



PLANNING AND URBAN DESIGN

4 August 2023

Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th Floor  
Toronto, Ontario M7A 2J3

Dear Sirs/Mesdames:

**RE: ERO Item 019-6813**  
**Review of proposed policies adapted from A Place to Grow**  
**and Provincial Policy Statement to form a new Provincial**  
**Planning Policy Instrument**  
**Mother Parker's Tea & Coffee Inc.**  
**Comment Submission**  
Our File: 17.630

We are the planning consultants for Mother Parker's Tea & Coffee Inc. ("Mother Parkers") the owner of 2530 and 2531 Stanfield Road and the occupant of 2470 Stanfield Road (the "Subject Properties"), where it manufactures tea and coffee products. Mother Parkers uses the services and premises of numerous businesses located within the same existing *Employment Area*. Its finished products and raw materials are further warehoused in various properties throughout that *Employment Area*. Notably, Mother Parkers was a recent recipient of a \$5 million investment from the Ontario government's Ministry of Economic Development and Trade in support of Mother Parkers' latest expansion into cold coffee and tea extracts. The provincial government's support was based on a \$33.4 million investment by Mother Parkers to boost local manufacturing and create new jobs.

The purpose of this letter is to recommend that the Minister of Municipal Affairs and Housing consider modifications to the proposed policies contained in the Provincial Planning Statement, 2023, with respect to providing additional policy direction to protect "large employers" and improve land use compatibility criteria between *Employment Areas* and sensitive uses.

Mother Parkers is a local business that employs between 800 and 900 employees. The vast majority of those employees work in Mississauga and Mother Parkers' operations support many other businesses and suppliers located within the *Dixie Employment Area*. The Mississauga Official Plan is structured by providing higher-level policies for the entire *Employment Area* designation, in addition to providing specific land use designations for the properties located within the *Employment Area*. The Subject Properties are designated within the *Dixie Employment Area* and are specifically designated *Business Employment* (as identified on Schedule 10 – Land Use Designations of the Mississauga Official Plan).

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The *Dixie Employment Area* includes a collection of properties located along the south side of Dundas Street East, located between Haines Road to the west and Ernest Blundell Drive, which are designated *Mixed Use* as per the Mississauga Official Plan, which explicitly do not permit residential uses (the “Mixed Use Lands”). Presently, Mother Parkers only needs to concern itself with meeting Provincial compatibility standards as they affect residential uses located on the north side of the Dundas Street corridor. Please refer to **Figure 1** for an aerial image of the Subject Properties and the Mixed Use Lands.

