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City of Toronto
City Hall - City Planning Department
100 Queen Street West, 12th Floor East
Toronto, Ontario
M5H 2N2

Attn: Ms. Jennifer Keesmaat, MCIP, RPP, Chief Planner

**Re: Proposed Economic Health Policies and Proposed Policies and Designations for
Employment Lands – Official Plan Review
Carlaw / Dundas Neighbourhood - City of Toronto
Our file: 1742**

We are the planners of record for the properties located at 388 Carlaw Avenue & 10 Dickens Street, collectively known as the 'Carlaw Industrial Centre'. We welcome this opportunity to provide our submission with respect to the proposed Employment Lands policies, as adopted by Planning & Growth Management Committee on September 12, 2013, and as part of the City of Toronto's Official Plan Review.

Please accept our comments and recommendations regarding the Employment Land and Areas policies, attached as Table 1: Comments & Recommendations on the Proposed Economic Health Policies and Proposed Policies and Designations for Employment Lands. As well, please accept our comments and recommendations on Area Specific Policy No. 247 (formerly No. 154), as it relates to the Carlaw Dundas Employment Area, attached as Table 2: Comments & Recommendations on the Proposed City of Toronto Official Plan Review: Area Specific Policies for the Carlaw Dundas Employment Area.

The Carlaw / Dundas Neighbourhood Improvement Plan of June 2000 acknowledged that urban renewal was needed to provide future opportunities to achieve City building goals and objectives.

POUND & STEWART ASSOCIATES LIMITED

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This Neighbourhood Improvement Plan sets out to:

- *Identify deficiencies in the neighborhood, i.e. services, parks, and public space;*
- *Identify opportunities for improving and supporting comment development, the local businesses and industry, safety, heritage, local transportation and harmonious land uses;*
- *Identify opportunities for improving the community of the benefit of residents, business and those who work there.*

In supporting positive change, the Neighbourhood Improvement Plan effectively implemented the principle of maintaining the existing mixed use industrial and residential character, affordability, and improved stability, through the reuse of existing buildings and to preserve the Heritage/Historical structures. The Plan refers to its historical past where *“Carlaw industry giants; Colgate, Wrigley’s Dylex, Weston’s, Woods and dozens of others contributed to local charitable efforts.”*

As a result of the foregoing, residential and live/work uses remain permitted when located within mixed use buildings, as encouraged by the in effect, area specific Official Plan policy no. 154. This policy laid the foundation of urban renewal and positive change in the Carlaw / Dundas Neighbourhood.

Today, the urban character of this area is best described as a convergence of re-urbanizing Avenues, with its focal point being the intersection of Carlaw Avenue and Dundas Avenue East, both Major Streets in the context of the City’s Official Plan.

The City’s Official Plan Review maintains this area as an Employment Area. This Employment Area itself is not large in land area, being approximately 13.3 ha. (32.8 acres), when compared to other Employment Areas in the City. As well, this South Riverdale Community is surrounded by low density residential neighbourhoods for the most part. Please refer to our Image 1.

This neighbourhood continues to experience needed urban renewal through intensification, largely based on the progressive urban renewal policies, as successfully established by the City of Toronto Official Plan. Please refer to our Image 2.

For the foregoing reasons we respectfully suggest the following as part of the City's Official Plan Review:

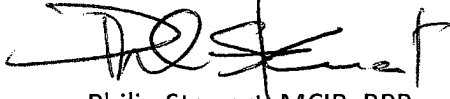
- Although remaining as an Employment Area, the proposed *Core Employment Areas* designation, when combined with Area Specific policy No. 247 (to replace no. 154), no longer truly reflects the existing and emerging urban character of this area. Given the City's proposed Employment Areas land use designation hierarchy, the more appropriate land use designation, we suggest is, *General Employment Areas*. This recommended Employment Areas designation more adequately reflects the intent of the Principles for Development (as set out in the Neighbourhood Improvement Plan) for Carlaw Avenue and Dundas Street East, both urban corridors, bi-secting this Employment Area. Please see our Figure 1: Proposed Recognition of the Carlaw Dundas Employment Area as "*General Employment Areas*" based on Community Context;
- The Neighbourhood Improvement Plan also acknowledges that change and renewal are ongoing, and the most significant conclusion reached, is the principle of maintaining the existing mixed use industrial and residential character, affordability, and improved stability, through the reuse of existing buildings to preserve the Heritage/Historical structures. As a result, residential and live/work uses are permitted, when located within mixed use buildings located within this Employment Area. This ensures that this area continues to evolve as intended, as a mixed use urbanized Employment Area. Our recommended recognition of the *General Employment Areas* designation broadens land use opportunities to allow this area to be a more complete community. This further strengthens urban renewal, supports reduction in congestion by providing opportunities for people to live and work nearby. Cultural diversity is also enhanced given the demand that existing and new residents and workers may have, thereby supporting continued urban renewal;
- Although City Planning Staff propose to eliminate *Avenues* from all *Employment Areas*, Carlaw Avenue, between Gerrard Street East and Queen Street East (both Urban Structure: Avenues), exhibits the urban characteristics of an Avenue, and ought to be considered as such, in this urban context. Carlaw Avenue links the major east-west Gerrard Street East and Queen Street East Avenues. Carlaw Avenue also shares its urban character with the intersection of Dundas Street East. The June 2000 Neighbourhood Improvement Plan contributes to this objective and a future Avenue Study will contribute to continued growth and redevelopment of this area. In summary, under the

