

By email teycc@toronto.ca

30 April 2018
10P20

Chair and Members
Toronto & East York Community Council
City of Toronto,
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Sir/Madam,

**RE: 309 Cherry Street- Castlepoint Numa Zoning Amendment Application;
Comments on behalf of Lafarge Canada Inc.;**
Lafarge Cement Terminal, 54 Polson Street (“Cement Terminal”);
Lafarge Concrete and Aggregate Depot, 535 Commissioners Street.

I am writing on behalf of Lafarge Canada Inc. (“**Lafarge**”) to provide comments on the application by Castlepoint Numa (“**the Applicant**”) at 309 Cherry Street (“**Subject Lands**”). The undersigned attended the community consultation meeting on April 16 and provided oral comments. These comments are in addition to those provided at the Community Consultation meeting.

Lafarge owns the lands at 54 Polson Street, at which it operates a Cement Terminal (“**Cement Terminal**”) which distributes cement throughout the Toronto area. Lafarge also operates a Concrete Batching and Aggregate Depot at 535 Commissioner Street, which is leased from the Toronto Port Authority (land) and TEDCO (dock wall). Both facilities depend upon road access and water/dock wall access to ship its products. The Cement Terminal is located south of, and in proximity to, the subject lands.

Application is Premature

The Subject Lands are subject to flood risk and require full flood protection prior to development. The Subject Lands are designated *Port Industrial District* in the former City of Toronto Official Plan which remains in force. The application cannot proceed until the

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Central Waterfront Secondary Plan is approved, which Plan requires flood protection and precinct planning, among other matters. City staff indicate that the application is substantially inconsistent with both the Port Lands Planning Initiative and the Villiers Island Precinct Plan. As such, the Application is premature until these matters have been addressed.

Application and Staff Report fail to address land use compatibility with Lafarge

The Castlepoint application raises a serious concern for Lafarge, that is, the Application (and studies in support) fails to adequately recognize, analyze and address the issue of compatibility between the Proposal's sensitive residential uses and the existing industrial operations of Lafarge.

The noise and vibration study¹ submitted in support of the application is incomplete, as it provides no assessment of Lafarge, indicating that, *"a separate assessment of the Lafarge facility is warranted to determine projected impacts on the proposed development"*. The noise assessment of the Lafarge facility recommended by Castlepoint's own consultant has not been done. In our view, this renders the application incomplete.

Further, the preliminary staff report dated March 17, 2017 fails to adequately identify the issues of land use compatibility with the Lafarge facility as an issue in this application.

Truck access to Port/ Industrial uses

Lafarge continues to be extremely concerned that provision has not been made for truck transportation routes to access the Lafarge sites, together with other Port/ industrial sites in the Portlands. There are potential safety and operational issues that may arise from the mixing of a significant amount of industrial truck traffic with residential vehicular and pedestrian traffic. The City has advised that it will be undertaking a Port Lands truck management study which must identify appropriate

¹ Noise & Vibration Feasibility Study 309 Cherry Street, Phase 2, City of Toronto, HGC Engineering January 13, 2017.

truck routes and how these conflicts will be handled in a manner that will not negatively impact existing industries. However, it is our understanding that this study has not been completed. Transportation issues must be addressed both during construction and also in the long term. Until this matter is addressed fully, the Castlepoint application is, in our view, premature.

Until the matters raised in this letter are appropriately addressed, and in particular the Castlepoint application ensures land use compatibility through appropriate noise, traffic and dust studies, Lafarge objects to the approval of the application.

We appreciate the opportunity to address Community Council and look forward to continuing to work with the City and Waterfront Toronto.

Yours very truly,



Paul E. Johnston, MCIP, RPP
Principal
Johnston Litavski

cc: Lafarge Canada Inc. Mary Bull, Wood Bull; Stew Elkins, Paradigm; Daniel Woolfson/ Anthony Kittle, City Planning