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Our File No.: 091446.00001

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Via Email (louis.bitonti@ontario.ca)

Louis Bitonti
Municipal Services Ontario- Central Ontario
13th Floor, 777 Bay Street
Toronto, Ontario M5G 2E5

Dear Mr. Bitonti:

**RE: City of Toronto Official Plan Amendment No. 653 ("OPA 653")
Atlantic Packaging Products Ltd. objection to proposed redesignation of Nos. 1,
11-37, 12, 16, 20-26 William Kitchen Road and 2201 Kennedy Road, Toronto
ERO Number: 019-7731
Ministry Reference Number: 20-OP-238506**

This submission is being made on behalf of our client Atlantic Packaging Products Ltd. ("**Atlantic**"). They operate two successful "employment" facilities that neighbour the two above-noted conversion request parcels located at Nos. 1, 11-37, 12, 16, 20-26 William Kitchen Road and No. 2201 Kennedy Road (being the "**Conversion Lands**").

The purpose of this letter is to express our client's objections to the two requests. Specifically, we ask that:

- a) the Minister endorse City of Toronto staff's assessment that the lands should be retained as "Employment Areas" and continue to be designated as "General Employment Areas" in the City of Toronto Official Plan; and
- b) the Minister does not approve the "last minute" politically motivated City councillor's directed conversion approval that is brought forward in OPA 653.

To highlight the concerns of our client, we have included their submissions to City staff and Councillors for you to review. You will note our client has been vocal, public, and consistent with its opposition to the requested conversion and not once did the landowner or local Councillor reach out to address the concerns. We also wish to highlight that this conversion request is of grave enough concern that our client attended and spoke at the City's Planning and Housing Committee in the summer of 2023 in support of City staff recommended refusal. It was only at that time did they realize that the local Councillor intended to override City staff recommendations (with no presented justification).