Urban Structure of the City's Official Plan, the urban character of this area is best described as re-urbanizing Avenues, inclusive of these existing Major Streets, with their focal point being the intersection of Carlaw Avenue and Dundas Avenue East. For these reasons we recommend that the proposed Urban Structure Map, dated July 25, 2013, (Appendix 1 of the City of Toronto Staff Report, dated August 20, 2013) (our Figure 2) be revised accordingly;

- In support of the City's effort to create cultural capital, cultural industries will be encouraged given their potential for wealth and job creation where they are complementary and compatible to the character of this area. We recommend that the *General Employment Areas* designation would better support this purpose.

In support of the foregoing comments please refer to the attached documentation and we look forward to your consideration of the foregoing.

Yours truly,
Pound & Stewart Associates Limited



Philip Stewart, MCIP, RPP

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- Attachments:
- Table 1:** Comments & Recommendations on the Proposed Economic Health Policies & Proposed Policies & Designations for Employment Lands
 - Table 2:** Comments & Recommendations on the Proposed City of Toronto Official Plan Review: Area Specific Policies for the Carlaw Dundas Employment Area
 - Image 1:** Community Context - Urban Structure: Avenues for the Carlaw Avenue & Dundas Street East
 - Image 2:** Street View looking south on Carlaw Avenue
 - Figure 1:** Proposed Recognition of the Carlaw Dundas Employment Area as "*General Employment Areas*" based on Community Context
 - Figure 2:** Proposed Avenues (Carlaw Avenue & Dundas Street East)

- cc. Ms. Ulli Watkiss, City Clerk, City of Toronto
- cc. Ms. Kerri Voumvakis, City of Toronto
- cc. Mr. Paul Bain, City of Toronto
- cc. Ms. Rebecca Condon, City of Toronto
- cc. Mr. Richard Zoppas, President, 'Carlaw Industrial Centre'

POUND & STEWART ASSOCIATES LIMITED

TABLE 1: COMMENTS & RECOMMENDATIONS ON THE PROPOSED ECONOMIC HEALTH POLICIES & PROPOSED POLICIES & DESIGNATIONS FOR EMPLOYMENT LANDS – CITY OF TORONTO

PROPOSED OFFICIAL PLAN EMPLOYMENT POLICIES – SEPTEMBER 12, 2013 **COMMENTS & RECOMMENDATIONS**

A. CHAPTER 2 POLICIES	
<p>2. Delete Section 2.2.4 and replace it with the following:</p> <p><u>2.2.4 Employment Areas: Supporting Business and Employment Growth</u></p> <p>Our <i>Employment Areas</i> are finite and geographically bounded. Given relative land values, residential lands are rarely converted to employment uses and there is little opportunity to create new employment lands. It is the City's goal to conserve our <i>Employment Areas</i>, now and in the longer term, to expand existing businesses and incubate and welcome new businesses that will employ future generations of Torontonians. Given the diminishing supply of vacant land in <i>Employment Areas</i>, new development in <i>Employment Areas</i> needs to take place in a more intensive physical form.</p> <p>Maintaining <i>Employment Areas</i> exclusively for business and economic activities provides a stable and productive operating environment for existing business that also attracts new firms. The introduction of sensitive residential or institutional land uses into <i>Employment Areas</i> can force industry to alter their operations, particularly when the environmental certificates that industries operate under are affected, or complaints are lodged about adverse effects from industrial operations. Even where new sensitive land uses are located outside of, but in close proximity to, <i>Employment Areas</i>, they should be designed and constructed to prevent the residents or users and containants from being affected by noise, traffic, odours or other containants from nearby industry.</p> <p>Toronto's <i>Employment Areas</i> are important in providing good quality civic services to our residents and workers. The industrial and commercial properties are vital to maintaining a healthy civic tax base that pays for those services. Most of our City and transportation yards that maintain our civic infrastructure are located in <i>Employment Areas</i> and have limited alternative locations.</p> <p>2. <i>Employment Areas</i> will be used exclusively for business and economic activities in order to:</p> <ul style="list-style-type: none"> a) retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing and warehousing which are permitted only within <i>Employment Areas</i> and <i>Regeneration Areas</i>; b) protect and preserve <i>Employment Areas</i> for current and future business and economic activities; 	<p>The following policy should be revised to read:</p> <p>"Given the diminishing supply of vacant land in <i>Employment Areas</i>, new development in <i>Employment Areas</i> needs to take place in a more intensive physical form, while protecting the interests of existing businesses."</p> <p>The following policy should be revised to read:</p> <p>"Maintaining <i>Employment Areas</i> exclusively for business and economic activities provides a stable and productive operating environment for existing and expanding businesses that also attracts new firms. The introduction of sensitive residential or institutional land uses into <i>Employment Areas</i> can force industry to alter their operations, particularly when the environmental certificates that industries operate under are affected, or complaints are lodged about adverse effects from industrial operations. Even where new sensitive Land uses are located outside of, but in close proximity to, <i>Employment Areas</i>, they should be designed and constructed to prevent the residents or users from being affected by noise, traffic, odours or other containants from nearby industry."</p> <p>Recommend paragraph be re-written to clarify relationships.</p> <p>The timeline 'current and future needs' is good because it allows for a broad time range to support planning justification for a development or redevelopment project, and not just long term.</p> <p>The following policies should be revised to read:</p>

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Proposed text to be added is in bold.

