



BUILDING A GREATER GTA
Building Industry and Land
Development Association

September 12, 2012

Councillor Peter Milczyn &
Members of the Planning and Growth Management Committee
City of Toronto, City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Councillor Peter Milczyn &
Members of the Planning and Growth Management Committee,

**Re: September 13, 2012 Planning and Growth Management Committee Meeting
Agenda Item: PG17.7 Official Plan Review: Employment Uses Policies (Ward All)**

The Building Industry and Land Development Association is in receipt of the staff report entitled “Official Plan Review: Employment Uses Policies” and we offer you the following comments on behalf of our residential and non-residential BILD Toronto Chapter members, in advance of the September 13th Planning and Growth Management Committee meeting.

We note that the staff report provides the direction to strengthen the employment uses policies to account for the increasing competition for a finite supply of land. Drawing on this conclusion, the staff report outlines a variety of policy directions from the City’s consultant.

IN PRINCIPLE

Acknowledging a finite supply of land, BILD members believe that in an effort to efficiently utilize the land, increased density permissions should be applied to employment lands. This added density should be permitted as-of-right. This will also support the objective to maintain the existing employment land base.

If increased density was granted on these sites, there would be an opportunity to include additional mutually-compatible land uses to those employment lands. This would provide flexibility in land-use designs and support the objective to build complete communities for the residents of Toronto.

POLICY DIRECTIONS

The first bullet point in this section states that “*Integrate long range plans for transit, land use and economic policy to enable the city to development intensified office employment clusters in mixed use environments.*” BILD members request consultation in this regard. We believe that in these scenarios a comprehensive analysis should be undertaken by staff to attest to the reasonableness of this request.

With respect to the consultants’ set of directions to inform the Official Plan’s policies, the report indicates that “*Employment Areas have the same protection and mitigation requirements as Employment*

Districts.” BILD disagrees with the City’s position that *Employment Areas* be given the same protection as *Employment Districts*. We would request further consultation on this matter.

This section continues by stating that the “*Avenues and Mixed Use areas need to accommodate continued intensification.*” BILD supports this direction as it is in keeping with our principle statements as noted above. We believe that intensification targets should be included in this bullet to complement its objective. Additionally, we seek consultation for how the City intends to accomplish this objective in the absence of increased as-of-right zoning permissions.

The last bullet point in this set of directions indicates that “*Institutional uses need to maintain their land base and be accommodated in Mixed Use areas.*” Again, BILD members request consultation in this regard. We believe that in these scenarios a comprehensive analysis should be undertaken by staff to attest to the reasonableness of this request.

Finally, the staff report suggests some new ideas for the Official Plan, including a suggestion to “*Require a minimum amount of office space on large parcels.*” BILD members seek clarification for what is considered a large parcel of land. Furthermore, BILD members believe that the neighbourhood context should be considered and the adjacent property land-use mix should also inform this suggestion, if it were to be adopted by Committee.

BILD RECOMMENDATION

BILD recommends that the members of the Planning and Growth Management Committee provide direction to staff to consult with BILD members, similar to the process followed with the review of the City’s proposed Official Plan Heritage Policies, and that staff be directed to report back to this Committee when this consultation has commenced.

BILD appreciates the opportunity to submit comments and we look forward to future opportunities for stakeholder engagement. Please feel free to contact the undersigned if you have any comments or concerns.

Sincerely,



Danielle Chin, MCIP, RPP
Municipal Government Advisor

CC: *Kerri A Voumvakis, Acting Director, Policy and Research, City Planning, City of Toronto*
Leona Savoie, BILD Toronto Chapter Co-Chair
Steve Deveaux, BILD Toronto Chapter Co-Chair
Paula Tenuta, Vice President, Policy & Government Relations, BILD
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