



April 9th, 2026

City of Toronto Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Re: PH29.8 - 110 West Toronto Street - Official Plan Amendment Application - Appeal Report (Ward 5)

Dear Chair - Planning and Housing Committee,

I am writing on behalf of [Circular Partners Inc.](#) to express our strong support for the City's position to oppose the proposed Official Plan Amendment for 110 West Toronto Street.

As outlined in our previous correspondence regarding the preservation of employment lands, our organization operates a centralized reuse, recycling, and material recovery facility at the Keele Centre (at 500/530 Keele), one of the remaining Employment Area sites in this district. This location is critical not only to our operations, but to the broader network of industrial, environmental, and economic activities that depend on the continued protection of employment lands.

Over the past 11 years, our facility has diverted **more than 21 million pounds of material** from landfill, preserving green spaces, reducing greenhouse gas emissions, and directly supporting the City's Long Term Waste Management Strategy and TransformTO Net Zero goals.

While the current report highlights the importance of employment lands for jobs and economic activity, we would emphasize that facilities like ours represent essential environmental infrastructure within the city. Our operation enables reuse, recycling, and diversion activities to occur locally, reducing reliance on long-distance transport, minimizing emissions, and ensuring materials are managed responsibly within the region.

The proposed conversion of employment lands to mixed-use or residential introduces long-term risks to operations such as ours and is not aligned with the City's established policy direction to protect and preserve employment areas. Industrial activities, including material recovery, logistics, and processing, require space, flexibility, and tolerance for operational realities such as truck movement and noise. The introduction of sensitive uses in proximity to these activities can gradually constrain operations, limit future growth, and ultimately displace critical services from the city.

Relocation is not a simple or viable solution. Facilities like ours depend on access to appropriately zoned land, transportation corridors, and proximity to material sources. As employment lands continue to diminish, opportunities to sustain or expand this type of infrastructure within Toronto become increasingly limited.

Beyond environmental benefits, our operation contributes to local economic development, supporting green jobs and servicing a growing network of construction, institutional, and commercial partners. In the past year alone, we have created additional green jobs while expanding capacity to meet increasing demand for material diversion and circular solutions.

We respectfully urge the City to continue protecting employment lands and to take a long-term, balanced approach to growth that safeguards space for jobs, infrastructure, and essential environmental services. The continued conversion of these lands risks prioritizing short-term land value over long-term city-building objectives, ultimately undermining the systems that support Toronto's economic resilience, sustainability, and livability. Maintaining this balance is critical to ensuring the city remains not only a place to live, but also a place to work, operate, and build a sustainable future.

Thank you for your leadership and for considering our perspective. We would welcome the opportunity to provide further information or engage in continued discussions.

Sincerely,

Kelly McCaig

Circular Partners Inc.

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