TABLE 1: COMMENTS & RECOMMENDATIONS ON THE PROPOSED ECONOMIC HEALTH POLICIES & PROPOSED POLICIES & DESIGNATIONS FOR EMPLOYMENT LANDS – CITY OF TORONTO

PROPOSED OFFICIAL PLAN EMPLOYMENT POLICIES – SEPTEMBER 12, 2013 COMMENTS & RECOMMENDATIONS

<p>c) provide for and contribute to a broad range of stable full-time employment opportunities;</p> <p>d) provide opportunities for new office buildings, particularly in business parks along the Don Valley corridor and/or within walking distance to higher order transit;</p> <p>e) provide a stable and productive operating environment for existing and new businesses by preventing the establishment of sensitive land uses in <i>Employment Areas</i>.</p> <p>f) maintain and grow the City's business tax base;</p> <p>g) promote and maintain food security for the City's residents;</p> <p>h) maintain the market attractiveness of the <i>Employment Areas</i> for employment uses;</p> <p>i) provide prominent, accessible and visible locations and a wide choice of appropriate sites for potential new businesses;</p> <p>j) continue to contribute to Toronto's diverse economic base and support export oriented wealth creating employment;</p> <p>k) contribute to a balance between jobs and housing to reduce the need for long distance commuting and encourage travel by transit, walking and cycling; and</p> <p>l) provide work opportunities for residents of nearby neighbourhoods.</p>	<p>2. a) retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing, and warehousing and distribution, which are permitted only within <i>Employment Areas</i> and <i>Regeneration Areas</i>;</p> <p>2. m) should be added to read: "Ensure that the necessary infrastructure is provided to support current and future uses."</p>
<p>3. A more intensive use of lands in <i>Employment Areas</i> for business and economic activities will be encouraged to make better use of a limited supply of lands available for these activities.</p>	<p>The following policy should be revised to read: "3. A more intensive use of lands in <i>Employment Areas</i> for business and economic activities will be encouraged to make better use of a limited supply of lands available for these activities, where public services and infrastructure permit."</p>
<p>4. <i>Employment Areas</i> will be enhanced to ensure they are attractive and function well, through actions such as:</p> <p>a) permitting a broad array of economic activities that encourage existing businesses to expand or diversify into new areas of economic activity and facilitates firms with functional linkages to locate in close proximity to one another;</p> <p>b) investing in key infrastructure to support current and future needs, and facilitating investment through special tools, incentives including tax incentives, and other programs or partnerships, in order to:</p> <p>i. Promote the distinctive character or specialized function of an area to attract businesses within a particular targeted cluster of economic activity;</p> <p>ii. Facilitate the development of vacant lands and the adaptive reuse of vacant buildings for employment purposes;</p> <p>iii. Facilitate the remediation of brownfield sites to enable redevelopment for employment uses;</p> <p>iv. Address the absence of key physical infrastructure and amenities for workers; poor environmental conditions or poor accessibility;</p>	<p>The following policy should be revised to read: 4. b) iv. Ensure Address the absence of key physical infrastructure is in place and/or allow the adaptive reuse of</p>

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<p>c) encouraging and supporting business associations that promote and provide a voice for businesses within <i>Employment Areas</i>;</p> <p>d) establishing a connected network of public streets for use by trucks, automobiles, transit, bicycles and pedestrians; and</p> <p>e) promoting a high quality public realm and creating comfortable streets, sidewalks, parks and open spaces for workers and landscaped streetscapes to promote pedestrian/ transit use and attract new business ventures.</p>	<p><i>physical infrastructure to improve environmental conditions or achieve universal accessibility.</i></p>
<p>8. Transit service and use to and from <i>Employment Areas</i> will be enhanced by:</p> <p>a) investing in improved levels of service to <i>Employment Areas</i>, particularly from nearby residential areas and mixed commercial-residential areas;</p> <p>b) encouraging new employment development to take place in a form and density that supports transit and discourages large areas of surface parking;</p> <p>c) creating safe and comfortable pedestrian conditions between places of work and transit stops; and</p> <p>d) encouraging travel demand management measures.</p> <p><u>Conversion and Removal Policies for <i>Employment Areas</i></u></p> <p>12. During a Municipal Comprehensive Review, the City will assess requests to convert lands within <i>Employment Areas</i>, both cumulatively and individually, by considering matters such as whether:</p> <p>a) there is a demonstrated need for the conversion(s) to meet population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;</p> <p>b) the City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;</p> <p>c) there is a demonstrated need for the conversion(s) to mitigate existing and/or potential land use conflicts;</p>	<p>General Recommendation:</p> <p>Phasing is not referenced in any of the proposed Employment Areas policies to assist business investment timing. A policy should be introduced acknowledging that the urban form envisioned by the Plan will take time to realize and therefore development may be phased in a manner that ultimately contributes to the achievement of the City's policies and economic sustainability. It would be necessary for a proponent to demonstrate the importance of phasing in supporting business operations and future development.</p> <p>The following policy should be revised to read:</p> <p>8. b) encouraging new employment development to take place in a form and density that supports transit and discourages large areas of surface parking, where practicable.</p>
<p><u>Conversion and Removal Policies for <i>Employment Areas</i></u></p> <p>12. During a Municipal Comprehensive Review, the City will assess requests to convert lands within <i>Employment Areas</i>, both cumulatively and individually, by considering matters such as whether:</p> <p>a) there is a demonstrated need for the conversion(s) to meet population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;</p> <p>b) the City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;</p> <p>c) there is a demonstrated need for the conversion(s) to mitigate existing and/or potential land use conflicts;</p>	

