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BY E-MAIL

Our File No.: DCRUP854

July 17, 2023

City of Toronto
City Hall
100 Queen Street West, 13th Floor
Toronto, ON M5H 2N2
Attention: City Clerk
E-mail: clerk@toronto.ca

Dear Mayor Chow and Members of Council:

**Re: Item – 2023.PH5.3
Conversion Requests No. 026, 060, 075 and 085
4711. 4723, 4733. 4751 Steeles Avenue East
681 Silver Star Boulevard
29 Redlea Avenue
3447 Kennedy Road**

We represent the following industrial companies which are all located within the North Milliken Employment Area.

D.Crupi & Sons Limited
All-Weld Company Limited
Trisan Construction

K-Line Insulators Limited
Metrocon Ready Mix Corp.
Costafam Holdings Inc.

The purpose of this letter is to voice our clients strong concerns and objections to the proposed conversion of Employment lands in the Milliken Employment Area.

The proposed conversions No. 026, 060, 075, and 085 are not consistent with the Provincial Policy Statement, do not conform to the City's Official Plan, are contrary to the stated purpose of Official Plan Amendment 231, are without planning justification, and are contrary to the recommendations of City staff.

The Staff report considered by the Planning and Housing Committee contains a detailed planning analysis of the proposed conversions and determined that:

1) The Milliken Employment Area accommodates a range of uses, from heavy industry, asphalt, and aggregate suppliers, concrete batching, to businesses that serve the local business community.

- 2) The Milliken employment area contains over 1,000 establishments that employ approximately 7,650 people.
- 3) This employment area continues to thrive and appeals to a range of uses, and is anticipated to continue to remain a south after and well-functioning employment area.
- 4) This employment area accommodates a significant source of local jobs where providing convenient access to jobs contributes to the achievement of a complete community.
- 5) There is no need to convert these employment lands.
- 6) Staff have significant concerns with the redesignation of the conversion requests in this area to permit residential permissions both individually and cumulatively.
- 7) The conversion of these lands would reduce the City's already limited supply of lands exclusively for business and there is significant risk that a conversion of one or more of the lands within this area would set a precedent for future conversion in the area and erode the quantity and quality of the Employment Area.
- 8) An introduction of sensitive uses could jeopardize the ability to provide a stable and productive operating environment for existing and new businesses and their economic activities.
- 9) Strong concerns from local industry were raised in regard to the ability to maintain existing ECAs, as well as the potential for introducing sensitive uses to heavy industrial areas, leading to safety concerns, the introduction of nuisance complaints and the interference with daily operations.
- 10) The maintenance of truck access is also of critical importance to industry in this area, and the introduction of high density residential uses will greatly increase transportation times and congestion.
- 11) Staff have concerns with the proximity of nearby facilities and the potential for compatibility issues between sensitive land uses and impacted industries.
- 12) Peer reviews of the proposed conversions could not confirm that the proposed residential conversions are compatible with in the existing Employment Area
- 13) Existing and permitted development within this Major Transit Transfer Station Area is planned for and meets the minimum employment and population target of 150 jobs and residents combined per hectare.
- 14) The proposal for residential uses in this location does not support the achievement of a complete community as it would not provide residents with convenient access to community facilities such as parks, schools, libraries and community centres.
- 15) Staff reviewed the conversion requests against the policies of the Provincial Policy Statement 2020, the Growth Plan 2020, and the Official Plan and recommended that the lands be retained as Employment Areas and continue to be designated as General Employment Areas.

For the reasons set out above we ask that Council accept the recommendations of staff, that the conversion requests No. 026, 060, 075, and 085 be denied and that the subject lands remain designated as General Employment within the Milliken Employment Area.

Yours truly,

DEVRY SMITH FRANK *LLP*



David S. White, Q.C.
DSW/jrg