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BY FACSIMILE AND BY HAND
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November 20, 2013
File No: 121770.1003

City Clerk
City Clerk's Office
Toronto City Hall
10th Floor, West Tower
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins, Administrator, Planning and Growth Management Committee

Dear Madam:

**Re: Planning and Growth Management Committee Meeting November 21, 2013
Proposed Official Plan Amendment Pertaining to Economic Health and
Employment Lands Policies and Designations
Objection to Request to Convert Employment Lands-6 Lloyd Avenue
Client: National Rubber Technologies Corp.
Properties: 35 Cawthra Avenue, Toronto
6 Lloyd Avenue, Toronto**

We are the solicitors for National Rubber Technologies Corp. ("NRT"), which operates the existing rubber recycling and manufacturing facility at 35 Cawthra Avenue (the "Property"), south east of the intersection of Keele Street and St. Clair Avenue West. NRT and its predecessor companies have operated in this area since 1927.

NRT's facility recycles and reuses cured and uncured rubber and fibre for the manufacture of automotive and industrial rubber components. NRT annually recycles approximately 10% of the province's used tires. NRT is an integrated manufacturer that both designs and manufactures rubber parts. Tires are collected and ground at NRT's related Commissioners Street operation and then trucked to the Facility. The process begins with scrap tires and finishes with product that is ready to ship to automotive assembly plants or industrial customers.

We are writing this letter in support of the Planning Department's Final Assessment of the conversion request for the property at 6 Lloyd Avenue which is in close proximity to NRT's property at 35 Cawthra Avenue.

Reasons for Support

NRT **supports** the planners' determination in the Final Assessment within the November 5, 2013 staff report that the 6 Lloyd Avenue property should be retained for

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employment uses and not converted to permit residential uses. NRT is particularly concerned with the destabilising effect of the encroachment of new residential uses into the existing heavy industrial Employment Area, which would threaten the ongoing viability of its heavy industrial use and potentially put approximately 130 well-paid unionized employees out of work. NRT therefore objects to the introduction of residential use permissions on the property at 6 Lloyd Avenue.

NRT continues to invest extensive time and resources to modernize its facility and expand its product line. NRT has been very involved in monitoring land use proposals in the vicinity of its Property.

NRT has had the importance of its on-going viability recognized in Ontario Municipal Board proceedings and supported by City staff. One of the Ontario Municipal Board proceedings was a 41 day hearing respecting an earlier proposed residential development at 6 Lloyd Avenue which was ultimately denied by the Board in its October 21, 2008 Decision. NRT has also participated in the hearing process for Official Plan Amendments for St. Clair Avenue both east and west of Keele Street.

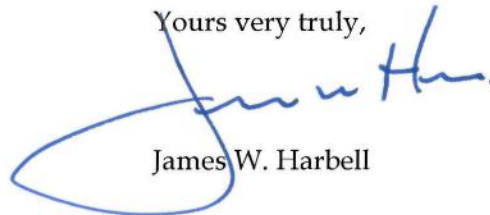
In reliance on the City's ongoing protection of this industrial area and the Board's Decision respecting 6 Lloyd Avenue, NRT has retained confidence that it should continue to invest in the modernization of its plant at 35 Cawthra Avenue. A decision to permit residential uses to encroach will shake this confidence.

The Request

We strongly urge that the Committee **support** the planners' Final Assessment that it is appropriate to retain the property at 6 Lloyd Avenue for employment purposes and that the property be designated *Core Employment Areas*.

If you have any questions or require clarification with respect to NRT's concerns, please contact the undersigned. Thank you for your attention to this matter.

Yours very truly,



James W. Harbell

JWH/vs

cc: Christian Giles, *Policy & Research, City Planning Department*
David Ongaro, *Chief Financial Officer, National Rubber Technologies Corp.*