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PROPOSED OFFICIAL PLAN EMPLOYMENT POLICIES – SEPTEMBER 12, 2013 COMMENTS & RECOMMENDATIONS

<p>d) the lands are required over the long-term for employment purposes;</p> <p>e) the conversion(s) will adversely affect the overall viability of the <i>Employment Area</i> and maintenance of a stable operating environment for business and economic activities with regard to the:</p> <ul style="list-style-type: none"> i. compatibility of the proposed land use with existing employment uses or employment uses permitted in the zoning by-law in the <i>Employment Area</i>; ii. interference with the function of existing employment uses by affecting Environmental Compliance Certificates of industries and their renewal, or complaints of adverse effects to the Ministry of Environment under the Environmental Protection Act which could require changes to industrial operations or restrict operating hours; iii. ability to provide appropriate buffering of employment uses from sensitive residential and institutional uses; iv. implementation of the Ontario Ministry of the Environment D series guidelines for compatibility between industry and sensitive uses or any successor guidelines; v. impact on the affordability of property or building leases or land purchase costs for employment uses and tax assessments in the <i>Employment Area</i>; vi. reduction or elimination of visibility of, and accessibility to, employment lands or uses; vii. impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses; viii. removal of large and/or key locations for employment uses; and ix. maintenance of the identity of the <i>Employment Area</i>. <p>f) the existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s);</p> <p>g) in the instance of conversions for residential purposes, sufficient parks, libraries, recreation centres and schools exist or are planned within walking distance for new residents;</p> <p>h) land already appropriately designated and zoned for the proposed non-employment use(s) is available outside of <i>Employment Areas</i>;</p> <p>i) new residents or institutional users on lands in <i>Employment Areas</i> would be adversely affected by noise, vibration, odours and other air emissions, dust and other particulates or other contaminants;</p> <p>j) the ability to provide opportunities for the clustering of similar or related employment uses is maintained;</p> <p>k) a sufficient supply of optimum-sized land parcels is maintained in the <i>Employment Area</i> for the range of permitted <i>employment uses</i>;</p> <p>l) employment lands proximate to essential linkages, such as supply chains, service providers, markets, and necessary labour pools are preserved;</p>	<p><u>The following policy should be revised to read:</u></p> <p>12. e) iv. implementation of the Ontario Ministry of the Environment D series guidelines for compatibility between industry and sensitive land uses / receptors or any successor guidelines;</p>
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PROPOSED OFFICIAL PLAN EMPLOYMENT POLICIES – SEPTEMBER 12, 2013 COMMENTS & RECOMMENDATIONS

<p>m) employment lands are strategically preserved near important transportation infrastructure such as highways and highway interchanges, rail corridors and airports to facilitate the movement of goods;</p> <p>n) the proposal(s) to convert lands within an <i>Employment Area</i> will maintain and grow, or potentially diminish the City's tax base;</p> <p>o) the proposal(s) to convert lands in an <i>Employment Area</i> will help to maintain to a diverse economic base accommodating and attracting a variety of employment uses and a broad range of stable full-time employment opportunities in Toronto;</p> <p>p) the conversion(s) will retain work opportunities for residents of nearby neighbourhoods; and</p> <p>f) cross-jurisdictional issues have been considered.</p>	
<p>1. CHAPTER 3 POLICIES</p>	
<p>'3.5.1 CREATING A STRONG AND DIVERSE CIVIC ECONOMY</p>	
<p>Toronto's <i>Employment Areas</i> have great potential for additional employment growth through the incubation of new business, the nurturing of small business to become large business, attracting new and expanding employment clusters, and intensifying the form of development in our employment lands. To grow investment employment and investment the Plan promotes, and the City currently provides, both tax incentives and priority processing for new and expanding office buildings and industries. These incentives augment the supports for economic growth in Toronto already provided by: a well-educated and skilled labour force, access to financial capital, a strong research and development sector, advanced communications networks, a dynamic business climate, and an enviable quality of life in safe, congenial and inclusive neighbourhoods.</p>	<p>The following policy should be revised to read: Toronto's <i>Employment Areas</i> have great potential for additional employment growth through the incubation of new business, the nurturing of start-up businesses, and support for a full range of business scales and models, small business-to-become-large-business, attracting new and expanding employment clusters, and intensifying the form and function of development in our employment lands. To grow investment employment and investment the Plan promotes, and the City currently provides, both tax incentives and priority processing for new and expanding office buildings and industries. These incentives augment the supports for economic growth in Toronto already provided by: a well-educated and skilled labour force, access to financial capital, a strong research and development sector, advanced communications networks, a dynamic business climate, and an enviable quality of life in safe, congenial and inclusive neighbourhoods.</p>
<p>3. A balanced growth of jobs and housing across the City will be pursued to:</p> <p>a) maintain a complete community;</p> <p>b) reduce the need for long distance commuting and lessen regional road congestion; and</p> <p>c) increase the proportion of travel by transit, walking and cycling.</p>	<p>The following policy should be revised to read: 3. b) reduce the need for vehicular long-distance commuting and lessen regional road congestion; and</p>