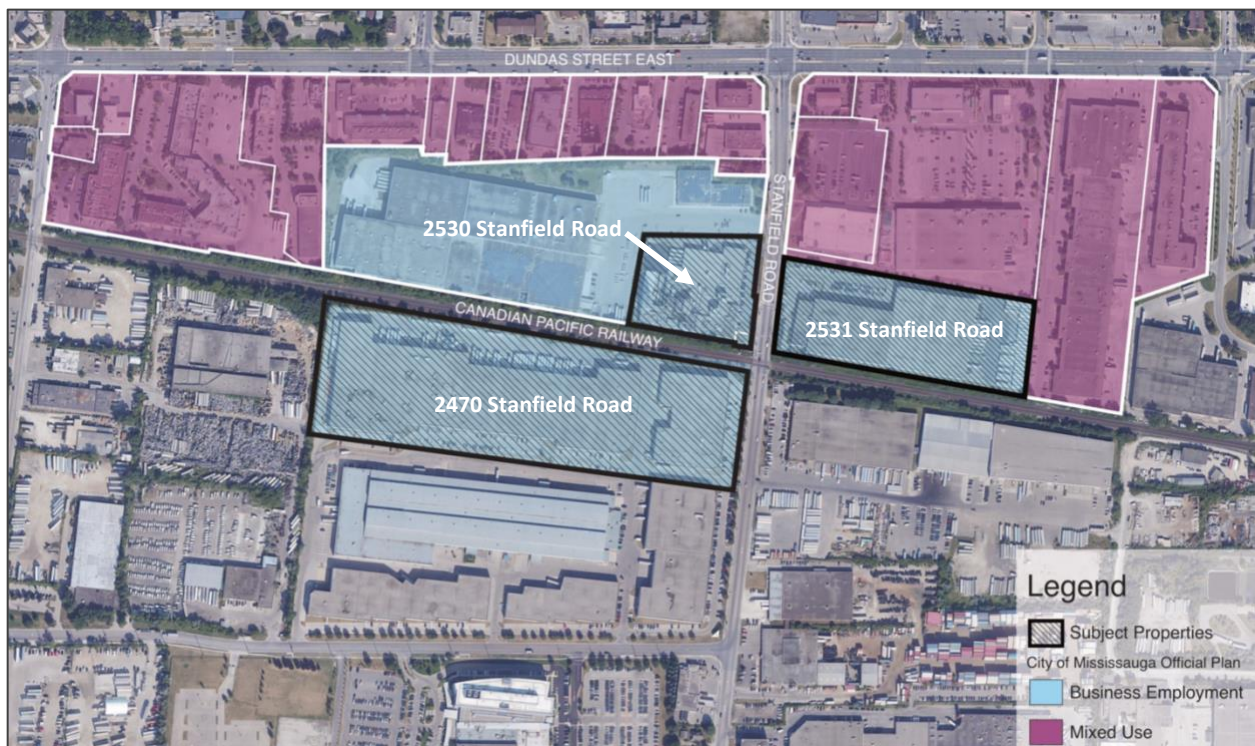


Figure 1 – Aerial image of the Subject Properties at 2470, 2530 and 2531 Stanfield Road and the Mixed Use Lands

On 6 April 2023 the Province of Ontario released a new proposed planning document known as the Provincial Planning Statement (2023) (the “2023 PPS”), which would serve as a new comprehensive Province-wide land use planning document that would replace the existing Provincial Policy Statement (2020) (the “2020 PPS”) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) (the “2019 Growth Plan”).

Specifically, Section 2.8.2 of the 2023 PPS contains the proposed *Employment Areas* policies, of which Policy 2.8.2(2) provides direction on the permitted and prohibited types of uses in *Employment Areas*, and on transition to non-employment areas to ensure land use compatibility: “*Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:*

- a) *planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
- b) *prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
- c) *prohibiting retail and office uses that are not associated with the primary employment use;*
- d) *prohibiting other sensitive land uses that are not ancillary to the primary employment use; and*
- e) *including an appropriate transition to adjacent non-employment areas to ensure land use compatibility."*

We believe that the policy section should be strengthened by recognizing large-scale industrial and manufacturing facilities, such as Mother Parkers, as "large employers" which contribute towards Mississauga's diversified economic base by generating a significant supply and mix of local employment opportunities. Particularly, in the case of Mother Parkers, as one of the largest coffee companies in North America, they actively work with over two hundred (200) Mississauga businesses, comprising of suppliers, services, and logistics providers, including businesses and properties in the *Dixie Employment Area*. When considering the scale and economic contribution of Mother Parkers, and other large-scale industrial and manufacturing facilities, this significantly warrants the incorporation of additional policy which protects their current and future operations, while supporting their role as significant contributors towards the economic diversity and prosperity of the Province.

By providing a greater distinction in the 2023 PPS for "large employers", this offers existing and planned businesses with the continued protection and long-term prosperity in *Employment Areas*, with the flexibility to adapt to economic needs, as market demands evolve. Therefore, we propose that the above policy section 2.8.2(2) be amended by including the following subsection (f): "*Planning authorities shall designate, protect and plan for all employment areas in settlement areas by: [...]*

- f) *planning for the long-term function and economic viability of large employers located in employment areas, which are industrial and manufacturing facilities that provide 100 or more local jobs, by prohibiting the introduction of sensitive land uses near their operations which would detract from their function and/or ability to accommodate new processes and changes in their operations;"*

Furthermore, Section 3.5 of the 2023 PPS contains the proposed Land Use Compatibility policies. The 2023 PPS is proposed to remove a series of pre-conditions which are contained in the 2020 PPS and are required to be evaluated prior to permitting the introduction of residential or sensitive land uses nearby industrial, manufacturing, or other uses that are vulnerable to encroachment.

Currently, draft Policy 3.5.2 in the 2023 PPS, reads as follows:

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2. *“Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that proposed adjacent sensitive land uses are only permitted if potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.”*

Based on the emerging direction in the Proposed PPS, as the draft policies reduce the criteria which municipalities would use to evaluate applications proposing the introduction of residential (sensitive) land uses nearby existing or planned industrial or manufacturing facilities, this presents an immediate risk of incompatibility arising between uses, which directly threatens the long-term viability of existing and planned compatibility-dependent facilities which are only permitted to operate within *Employment Areas*. The proposed removal of the pre-conditions is of concern to Mother Parkers, whereby should residential or sensitive land uses be introduced nearby Mother Parkers' facilities, such uses would no longer be required to be evaluated based on their identified need, the consideration of other reasonable alternative locations, or requirement to minimize and their adverse effects on compatibility-dependent uses.

