



July 3, 2021

Sanjay Coelho
Ministry of the Environment, Conservation and Parks
Environmental Policy Branch
40 St Clair Avenue West, 10th Floor
Toronto, ON M4V1M2

Re: ERO Posting # 019-2785: Land Use Compatibility Guidelines

Concrete Ontario is pleased to offer comments on Land Use Compatibility Guidelines.

Concrete Ontario is the voice and resource of concrete and construction industries across Ontario. Representing over 96% of all concrete production and manufacturing, Concrete Ontario brings education, technologies, research, and innovation to architects, designers, contractors, and concrete companies.

Across Ontario, there are 285 ready mixed concrete plants located in virtually every constituency. Cement and concrete are vital participants in Ontario's economy, contributing to 54,000 direct and indirect jobs across the province and generating over \$25 billion in direct, indirect, and induced economic activity.

While we are supportive of the Ministry's intention to update several D-series guidelines for municipalities to use when making land use planning decisions to ensure that land uses can co-exist and avoid any impacts of conflicting land uses, we would like to highlight a key area of concern for the ready mix concrete industry.

As a major industry in the province we are concerned that we weren't consulted in advance of these proposed changes as it relates to ready mix specifically. In the proposed guideline the ready mix concrete industry has a proposed MSD of 100 and an AOI of 250 and is labeled as Class 1. However, as a group, Class 1 has an MSD of 200 and an AOI of 500M. We would like to better understand the rationale why ready mix has a proposed MSD and AOI half of what is proposed for Class 1. At the very least, we believe that ready mix should be classified as full Class 1. As it currently is proposed we feel that the current classification disproportionately impacts concrete facilities.

We are also concerned that the definition of sensitive land in the document continues to push what may be considered sensitive. While we agree that under this definition residential buildings are clearly sensitive, the document highlights other sensitive land uses "that could also include various commercial, retail, institutional, and office uses". Pushing the definition into some of these new areas (ie. if it could include another industrial facility) of what is considered sensitive could have a negative impact on where we are able to locate any new facilities, particularly with the MSD and AOI's currently proposed.

We therefore **request to meet with you** at your earliest convenience to better understand what is proposed for the ready mix concrete industry. We thank you for the opportunity to comment.

Sincerely,



Bart Kanters, President
Concrete Ontario