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PROPOSED OFFICIAL PLAN EMPLOYMENT POLICIES – SEPTEMBER 12, 2013 **COMMENTS & RECOMMENDATIONS**

<p>2. CREATING A CULTURAL CAPITAL</p> <p>6. Add a new policy 6 to Section 3.5.2 as follows:</p> <p>'6. Cultural enterprises and employment are significantly clustered within <i>King Spadina Secondary Plan</i> area, <i>King Parliament Secondary Plan</i> area and the <i>Liberty Village Area of the Garrison Common North Secondary Plan</i>. The stock of non-residential floor space in these areas will be preserved and expanded to encourage the continued growth of cultural industries.'</p>	<p>Cultural Enterprises and Employment are also evident in the Carlaw-Dundas Employment Area and the potential opportunity for more exists.</p>
<p>3. CHAPTER 4: EMPLOYMENT POLICIES</p> <p><u>Core Employment Areas</u></p> <p>1. <i>Core Employment Areas</i> are places for business and economic activities. Uses permitted in <i>Core Employment Areas</i> are manufacturing, wholesaling, transportation facilities, offices, research and development facilities, utilities, post-secondary trade schools, media facilities, and vertical agriculture.</p>	<p>The following policy should be revised to read:</p> <p>1. <i>Core Employment Areas</i> are places for business and economic activities. Uses permitted in <i>Core Employment Areas</i> are manufacturing, wholesaling, distribution of goods, transportation facilities, offices, research and development facilities, utilities, post-secondary trade schools, media facilities, and vertical agriculture, and their ancillary uses.</p>
<p><u>Policies for All Employment Areas</u></p> <p>6. Development will contribute to the creation of competitive, attractive, highly functional <i>Employment Areas</i> by:</p> <ul style="list-style-type: none"> a) supporting the existing and planned function of the <i>Employment Area</i>; b) encouraging the establishment of key clusters of economic activity with significant value-added employment and assessment; c) providing a high quality public realm with a connected, easily understood, comfortable and safe network of streets, parks and accessible open spaces; d) integrating the development into the public street network and systems of roads, sidewalks, walkways, bikeways and transit facilities, and establishing new segments where appropriate; e) limiting or mitigating the effects of traffic generated by the development within the <i>Employment Area</i> and adjacent areas; f) providing adequate parking and loading on-site; g) sharing driveways and parking areas wherever possible; h) avoiding parking between the public sidewalk and retail uses; i) mitigating the effects of noise, vibration, dust odours or particulate matter that will be detrimental to other businesses or the amenity of neighbouring areas; j) providing landscaping on the front and any flanking yard adjacent to any public street, park 	<p>Proposed text to be added is in bold.</p>

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TABLE 1: COMMENTS & RECOMMENDATIONS ON THE PROPOSED ECONOMIC HEALTH POLICIES & PROPOSED POLICIES & DESIGNATIONS FOR EMPLOYMENT LANDS – CITY OF TORONTO

