preamble which clearly states that "the continued use and expansion of existing forestry uses..." are to be permitted for the Ledwidge Lumber operation. This wording could be interpreted as being limited to the existing operation since the word "expansions" is not included. With the proposed re-zoning, we are seeking clarity on this matter so that "expansions to existing forestry uses" is made clear.

The forestry industry is adapting to the changing market and world circumstances which includes the need for enhanced woody biomass management such as new technologies for converting woody biomass residues into clean energy that can help reduce local and global GHG emissions by replacing fossil fuels with biomass based fuels. One of the new technologies for woody biomass residues are low carbon biofuel operations. Biofuel operations generate very little noise and their main discharge is water vapour from the wood drying process. It essentially uses heat to reduce the woody biomass into a liquid. The noise, odour and emissions are similar to the existing sawmill operation.

These low carbon biofuel land uses are ideally located within close proximity to sawmills so that they do not have to transport the woody biomass from one location to another. Ledwidge Lumber are currently in talks with a biofuel plant operator who wants to locate in Nova Scotia and is seeking support and possible funding from the Provincial and Federal levels of government. Having a biofuel operation on the existing Ledwidge site to transform by-products is a positive green solution to help address the climate crisis.

The land area necessary for the biofuel operation is smaller in size than the land area used by the existing sawmill. The buildings for the biofuel operation are similar in size to the existing sawmill buildings in terms of area and height. (see attached site plan and cross section elevation drawings). The proposed buildings will be set deep into the Ledwidge properties, surrounded by mature trees, and far away from roads and surrounding land uses.

The re-zoning will allow for the company to invest in its future by adding value to its current processes. A number of recent investments of updating the current facility's technology and efficiencies means carbon neutral solutions for by-products. A biofuel operation, for example, aids Nova Scotia in not only creating markets for lower grade wood products but also in its goal to remove our reliance on fossil fuels. Nova Scotia's future bio-economy will be key in creating carbon neutral or even carbon negative energy. Ledwidge Lumber is planning to be a part of this shift.

As part of this MPS amendment process to re-zone the two adjacent properties and to clarify that "expansions of" the Ledwidge Lumber forestry use in the R-6 zone is permitted, we are also requesting that the MPS preamble or LUB forestry definition be updated to recognize that woody biomass technology is a forestry use that is supportive to sawmills.

With the fourth generation of the Ledwidge family soon to be of employable age, and a high degree of investment in the sawmill operation during 2021/2022, Ledwidge Lumber is a forward thinking company that is here to stay as an economic driver in Nova Scotia.

We are asking that HRM please give this application a priority status because it is essentially a "housekeeping" amendment that aligns with the existing MPS preamble that enables expansions to the existing Ledwidge Lumber forestry land use and so that this leading biofuel operation for Nova Scotia will not be delayed.

As per your request, I have enclosed an aerial site plan and associated cross sections that illustrate the visual relationship of the biofuel structures to the existing sawmill structures. I have also enclosed a Transportation Impact Review which concludes that the road network can accommodate the proposal. I have also enclosed 11 letters of support, an assessment of anticipated job opportunities, and an assessment of the expected socio-economic benefits.

I look forward to working with you on this very important application.

Sincerely:



Jennifer Tsang, MCIP

cc: Councillor Cathy Deagle Gammon

Enclosures:

1. Cross section plan by Strum
2. Aerial photo site plan by Strum
3. MPS amendment application
4. Transportation Impact Analysis from Trans4m Group
5. Vyterra letter of support
6. Deputy Minister of Nova Scotia for Natural Resources and Renewables letter of support
7. CKF Inc. letter of support (recyclable and compostable tableware and food packaging)
8. NSCC letter of support
9. Verschuren Centre letter of support
10. NSIH letter of support for the project site
11. NSIH letter of support for Clean Fuel Fund Initiative
12. NSIH letter of funding support
13. NSCC letter of intent to purchase fuel
14. Nova Scotia Ministry of Finance letter per-approving eligibility for refundable Provincial tax credits
15. Elbow River Marketing letter of interest in purchasing clean fuel
16. Assessment of the expected jobs to be created
17. Assessment of the expected socio-economic benefits
18. Application Fee has previously been submitted to HRM