



**Ready Mixed Concrete Association of Ontario**

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City of Toronto  
Planning and Housing Committee  
100 Queen Street West  
Toronto, Ontario  
M5G 2N2

**Subject: Employment Land Conversion – 20 Leslie Street and Employment Land Conversions**

On behalf of the **Ready Mixed Concrete Association of Ontario (RMCAO)**, we are writing to express our strong concerns regarding the proposed redevelopment and rezoning at **20 Leslie Street**, as well as other current and future proposals that would convert lands designated for **industrial and employment uses** into **residential uses**.

RMCAO represents Ontario's ready mixed concrete producers, who play a critical role in supporting the construction of the province's housing, infrastructure, and employment growth. We have six concrete producer members that operate concrete manufacturing plants in the Portlands area of the city that may be negatively impacted by this potential rezoning. Additionally, we have two Associate members who operate cement terminals in this same area that may be negatively impacted by this potential zoning change. Over the past decade, the Association has worked actively with the City of Toronto to purposefully establish a "Concrete Campus" to support the city's concrete manufacturing operations in this industrial area, and to avoid the potential negative interactions with residential communities. To this end, both cement terminals and concrete plants have been relocated to this area to avoid conflicts at significant expense to both our members and the City of Toronto.

**The Importance of Ready Mixed Concrete Operations in Toronto**

Ready mixed concrete production is an industrial process that combines locally sourced sand, stone, cement powder, and water through a batching plant into concrete mixer trucks to produce fresh concrete. This concrete must then be delivered within 90 to 120 minutes of initial mixing to construction projects throughout the city. These facilities, therefore, require continuous operational flexibility, including reliable material deliveries and safe truck access to and from industrial properties.

The City of Toronto relies on ready mixed concrete operations to support:

- Residential and commercial construction,
- Critical infrastructure and transportation projects,
- Employment and economic activity in the industrial sector, and
- The reliable delivery of essential building materials within the urban core – traffic congestion quite simply will not allow for effective concrete delivery from outside of Toronto.

### Concerns with Introducing Residential Uses into Industrial Areas

RMCAO is concerned that the proposed development at 20 Leslie Street would introduce **residential housing into an established industrial and employment district**, creating conflicts between sensitive residential uses and existing industrial operations. Preliminary designs for this proposal, along with other similar applications currently under review, indicate **mid- to high-rise residential towers**, which we believe are incompatible with the intended land use function of the area and may directly threaten the ongoing operation of ready mixed concrete production.

These proposed land use conversions risk undermining the long-term viability of existing industrial and employment uses by placing new residential “**sensitive receptors**” in close proximity to long-standing manufacturing operations.

### Environmental Compliance and Operational Compatibility Challenges

Ready mixed concrete plants operate under **Environmental Compliance Approvals (ECAs)** issued by the Ontario Ministry of the Environment, Conservation and Parks (MECP). These approvals require extensive technical assessments addressing air quality and noise emissions and demonstrate that plants operate within regulated provincial limits.

However, even when operating in compliance with all requirements, certain industrial realities associated with ready mixed concrete production can be disruptive or perceived as a nuisance to nearby **non-industrial land uses**, including residential development. These challenges include:

1. **Truck Traffic and Site Logistics** – Concrete operations require raw materials to be delivered to the concrete plant daily by tractor-trailers. The raw materials are then proportioned at the concrete plant, mixed, and shipped via concrete mixer trucks to construction sites in the downtown core. Introducing residential development adjacent to these **existing operations** increases the likelihood of conflicts, complaints, and pressure to restrict industrial truck access, which is essential to our industry’s operations.

2. **Fugitive Dust** – While ready mixed concrete facilities operate with dust control and management plans as part of their ECA requirements, dust remains an operational consideration across many industrial sites. Hot, dry, and windy conditions can present challenges, and even where best practices are followed, nearby residential uses may raise concerns.
3. **Noise and Early Morning Operations** – Concrete production is often required during early morning hours to meet the timing requirements of construction projects. The industrial processes and necessary equipment involved create industrial noise that may be perceived as incompatible with nearby residential uses, even though these operations are essential to serving city-wide construction needs.

### **The Long-Term Impact of Employment Land Conversions**

RMCAO is deeply concerned about a growing trend in which residential developments are being proposed closer and closer to established industrial areas. This shift creates conflicts that are often “**resolved**” by requiring industrial operations to implement costly and restrictive mitigation measures, including:

- Rerouting truck traffic,
- Limiting operating hours,
- Modifying production schedules,
- Installing noise walls or barriers, and
- Implementing additional dust reduction and monitoring measures.

These measures may be expensive, disruptive, and operationally limiting, even though the **industrial uses were established first and have operated for decades without conflict**.

RMCAO members have experienced situations where residential development moved closer to existing industrial operations, and complaints soon followed, resulting in:

- Enforcement actions,
- Operating restrictions, and
- Reduced ability to serve construction demand.

Ultimately, these pressures can force industrial operators to reduce operations or relocate from urban areas originally intended to support industry.

### **Conclusion**

RMCAO respectfully urges the City Solicitor and appropriate City Staff to attend the OLT hearing to oppose the Official Plan Amendment application in its current form and to continue discussions with the applicant to resolve outstanding issues.

The concrete industry provides both employment and essential materials required to build housing, infrastructure, and complete major city-building initiatives. If incompatible residential uses continue to encroach on employment lands and restrict industrial operations, Toronto's ability to meet construction demands, including housing supply goals, will be negatively impacted.

Thank you for considering RMCAO's comments. We would welcome the opportunity to discuss these matters further and to support the City in maintaining compatible, balanced land use planning that protects employment lands and ensures continued access to critical construction materials.

Sincerely,



Bart Kanters, President  
Concrete Ontario