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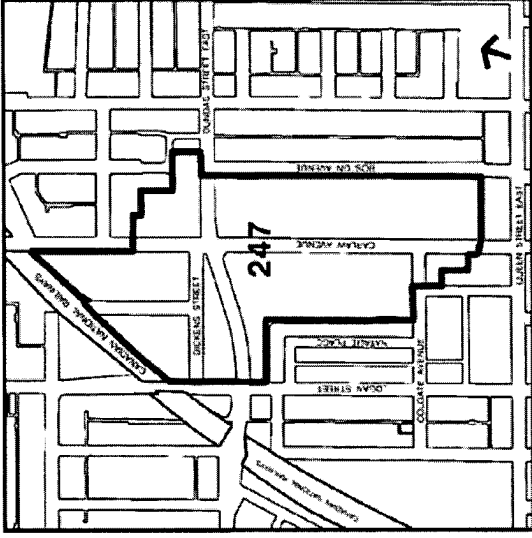
<p>and open space to create an attractive streetscape, and screening parking, loading and service areas;</p> <ul style="list-style-type: none"> k) treating the boundary between Employment Areas and residential lands with landscaping, fencing, or other measures to provide a buffer and minimize adverse impacts; and l) ensuring that where the zoning by-law(s) permit open storage and outdoor processing of goods and materials, the open storage and processing is: <ul style="list-style-type: none"> i. limited in extent; ii. generally located at the rear of the property; iii. well screened by fencing and landscaping where viewed from adjacent streets, highways, parks and neighbouring land uses; and iv. not adversely affecting existing and planned neighbouring land uses in terms of dust, noise and odours. 	<p>The following policy should be revised to read:</p> <ul style="list-style-type: none"> l) ensuring that where the zoning by-law(s) permit open storage and outdoor processing of goods and materials, the open storage and processing is: <ul style="list-style-type: none"> i. Limited in extent to the needs of the business operation in keeping with planned function and the scale of the manufactured product;
<p>10. Amend Maps 13 to 23 inclusive by redesignating all lands shown as <i>Employment Areas</i> to the new designations as shown on the maps appended to this amendment as Appendix 2.</p>	<p>Please refer to our recommendations for the Carlaw Dundas Employment Area, which are modified from <i>Core Employment Areas</i> to <i>General Employment Areas</i>.</p>
<p>11. Add the following sidebar to Section 4.6:</p> <p>'SENSITIVE LAND USES</p> <p>For the purposes of this Plan the term 'Sensitive land uses' shall have the same meaning as in the Provincial Policy Statement. In the Provincial Policy Statement (2005) the term Sensitive land use means: buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more adverse effects, as defined in the Environmental Protection Act, from contaminant discharges generated by a nearby major facility. Sensitive land uses may be a part of the natural or built environment. Examples may include, but are not limited to: residences, day care centres, and educational and health facilities.'</p>	<p>As the PPS, 2005 is currently under review. This policy addition needs to be more flexible to account for possible changes as a result of the PPS review presently underway.</p>

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**TABLE 2: COMMENTS & RECOMMENDATIONS ON THE PROPOSED CITY OF TORONTO OFFICIAL PLAN REVIEW:
AREA SPECIFIC POLICIES FOR THE CARLAW DUNDAS EMPLOYMENT AREA**

PROPOSED OFFICIAL PLAN SITE AND AREA SPECIFIC POLICY NO. 247 COMMENTS & RECOMMENDATIONS

<p>The Area Specific policy No. 247 which will replace No. 154.</p> <p>14. Amend Chapter 7 by adding the following as Site and Area Specific Policy 247:</p> <p>'247. Certain Lands Within the Blocks Bounded by Queen Street East, Boston Avenue, Logan Street and the CN Railway Tracks</p>		<p><u>Comment 1:</u> Given the existing and emerging urban character of this area it is proposed that the land use designation be modified to <i>General Employment Areas</i>.</p> <p><u>Recommendation 1:</u> Recommend revision of Policy 247 a) to read as follows: a) Residential and live/work uses are permitted when located within mixed use buildings that include Core Employment Area General Employment Areas uses provided that:</p>	<p><u>Comment 2:</u> Residential and live/work uses are to locate a minimum of 30 metres from the nearest rail corridor and this affects redevelopment of the Carlaw Industrial Centre property which abuts the CNR, located to the north-west.</p>	<p><u>Recommendation 2:</u> Recommend revision of Policy 247 a) iv. to read as follows: only the residential and/or live/work uses portion of a mixed use building are located a minimum of 30 metres from the nearest rail corridor; and</p>	<p><u>Comment 3:</u> Retail, service and restaurant uses will be permitted to serve residents and/or businesses when they are small in scale and located on Carlaw Avenue and/or Dundas Street. It is not clear what constitutes small in scale, which requires clarification.</p>	<p><u>Recommendation 3:</u> Clarification is required regarding Policy 247 b) to what constitutes "small in scale." Also recommend revision of 247 b) as follows: Despite a) above, retail, service and restaurant uses to serve residents and/or businesses are permitted when they are small in scale and located on Carlaw Avenue, Dickens Street and/or Dundas Street East.</p>	<p><u>Comment 4:</u> The Carlaw / Dundas Neighbourhood Improvement Plan (NIP) of June 2000 recognized change and renewal are ongoing and provide future</p>	<p>a) Residential and live/work uses are permitted when located within mixed use buildings that include <i>Core Employment Area</i> uses, provided that:</p> <ol style="list-style-type: none"> any building containing residential and/or live/work units will provide for a satisfactory living environment compatible with any employment uses in the building and adjacent area; new <i>Core Employment Area</i> uses are restricted to those compatible with residential uses in terms of emissions, odour, noise and generation of traffic; the height, density and massing of new development respects and reinforces the existing and planned physical character of the adjacent area; residential and live/work uses are located a minimum of 30 metres from
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Proposed Text to be added is **Bold**.