Should residential or sensitive land uses be located within the *Dixie Employment Area*, Mother Parkers, may be unable to meet the required Provincial compatibility guidelines, restricting Mother Parkers' current operations and furthermore limiting Mother Parkers' opportunities to accommodate future process changes and alterations to their operations. Particularly, any restrictions which would prevent Mother Parkers from meeting the required Provincial compatibility guidelines would also threaten the supply of local employment opportunities provided by Mother Parkers' and may further impact the economic function of local suppliers, services, and logistics providers which are dependent on Mother Parkers' operations.

We would request that subsections (a)-(d) of Policy 1.2.6.2 of the current 2020 PPS, containing the compatibility criteria which are used to evaluate applications with adverse impacts on *Employment Areas* be re-incorporated as part of the 2023 PPS, to strengthen the protection and long-term viability of existing and planned compatibility-dependent industrial and manufacturing facilities. We would therefore request that Policy 3.5.2 of the 2023 PPS be revised to read as follows:

2. *“Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that proposed adjacent sensitive land uses are only permitted if the potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures, and the following criteria are met:*
  - a. *there is an identified need for the proposed use;*

- b. alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;*
- c. adverse effects to the proposed sensitive land use are minimized and mitigated; and*
- d. potential impacts to industrial, manufacturing or other uses are minimized and mitigated."*

Currently, Mother Parkers only needs to concern itself with meeting Provincial compatibility standards as they affect residential uses on the north side of Dundas Street East, which are over 210 metres away. Mother Parkers' current operations are carefully designed to limit noise on those residential properties north of Dundas Street East, with the majority of its noise impacts affecting lands which are not currently residential and are located within the *Dixie Employment Area*. The Mixed Use Lands presently function as a transition and buffer between the Subject Properties and the residential uses located on the north side of the Dundas Street corridor.

If the Mixed Use Lands adjacent to Mother Parkers were to be removed from the *Employment Area*, almost two-thirds of that distance is eliminated, with the closest lands permitting residential (sensitive) uses being only 75-80 metres away. That is a dramatic reduction in the distance over which noise and odour can dissipate. The introduction of sensitive land uses along the Dundas Street corridor will adversely impact Mother Parkers' operations, including its expansion and process change options, as Mother Parkers is required to meet the Provincial standards under all relevant compatibility guidelines, including the Ministry of Environment, Conservation and Parks (MECP) Publication NPC-300. Should new residential development restrict Mother Parkers' facilities to its current methods and volumes of operation, Mother Parkers may fall behind the rest of the industry and may need to abandon its Mississauga facilities.

The Provincial emphasis on creating jobs in manufacturing is clearly applicable to Mother Parkers' operations in Mississauga. It was the recent recipient of a \$5 million investment from the Ontario government's Ministry of Economic Development and Trade through the Advanced Manufacturing and Innovation Competitiveness program. The investment is supporting Mother Parkers' latest expansion into cold coffee and tea extracts. The provincial government's support was based on a \$33.4 million investment by Mother Parkers to boost local manufacturing and create new jobs. Those jobs, Mother Parkers' investment and the Province's investment are thus at stake.

We respectfully request that the Proposed PPS establishes both additional policy direction to protect "large employers" and improve land use compatibility criteria between *Employment Areas* and sensitive uses. By recognizing the need to protect "large employers", including Mother Parkers and other large-scale industrial and manufacturing facilities, it ensures their current operations, and future expansions and process changes are protected from the encroachment of sensitive land uses, protecting their long-term function as major employers and contributors to a robust local and regional economic base.

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Moreover, it is of critical importance that the 2023 PPS retains the pre-conditions which are contained in the 2020 PPS which are used to assess land use compatibility, to ensure that municipalities can undertake a thorough evaluation and gain an informed understanding of the unique site and area-specific conditions, and exercise the necessary precautions in situations where conflicts in land use compatibility may arise from the introduction of residential (sensitive) land uses.

We would be pleased to address further comments or questions should they arise upon review of this comment submission and prior to any Decision on the Proposed PPS.

Yours very truly,

**WND associates**  
planning + urban design

A handwritten signature in black ink, appearing to read "A Ferancik".

Andrew Ferancik, MCIP, RPP  
Principal