

September 13, 2019

**Councilor Gord Perks,
Chair and Members of the Toronto & East York Community Council,
2nd floor, West Tower, City Hall
100 Queen St. W.,
Toronto, ON M5H 2N2
email: teycc@toronto.ca**

Attn: Ms. Ellen Devlin

RE: Port Lands Zoning Review Study

My name is Colin Evans and I am the Director of Lands and Environment for CBM Ready Mix. CBM is a major concrete producer throughout the province with 5 plants in Toronto.

I am writing today in regards to the zoning changes proposed for East Port, where the CBM Portlands plant is located at 651 Commissioners St.

I have been involved with this process for a while now and attended many sessions and had the opportunity to discuss my issues with staff. I would like to thank everyone very much for all the opportunities to provide input into these changes.

Overall I have been satisfied with the proposed zoning changes as the zoning is being updated and would take into account our operation for the first time. I think it is very important that industries such as ours are recognized. Concrete builds and maintains the city and has to be located close to where it is needed. The Portlands is an excellent location to feed the demands of the city so I must stress the importance of continuing to have these uses in this area. There have been other processes and discussions where other uses for the Portlands have been proposed that simply would not be compatible with industries such as ours and I must ask that any future discussions or considerations of the Portlands take into account the industries that are there and their importance to the city.

During this process there have been a few items that were presented that caused me concern. I should say that I discussed these with Anthony Kittel and felt reassured that our operations would be ok. However, I would like to detail these items for the committee so that they are considered and on the record. As we are an existing operation I realize that these changes would only be applied if we have to go through the site plan process but at CBM we are continually improving our operations and I am concerned that a future change may trigger some of these new requirements that our site simply would not be able to meet.

The first relates to no parking in the front yard. I understand from your staff that this will not be applied to existing sites however I am concerned that any expansion or improvements to the plant may trigger this requirement. As our operations are conducted in the rear of the plant and these operations require the movement of heavy equipment all employee parking must take place at the front of the plant. This is a safety feature to ensure that cars are not travelling amongst the heavy equipment. As I said, I am concerned that at one point this may be applied to us and it will not work for our operation.

Anthony and I discussed this and he told me that “The Zoning Bylaw Amendment parking provisions will apply to new development applications, not existing operations. If you do submit a development application to expand your operation, we have included a provision that will protect your existing parking supply”.

However, I am concerned that if we improve the plant and trigger a site plan change our parking requirements may change. The size and operations of our site simply will not support a change in the requirement for parking.

The second point in regards to parking are the number of spots required. I am not as well versed in this requirement and do not have the relevant data but I believe this is based on office floor space. As you know a Ready Mix Plant is mostly equipment and process and has very little office so I am unsure if this applied to us would cause us to have few or many parking spaces required.

Again, I discussed this with Anthony and he said “The parking supply minimum and maximum only applies to visitor and employee parking. The by-law amendment does not address equipment parking and therefore there is not a requirement work vehicle or equipment storage. “

However, my concern relates to the number of spaces that are required. Our operation size simply will not support an increased number of spaces.

I have had several conversations with Toronto staff regarding the open storage and it being possibly required in a “building”. This appears to have been changed to an “opaque barrier” but I am not clear on what this entails. Our piles are at the back of our operation, they are contained by concrete block walls. Typically all you can see are the open side for loader access and the top of the piles that are higher than the walls. However, as I stated they are at the back so cannot be seen from the street. They are blocked by the plant and by a large wall that runs down the front of our property.

I am concerned that the wording of this change may not allow our current pile set up though it surpasses the intent of the change. Anthony wrote that “We have quite a few comments about open storage visual barriers and have further clarified the requirement, which is intended to provide a visual buffer from the street or public realm. We have also included a provision where the visual barrier only surrounds the open storage (such as a retaining wall) and not the entire property.”

The CBM Portlands Plants piles cannot be seen from the street.

Just this morning I had a further discussion with City planning staff who stated that if the site plan requirement did trigger these changes to be applied to our plant and CBM was unable to meet them then it could be sorted out at Committee of Adjustment where site specific issues could be addressed. Therefore, I thought it important to put these concerns to paper now for future reference.

Thank you very much for allowing CBM to provide comment on this zoning change and I would like to compliment the Toronto planning staff on their professionalism and assistance throughout this process.

Sincerely,



Colin Evans

Votorantim Cimentos

VCNA | Director, Lands and Environment

Lands -Ready Mix and Cement

Environment- CBM

Cobourg Office

colin.evans@vcimentos.com

Mobile: (905) 440-5745

Office: 50 Veronica St, Cobourg Ont K9A 0B8

Mail: 55 Industrial St, Toronto, Ont M4G 3W9