**TABLE 2: COMMENTS & RECOMMENDATIONS ON THE PROPOSED CITY OF TORONTO OFFICIAL PLAN REVIEW:
AREA SPECIFIC POLICIES FOR THE CARLAW DUNDAS EMPLOYMENT AREA**

PROPOSED OFFICIAL PLAN SITE AND AREA SPECIFIC POLICY NO. 247 COMMENTS & RECOMMENDATIONS

<p>the nearest rail corridor; and</p> <p>v. non-residential gross floor area existing on [approval date] or developed subsequently is replaced with any new development.</p> <p>b) Despite a) above, retail, service and restaurant uses to serve residents and/or businesses are permitted when they are small in scale and located on Carlaw Avenue and/or Dundas Street East.</p>	<p>opportunities to achieve City building goals and objectives. The most significant conclusion reached in the Improvement Plan was the principle of maintaining the existing mixed use industrial and residential character, affordability, and improved stability, through the reuse of existing buildings to preserve the Heritage/Historical structures. As a result, residential and live/work uses are permitted when located within mixed use buildings that include <i>Core Employment Areas</i> uses. Notwithstanding the Employment Areas designation, the character of this area is described as a re-urbanizing avenue or corridor. Although City Staff propose to eliminate <i>Avenues</i> from all <i>Employment Areas</i>, Carlaw Avenue, between Gerrard Street East and Queen Street East (both Urban Structure: Avenues) exhibit the urban characteristics of an Avenue and ought to be considered as such in its urban context. This Avenue or corridor will also link the Gerrard Street East and Queen Street East Avenues. The June 2000 Improvement Plan contributes to this objective and a future Avenue Study will contribute to continued growth and redevelopment. As well, given the urban character of this area it is proposed that the land use designation be modified to <i>General Employment Areas</i>.</p> <p>Recommendation 4: The City designate the section of Carlaw Avenue between Gerrard Street East and Queen Street East, and Dundas Street East in this Employment Areas as “Avenues”.</p> <p>Recommendation 5: Add Policy 247 c) which reads as follows: In support of the City’s effort to create cultural capital, cultural industries will be encouraged given their potential for wealth and job creation where they are complementary and compatible to the character of this area.</p>
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Proposed Text to be added is **Bold**.

Image 1 - Community Context - Urban Structure: Avenues for Carlaw Avenue & Dundas Street East



