



CRH Canada Group Inc.
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April 12, 2017

The City of Toronto,
100 Queen St W,
Toronto, ON M5H 2N2

Waterfront Toronto,
20 Bay Street, Suite 1310
Toronto, ON M5J 2N8

Toronto and Region Conservation Authority
101 Exchange Ave
Concord, ON L4K 5R6

Re: Comments on the proposed amendment to the Former City of Toronto Official Plan for the Port Lands, with respect to CRH Canada Group Inc. land holdings

Dear Planning Committee,

We understand that the City of Toronto, with Waterfront Toronto and the Toronto and Region Conservation Authority, are proposing the adoption of an amendment to the Former City of Toronto's Official Plan respecting the Port Lands. CRH Canada Group Inc. ("CRH") represents a major industrial use within the Port Lands and operates two properties within the area affected by this amendment and important to the economic progress of the City: a ready-mix concrete plant owned by Dufferin Concrete ("DC") located at 650 Commissioners Road and a ready-mix concrete plant leased by Ontario Redi-Mix ("ORM") from the Toronto Port Authority at 8 Unwin Avenue.

CRH would like to thank you for this opportunity to provide comments on this important review process. We feel strongly that this Official Plan Amendment fails to provide proper justification to wind down important existing industrial uses, directly affecting CRH. We would like to highlight the importance of sustaining industrial processes like ready-mix concrete within the Port Lands. Ready-mix concrete is essential to building infrastructure within the City of Toronto; however, it is a perishable commodity that is batched upon customer demand and is required to be close to market. Therefore, plants must be located within close proximity to the construction sites within the City of Toronto. It is essential that DC and ORM concrete batching plants remain located within the Port Lands precinct to service the needs of Toronto's infrastructure, including projects resulting from the Port Lands Acceleration Initiative.



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This Official Plan Amendment sets out direction affecting operations for our facilities and is missing detail including important maps and interpretation of actions to address the direct impacts. Consultation activities to date have not been consistent with the level of engagement necessary to achieve support for this amendment. A progressive approach to engagement is expected, which properly addresses land use compatibility within a working port district.

The following are detailed comments that support our overall perspective.

2. Vision

In regards to policy 2.1.3, we would like clarification on whether the proposed redesign and widening affects the entire length or certain portions on Commissioners Street and Unwin Avenue.

3. Objectives

Referring to policy 3.12, the Official Plan Amendment objectives state that it will guide public works in development in the Port Lands to “strategically consolidate and relocate existing uses”. We ask that all landowners and tenants that are currently located with the Port Lands be advised and consulted during this process.

4. Land Use

In Section 4 Land Use, the policy omits the permissions allowed for the “Ports Toronto” district located southwest portion of the Port Lands. As this district houses our leased ORM ready-mix concrete plant at 8 Unwin Ave, we ask that the land use permissions for the “Ports Toronto” district be included in the amendment and we ask to be notified when this information becomes available for comment.

Acknowledging policy 4.15a of the proposed Official Plan Amendment in reference to the Warehouse District, it is stated that the area will transition to *Light Industrial and Production* uses and “new medium- and heavy-intensity industrial uses will not be permitted”. We ask that existing medium- and heavy-intensity industrial uses be permitted to continue to operate within this area. Furthermore, policy 4.2.3 states that “*Light Industrial and Production* land uses permit PIC Core uses and the full range of land uses within light industrial areas excluding uses that are vehicle related”. We require clarification as to the definition of vehicle related light industrial areas and if these specifications permit a ready-mix concrete plant. We recommend that the definition of vehicle related light industrial areas with the aforementioned clarity be included in the Official Plan Amendment.



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In reference to Section 4.4 Managing Land Use Compatibility, sub point 4.4.1 mentions that Port and Industrial uses will be protected from displacement, where possible. We ask that further detail be provided in regards to the protection plans and strategies that will be developed to prevent displacement of industrial uses. Further, policy points 4.4.2, 4.4.3, and 4.4.4 discuss measures to manage sensitive and industrial land uses including noise and air emissions reports, managing separation distances and buffer uses, and source and receptor mitigation techniques. We ask that this section specify the parties that are responsible for undertaking these management measures. Additionally, in 2015/2016 the City of Toronto completed a modelling exercise at our DC site located at 650 Commissioners Street to determine buffers for potential future residential use. It appears that this effort to model and plan for sensitive land uses is contradictory to the processes outlined in the proposed Official Plan Amendment. We recommend that the findings and data from the 2015/2016 exercise be reviewed by the planning committee for the Port Lands prior to the execution of management measures for sensitive land uses.

Policy 4.4.5c states that sensitive land use developers are required to notify residential purchasers on the proximity of continued port and industrial uses within the area during purchase and sale agreements. We ask that this warning clause be specific enough to include the industrial uses within the area such as the operation of a ready-mix concrete plant, if applicable.

5. Parks and Open Spaces

In regards to policy 5.2.6a, the amendment discusses the plans for Leslie Street to become a green spine within the Port Lands that includes a 50 meter wide park buffer around the Commissioners Street to the Leslie Slip Outlook. We ask that the amendment specify the location of this green spine and its effects on properties on Leslie Street on the north side of Commissioners Street.

Section 5.3 speaks to public promenades that will be developed within the Port Lands area and makes reference to Map C. However, Map C is not available at this time for review or comment. We ask that when Map C becomes available that we be given the opportunity to review and comment on any proposed policies in the Official Plan Amendment that reference this map.

Acknowledging policy 5.4, we ask that the definition of a dockwall be provided within the Official Plan Amendment and that a map also be developed to identify areas located within the 18 metre edge of the dockwall.

9. Transportation

Policy 9.1.2 stipulates that lane widths will be minimized within the Port Lands area to encourage safe and pedestrian friendly areas. We recommend that the proposed locations of these changes and the proposed lane reductions be included in the Official Plan Amendment to further the understanding of the impacts of road alterations to the industrial uses within the Port Lands.

Referring to policy 9.11.1, we request that further information be given to clarify the proposed public transit right-of-ways along Cherry Street and Commissioners. We are



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interested in understanding the process of acquiring land for the increased footprint of the street and the effects this process will have on local landowners.

12. Innovation and Sustainability

In reference to policy 12.1, it is understood that the objective of the Port Lands is to become a net zero energy district. We ask that the scope of this objective be expanded upon within the proposed amendment to better understand the sources of emissions (i.e. point source, nonpoint source etc.) that will be considered in the net zero energy plan. Furthermore, policy 12.2 indicates that development on privately-owned land must adhere to the Toronto Green Standard. We request that the amendment clarifies whether the Toronto Green Standard requirement would apply to new or existing development.

Thank you very much for taking the opportunity to work with CRH on this matter. Please contact the undersigned to confirm the status of our request. We look forward to hearing from you on this matter.

As a consequence of our concerns, we request that the Committee defer this matter pending further engagement with stakeholders, including CRH, and appropriate refinement to the amendment. This is our notice of objection. In addition, by copy to the City Clerk, please ensure we are notified of any further action or decisions, on all circulation lists relating to the Official Plan Amendment. If you have any questions please do not hesitate to contact the undersigned directly.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jessie Spasov', written in a cursive style.

Jessie Spasov, M.E.S
Sustainable Development Coordinator, CRH Canada Group Inc.

cc. Clerk, City of Toronto