



Principals

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July 3, 2021

**GWD File:
13.1915.00 MECP**

**Ministry of the Environment, Conservation and Parks
Environmental Policy Branch
40 St Clair Avenue West, Floor 10
City of Toronto, Ontario
M4V1M2**

Attention: Mr. Sanjay Coelho, Senior Policy Analyst

**Subject: Updated Land Use Compatibility Guideline
ERO Number 019-2785**

Dear Sanjay:

Gagnon Walker Domes Ltd. (GWD) acts as Planning Consultant to Maple Lodge Farms Ltd. (MLF) and its affiliated companies, who own properties totaling approximately 366 hectares (904 acres), located on both the east and west sides of Winston Churchill Boulevard, north of Steeles Avenue in the City of Brampton and Town of Halton Hills.

The MLF properties consist of a broad range of features; including, a Processing Plant, a Retail Outlet Store, a Water Pollution Control Plant, as well as fields on which commodity grains are farmed. At any given time some 1,800 to 2,000 individuals are employed on-site by MLF. It is one of the largest independently owned poultry processors in Canada, exporting products across the globe. According to City of Brampton Economic Development indicators, MLF is ranked #2 in Manufacturing Employers and #4 in Top Employers.

Lands situated within the City of Brampton are predominately planned and designated for industrial land use. Similarly lands within the Town of Halton Hills are designated employment and/or are located within future strategic employment lands. Over the last two decades both municipalities have experienced significant growth. Greenfield development in the form of industrial warehousing, commercial centres, and residential plans of subdivision are now in close proximity to MLF landholdings.

Updated Land Use Compatibility Guideline

MLF appreciates the Ministry of Environment, Conservation and Parks (MECP) invitation to comment on the Updated Land Use Compatibility Guideline (the "Guideline"). It is excited about the prospect of a new Guideline that will help municipalities and planning authorities plan for major facilities and sensitive land uses.

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Having a clear Guideline that protects existing or planned employment areas and facilities is encouraging. MLF has secured a copy of the Guideline (March 2021). Additional submissions or requests for information may be forthcoming once its Consultant Team has completed its review. MLF has contacted the Planning Departments of Brampton and Halton Hills seeking further consultation.

According to Table 1: Area of influence and minimum separation distance for select major facilities, MLF's Processing Plant (**Appendix 1**), would be classified as a Class 4 Facility. Its Area of Influence (AOI) would measure 1,500 metres (4,921 feet) and its Minimum Separation Distance (MSD) would measure 500 metres (1,640 feet).

According to Table 2: Area of influence and minimum separation distance for classes of major facilities, a Class 4 facility is defined as an operation with significant adverse effects that may be difficult to mitigate. They may include larger outdoor operations.

At present there are a number of active development applications currently under review with the City of Brampton which fall within the MLF AOI. Similarly there are current planning exercises underway within the Town of Halton Hills. It is understood there will be no transition for applications that are currently under review or appeal such that, once the Guidelines are adopted, they will apply to all land use decisions made after that time.

The Ministry's decision on July 2, 2021 to extend the Guideline's comment period for an additional 34 days (August 6, 2021) while appreciated is expected to be insufficient. Given the importance of the Guideline ample time is required to fully understand its wide ranging implications and what it means for major facilities like MLF.

MLF reserves the right to provide further comments as necessary during the comment period. It welcomes the opportunity to meet with MECP Staff. Kindly accept this letter as our request to be added to the Guideline notification list.

Should you have any questions, please contact the undersigned.

