



January 16, 2026

RE Employment Land Conversion 20 Leslie St and Employment land Conversions in General

CBM Ready Mix (a division of ST Marys Cement) operates a Ready-Mix Concrete plant at 651 Commissioners St in the Portlands. This area was set up as a concrete campus and originally meant for concrete plants to relocate, operate and supply the concrete demands for the growing city.

Ready mix concrete production is an industrial process that combines sand, stone, cement powder, and water through a plant into a mixer truck to create concrete. This concrete is then trucked to construction sites throughout the city.

I am writing to express concerns about the proposed development at 20 Leslie St and other proposals like this that convert land designated for industrial uses to Residential uses. This proposal would permit the introduction of residential housing on tracts of land currently reserved for industrial and employment uses only. Preliminary designs for this application, and the 3 others currently being looked at, demonstrate mid- to high-rise residential towers. CBM feels this type of development is incompatible with the current land use in the area.

CBM facilities are operated under Environmental Compliance Approvals (ECA) from the Ministry of the Environment. Extensive assessment reports are required for the approvals which analyze our air and noise emissions. This analysis demonstrates that the plants operate within the MOE regulated limits. However, there are issues associated with Ready Mix concrete that can be disturbing or seen as a nuisance to neighboring incompatible nonindustrial land uses.

To operate the plant, we require raw materials to be imported to the site by tractor trailers and the finished concrete to leave the site in concrete mixer trucks. This creates traffic with large trucks maneuvering through congested and narrow roadways.

Fugitive dust plans are in place as part of our approvals at all our concrete facilities but there are still some dust issues that are associated with industry. Hot, dry, windy days present challenges to our industry that can be overcome but sometimes impact nearby properties.

Concrete plants sometimes need to operate early in the morning to service the construction customers. Loaders are used to load sand and stone materials into the plant, truck-based blowers transfer cement into enclosed silos, and large trucks deliver



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products to and from the plant. This process leads to loud industrial sounds. These sounds create compatibility problems with residential land uses.

As uses, such as those proposed at 20 Leslie St, are allowed to move closer to established industrial areas they create sensitive receptors that conflict with the present industrial area. This conflict must be rectified in the form of mitigation by the industrial operation. Industrial uses may have been present in the area for decades without requiring mitigation. Traffic must be rerouted, operations that create even a small amount of dust must be stopped and extensive noise reduction measures (barriers, walls, restrictions on hours and production) must be undertaken. These mitigation measures are expensive and restrictive to operational movements.

In our experience where there were once no receptors or conflict there are now incompatible uses, such as residential, that have moved closer to our operations. Once established these residents began to complain to authorities, brought enforcement action against our operations and limited our plant's ability to operate. These conflicts are forcing us to move out of urban areas originally meant for Industry.

To conclude CBM would once again would like to emphasis our concerns about conversions of employment land to residential uses. The City of Toronto relies on Industries such as the concrete industry to provide employment and to build the city. Construction of new residential areas is dependent on the concrete industry. If non compatible uses continue to move closer and impede operations the ability to supply this demand for concrete will be impeded.

Thank you very much for consideration of our comments. Please feel free to contact me at the information below if you wish to discuss these matters further.

Thank you very much

A handwritten signature in black ink, appearing to read 'Colin Evans', written in a cursive style.

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