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By E-mail  
phc@toronto.ca

The Chair and Members  
Planning and Housing Committee  
Toronto City Hall  
100 Queens Street West  
Toronto, ON M5H 2N2

Dear Sirs and Madames:

**Re: Planning and Housing Committee Public Meeting, July 5, 2023**  
**PH5.3 Our Plan Toronto: Conversion Requests and Chapter 7 Site and Area**  
**Specific Policy Review – Final Report**  
**Request No and Addresses:**  
**99 – 266-268 Royal York Road, Rear**  
**124 – 12-50 Drummond Street and 1, 1a and 1b Harold Street**

We represent Gambles Produce Inc. (“Gambles”) with respect to the Gambles Produce Distribution Centre located at 302 Dwight Avenue, which is in proximity to the above-noted conversion requests.

The purpose of this letter is to express **Gambles’ support for City Staff’s recommendations with respect to conversion requests #99 and #124**; that these lands be retained as Employment Areas designated lands and continue to be designated as Core Employment Areas.

In the case of conversion request #99, a SASP that does not allow any residential dwellings or amenity space (or any residential or non-residential sensitive land uses) but is to continue to allow compatible Employment Area uses to be permitted on the Core Employment Areas portion of the lands is appropriate

### Background/Context

The Gambles Produce Distribution Centre located at 320 Dwight Avenue (the “Property”) is designated by the City of Toronto Official Plan as Core Employment Area. The produce distribution facility on the Property operates in conjunction with a distribution centre located at the Ontario Food Terminal (165 The Queensway). The Distribution Centre on the Property operates 24 hours a day/7 days a week with 190 employees. Most of the emission impacts from the Distribution Centre are noise related. The Distribution Centre is a refrigerated/climate controlled warehouse. Rooftop chiller units and truck refrigeration compressors are not insignificant sources of noise, particularly when activity on the Property ramps up at 3 to 4 am to pre-load and stage trailers for local shipment dispatch starting at 6 am.

The Distribution Centre, constructed in 2006, is already at capacity. Gambles submitted an application for Site Plan Approval to the City in April, 2022, to construct an addition to the existing refrigerated warehouse of approximately 4, 600 square metres (22 137068 WET 03 SA), which represents an 80% increase in capacity.

The existing Distribution Centre on the Property would likely be considered a Class II industry under the MECP D1-D6 Land Use Guidelines. Class II industrial uses have a potential influence area of 300 metres and a minimum separation distance of 70 metres is required.

However with the proposed addition, the Distribution Centre on the Property will have a greater number of employees and more shift change traffic, more shipping activity, a greater number of rooftop chillers and more refrigerated truck traffic on the Property. The expansion could elevate the Gambles' Distribution Centre to a Class III industry under the MECP D1-D6 Land Use Guidelines. Class III industrial uses have a potential influence area of 1000 metres and a minimum separation distance of 300 is required.

The Property is situated within approximately 170 metres of the nearest lot line of the conversion request #124 lands and is within approximately 300 metres of the conversion request #099 lands. The Property is located in close proximity to lands being considered for conversion as noted above, with all being located within the potential influence area of the Distribution Centre located on the Property.

### Conversion Analysis and Land Use Compatibility

The requested conversion requests are for lands that are not isolated from other Employment Areas designated lands. The conversion of these lands is also not required to mitigate existing land use conflicts.

Also, the conversion lands are located within the Council-adopted Mimico Protected Major Transit Station Area ("PMTSA"). Permitted development within the PMTSA is planned to meet a minimum population and employment target of 200 residents and jobs combined per hectare. The proximity of the Mimico station that serves the GO Lakeshore line to the proposed conversion lands means that lands so converted would be developed with transit supportive residential densities. Medium and high density residential development has far greater potential to compromise the planned function of Employment Area designated lands and put major facilities in jeopardy.

Gambles supports City Staff's recommendations with respect to conversion requests #99 and #124; that these lands be retained as Employment Areas designated lands and continue to be designated as Core Employment Areas.

### Policy Analysis

Approving either of the above-noted conversion requests is contrary to A Place to Grow, Growth Plan for the Greater Golden Horseshoe ("Growth Plan"), particularly policy 2.2.4.17 a) and d) as these conversions will adversely affect the overall viability of an Employment Area and maintenance of a stable operating environment for business and economic activities.

The proposed conversions are also contrary to the Provincial Policy Statement, 2020 (the "PPS"), particularly policies 1.2.6.1 and 1.2.6.2, because the long-term operation and economic viability of the major facility on the Property has not been ensured. In addition, policies 1.3.2.1, 1.3.2.2 and 1.3.2.3 direct planning efforts to protect and preserve Employment Areas planned for industrial and manufacturing uses from the encroachment of sensitive land uses in order to maintain land use compatibility. Clearly, the proposed conversions offend such PPS policies.

The proposed conversion requests that would allow residential uses within the potential influence area of the Gamble Property would not be in conformity with the Growth Plan or consistent with the PPS - policies that are aimed at protecting Employment Areas that are planned for and are occupied by industrial and manufacturing uses.

The proposed conversion requests are also contrary to the conversion policies of City of Toronto Official Plan Amendment No. 231, particularly policy 2.2.5.9, because there is no demonstrated need for these

conversions and the proposed conversions will adversely affect the overall viability of the Employment Area.

## Conclusion

In conclusion, Gamble supports City staff recommendations to not support the Employment Area conversion requests #99 and #124 and for such lands to remain designated as General Employment and Core Employment Areas.

We request notification of any future meetings, Staff reports produced and any decisions made relating to conversion requests: #99 and #124 and any related Official Plan Amendments. Thank you for your attention to this matter. If you have any questions or require further information, please contact me.

Yours truly,

STIKEMAN ELLIOTT LLP



Calvin Lantz  
Partner

CL/na

cc. Councillor Amber Morley (Councillor\_Morley@toronto.ca)  
Jeff Hughes, President, Gambles Produce Inc. (Jeff.Hughes@goproduce.com)