Yours truly,

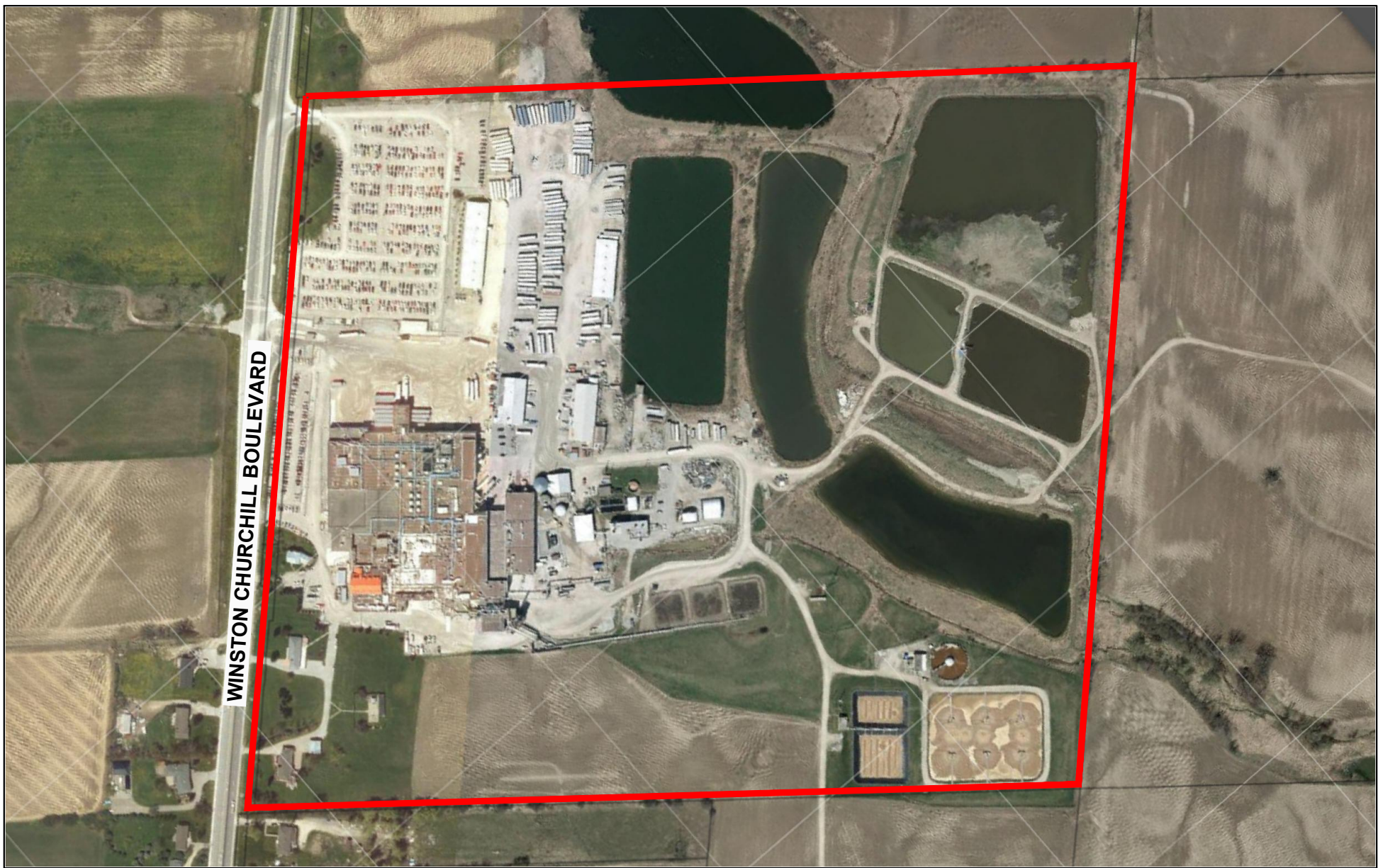
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c.c. **Maple Lodge Farms Ltd.**
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APPENDIX 1



AIR PHOTO - SUBJECT SITE
8301 WINSTON CHURCHILL BOULEVARD
CITY of BRAMPTON
REGION of PEEL

LEGEND

 **SUBJECT SITE**

P.N.: 13.1915

Date: May 2, 2019

Scale: N.T.S

Revised:

Drawn By: D.S.

File No.: PN 1915_ Aerial_Images



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Brampton Operations

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Cogeneration Plant





Wastewater Treatment Plant

