



PLANNING
URBAN DESIGN
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14 July, 2023

City Council,
Toronto City Hall
100 Queen Street West,
Toronto, ON
M5H 2N2

Email: phc@toronto.ca

Dear Council Members,

**RE: PH5.3 - OUR PLAN TORONTO: RECOMMENDATIONS ON SEVENTY EMPLOYMENT AREA
CONVERSION REQUESTS AND CHAPTER 7 SITE AND AREA SPECIFIC POLICY REVIEW– SASP
793**

OUR FILE: 9061DM

This submission is being made on behalf of Dufferin Concrete, a CRH Company, in relation to the proposed Site and Area Specific Policy (SASP) No. 793 for the lands located at 4630 and 4570 Sheppard Avenue East. A critical location to Dufferin's operations is its Scarborough batching plant located at 1940 McCowan Road, which is immediately north of the proposed SASP lands. This plant is a strategic asset for the City, it being one of few concrete batching facilities able to serve high strength concrete to the northeast area of the City.

The plant, which operates 24/7, supplied concrete to countless roads and homes in northeast Scarborough, playing a critical role in the City's growth to date and will continue to do so well into the future. The Dufferin Concrete Scarborough Plant has also supplied landmark infrastructure projects like the Eglinton LRT, the Scarborough subway extension, Michael Garron Hospital, and the Agincourt GO Station.

The protection of the health and public safety of existing and future residents of the City is of utmost importance and is in accordance with City and Provincial Policy.

The protection of health and public safety includes ensuring that impacts from environmental contaminants such as noise and dust are eliminated or reduced and mitigated.

Dufferin Concrete holds an Environmental Compliance Approval (ECA) for 1940 McCowan Road operations granted by Ministry of Environment (MECP), which ensures that the plant operates within the limits set out in particular guidelines by the Ministry.

As sensitive land uses begin to encroach closer and within regulated setbacks to these facilities, there is a heightened risk of potential nuisance complaints to the City and Province even if provincial standards set for noise and air quality levels are being achieved. Furthermore, the industry's ECA governed by the MECP are put at risk.

SASP 793, as proposed by staff, converts abutting lands out of the employment land base and anticipates a portion of the lands for residential and other sensitive land uses. In order to protect health and public safety, and the industrial land uses required to facilitate development growth within the City, we respectfully request that the following minor policy provision is added to the Site and Area Specific Policy No. 793:

"Notwithstanding any other policy, including d, j and l above, no sensitive land use shall be permitted on Area "A" and/or Area "B" prior to the approval of an Official Plan Amendment in accordance with the following:

- 1. A compatibility analysis be completed to demonstrate no adverse impact will result on surrounding industrial land uses and compliance to all Provincial and municipal policies, guidelines (including the D-Series Guidelines and Environmental Noise Guideline NPC-300, as amended or replaced), and law(s) is maintained for surrounding industrial land uses. The compatibility analysis shall include (i) noise, (ii) air quality, (iii) lighting, and (iv) overlook studies; and***
- 2. The Official Plan Amendment shall delineate the influence area of all stationary sources and include appropriate policies to implement identified mitigation measures both as identified in the studies listed in Policy m(1)."***

It is essential that any proposed sensitive land uses are assessed in line with the specific provincial standards as outlined in the requested policy provision above to ensure that both industrial and sensitive land uses are assessed on a consistent basis and that conditions are accurately reflected in studies.

The minor modification we are seeking to the SASP will:

- Explicitly ensure that Provincial guidelines and policy practices apply to required studies and technical review upfront and prior to the introduction and applications of any potential residential or sensitive land use permissions on the neighbouring lands;
- Ensure that the potential residential or sensitive land uses are not permitted on the lands unless and until these studies are completed and the City is satisfied that it can be demonstrated that no potential impact to future residents; and
- Require that any area not determined to be appropriate for sensitive land uses through the studies be delineated to ensure protection for future residential or sensitive land uses.

We respectfully request that OPA 653, and in particular SASP 793, be modified to include the policy provision as outlined earlier in this letter for the reasons noted above. We further ask to be notified of any decision made by City Council in connection with OPA 653.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "Debra Walker", with a horizontal line extending to the right.

Debra Walker

cc. Jessica Ferri, CRH Canada Group Inc.