



## EMSHIH DEVELOPMENTS INC.

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January 8, 2026

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City of Burlington  
426 Brant Street  
Burlington, ON L7R 3Z6

Attention: Jo-Anne Rudy, City Clerk

### **RE: Committee of the Whole – Development & Growth Management**

#### **Statutory Public Meeting: City-Initiated Proposed Official Plan Amendment for Employment Area (DGM-01-26)**

Dear Madame Chair and Members of the Committee,

Please accept this letter as a written submission from Emshih Developments Inc. (Emshih) as it relates to Official Plan Amendment 7 (OPA 7). Properties affected by OPA 7 include 901 Guelph Line and 501 North Service Road.

We understand that the City of Burlington is proposing an Official Plan Amendment to the Burlington Official Plan, 2020 and Regional Official Plan, 1995, regarding updated policies to align with the recently updated Provincial Planning Statement, 2024 related to Employment Areas. Emshih is pleased to have the opportunity to work closely with staff through the public engagement process and have had the opportunity to discuss our concerns with staff.

This letter summarizes Emshih's comments and concerns regarding the implications of the PPS 2024 updated definition for Employment Areas on the City of Burlington's employment areas and related policy framework.

- Concern that proposed updates will limit Burlington's competitiveness with new employment attraction and growth
- Employment lands will be limited to manufacturing and warehousing; according to Statistics Canada, manufacturing accounts for approximately 10% of the employment industry in the region
- Limitation on permitted uses will freeze lands from other office and service-related employment uses which make up a larger portion of the employment industry
- Limitation on permitted uses may also constrain existing "non-confirming" uses from expansion; it is unknown if expansions of existing uses will become prohibited as a result of updates to the policy framework

- There are no large swaths of land to support larger scale manufacturing and warehousing uses
- Many lands within the employment area are fragmented or limited by existing sensitive uses (encroach within 300m setback per D6 guidelines etc.) therefore will not be able to support the permitted uses
- Prohibited uses (office, commercial and retail not associated with manufacturing and warehousing) will be directed to mixed-use areas where land is much more expensive; land is fragmented and more difficult to assemble and less financially feasible to development for employment uses

Emshih strongly recommends that Committee and Council consider the implications of the proposed updates to the City of Burlington's employment lands policy framework through proposed OPA 7 and defer approval until more information is available. Staff should work closely with the Burlington Economic Development Corporation and other stakeholders that will be impacted by the proposed changes to the employment areas. The growth and prosperity of Burlington's employment lands will be greatly at stake.

We look forward to continued collaboration amongst the City of Burlington and stakeholders.

Sincerely,

Emshih Developments Inc.

