



August 6, 2021

Ministry of the Environment, Conservation and Parks - Environmental Policy Branch  
40 St Clair Ave West, 10<sup>th</sup> Floor  
Toronto, ON M4V 1M2

**Re: Environmental Registry of Ontario Posting 019-2785  
Draft Land Use Compatibility Guideline**

---

The Remington Group owns lands at 5200 Harvester Road in the City of Burlington. These lands are designated as General Employment in the City's Official Plan and are zoned as General Employment in the City's Zoning By-law. The lands are also located within a Provincially Significant Employment Zone (PSEZ) as well as the City's Appleby GO Major Transit Station Area (MTSA) as identified by the Region of Halton's Regional Official Plan Amendment 48, which was adopted by Council on July 7, 2021. The land use policies and zoning provisions for these lands currently permit a wide range of employment uses.

Recognizing that these lands are located within a MTSA and that provincial policies contained in *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* direct population and employment intensification to these areas, we anticipate that development proposals to introduce sensitive land uses on adjacent lands will be forthcoming. While supportive of provincial policy direction to align transit investment with population and employment growth around MTSA's, we would like to ensure that the proposed Draft Land Use Compatibility Guideline also balances the Province's objective of protecting strategically located employment land through its PSEZ designation. Specifically, we are concerned with the vague language included in the draft guidelines around development permissions with Minimum Separation Distances (MSDs) with some interpretations being that no development would be permitted in MSDs. If this is the case, with the introduction of sensitive land uses on adjacent properties, the proposed guidelines will limit the as of right land use permissions for these lands that not only support job creation but also MTSA objectives. In this regard, we ask that the Ministry clarify development permissions within MSDs to avoid unintended and inconsistent interpretations and in doing so recognize that, especially within intensification areas such as MTSA's, the final guidelines need to be flexible in order to support multiple provincial objectives, including protection of employment lands.

We thank you for the opportunity to provide these comments. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Emma Barron, MCIP, RPP  
Project Manager, Land Division  
The Remington Group  
905-761-8200 ext 2258