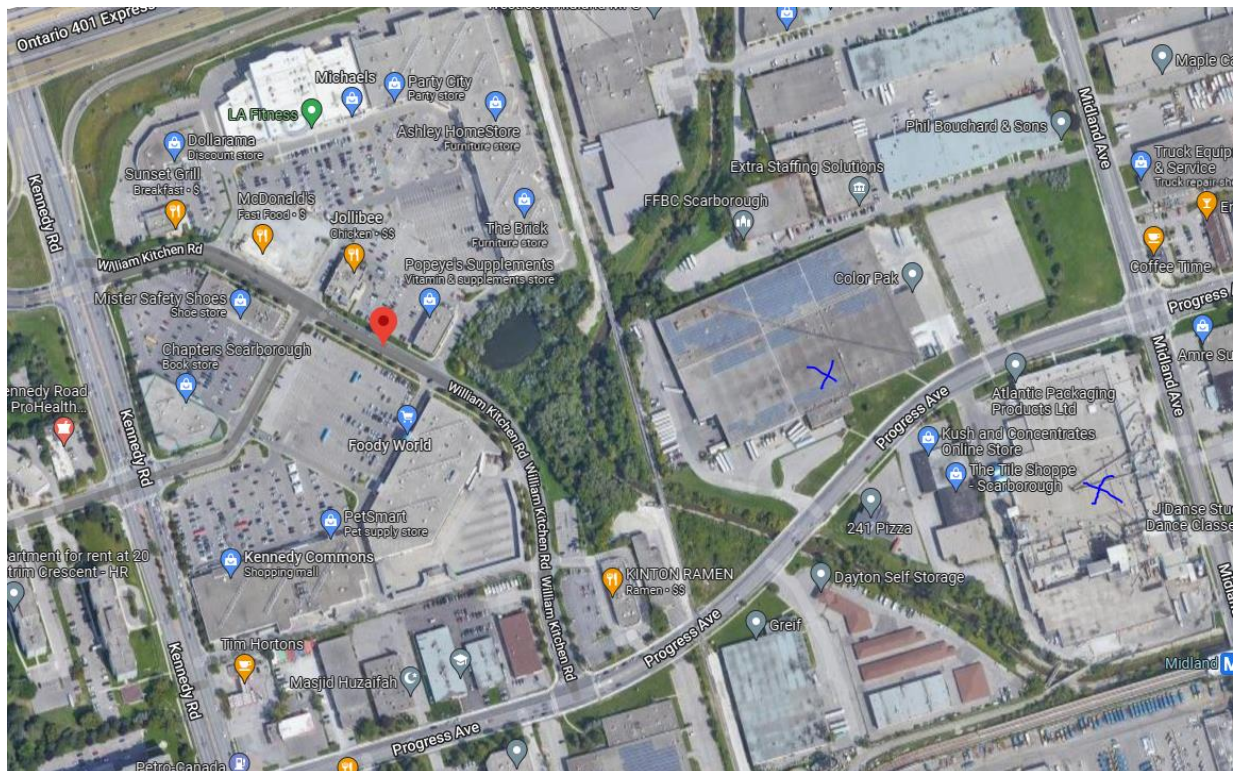
CONTEXT

Across North America, Atlantic employs more than 2500 employees, and of these, 1500 employees are working in the Scarborough and greater GTA area in a total of 9 manufacturing sites in the GTA (6 of the 9 are in Scarborough). **Atlantic continues to show its commitment to the community by investing in its operations in Scarborough to exceed regulatory standards.**

As detailed in the enclosures included with this request of the Minister it is important to realize the "physical" relationship between our client's properties and the Conversion Lands. The first facility is located at 80 Progress Avenue (with an abutting employee parking lot at 110 Progress Avenue). It incorporates a pre-print facility, distribution facility and paper bag manufacturing. The second facility is located at 111 Progress Avenue which is the head office, recycled paper mill and corrugated converting facility. Both of these are situated in very close proximity to the employment lands being considered for conversion to non-employment uses (which are located at 1, 11-37, 12, 16, 20-26 William Kitchen Road and 2201 Kennedy Road. The issue of "nearness" impacts potential noise and vibration impacts, and perceived odour and air quality. Also relevant to our client is the shared use of Progress Avenue that serves both of our client's facilities as well as being the main artery out of the Conversion Lands.

The Atlantic facilities are classified as a Class III industrial land use under the D6-guidelines. Class III industrial uses have a required separation distance (lot line to lot line) of 300 metres. The Atlantic facilities have potential to cause offsite air quality, odour and noise impacts within these separation distances. The Conversion Lands are located partially within the minimum separation distance, and entirely within the potential influence area, associated with the Atlantic facilities.

Figure 1. Air photo of our client's facilities in relation to the Conversion Lands



CITY STAFF COMMENTS

We would also like to highlight on behalf of our client the following comments against the conversion request that were provided by City staff after comprehensively reviewing the formal request.

Amongst an extensive list of issues that confirmed the Conversion Lands should not be redesignated, City staff identified the following:

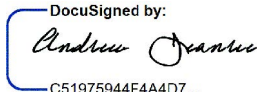
- “ • Impact of the removal of a large and key location for employment uses;
- The ability to provide a stable and productive operating environment for existing and new businesses and their economic activities;
- Provision of a variety of land parcel sizes to accommodate a range of permitted employment uses;
- Provision of a diverse economic base to accommodate and attract a variety of employment uses and a broad range of employment opportunities in Toronto;
- Compatibility with surrounding existing and permitted land uses;
- Proximity to heavier industries and nearby environmental compliance approvals;
- Impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses;
- *Employment Areas* strategically located near important transportation infrastructure to facilitate the movement of goods including highway interchanges”

City staff's position was that the “the lands should be retained as *Employment Areas* and continue to be designated as *General Employment Areas*.”

In closing, Atlantic welcomes further discussion with Provincial staff. We thank you for the opportunity to comment on this important matter.

Yours truly,

BENNETT JONES LLP

Per:  C51975944F4A4D7...

Andrew Jeanrie

c.c.: Client
Kim Wright, Wright Strategies Inc.

enclosures