Subject Sites



Carlaw Industrial Centre

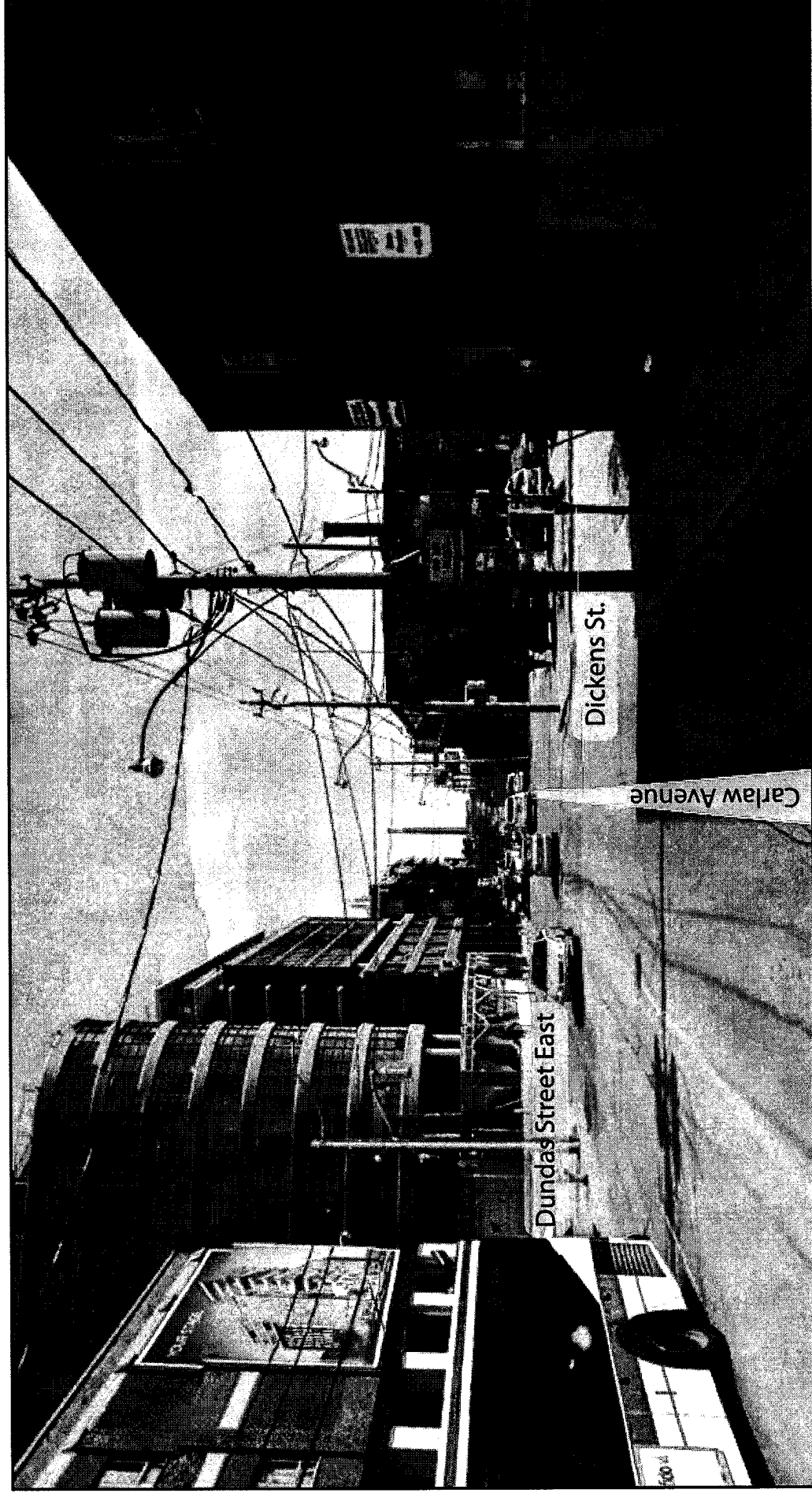
Proposed Avenue

Existing Avenues per City of Toronto
Official Plan & Official Plan Review, 2013

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1742_image1_Sep124.13

Image 2 - South View along Carlaw Avenue at Dundas Street East
Image Date: May 2012

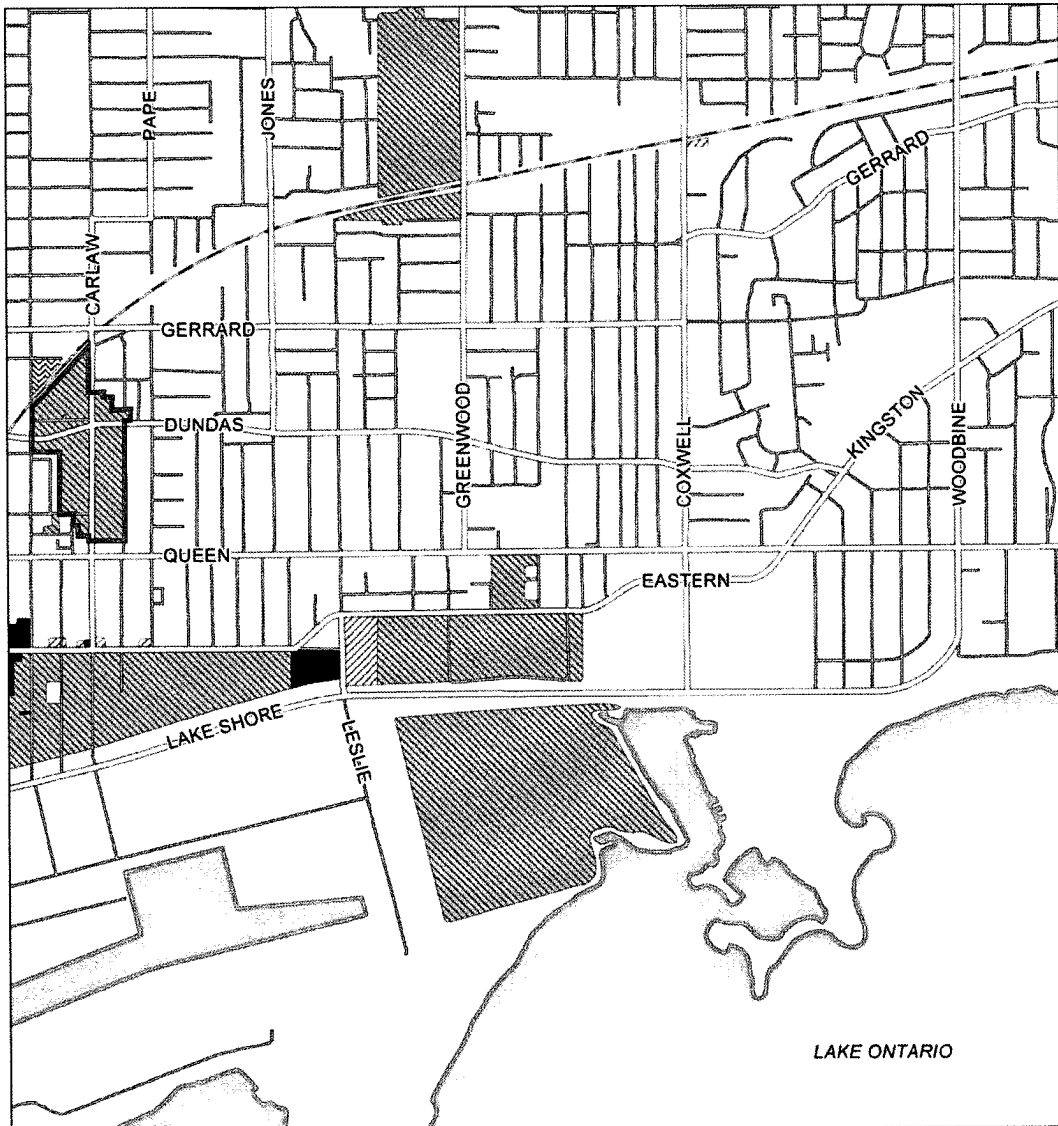


1742_Image2_Sept.30.13

Source: Google Earth

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Figure 1
 Proposed Recognition of the Carlaw Dundas Employment Area as
 "General Employment Areas" based on Community Context



Toronto City Planning

Redesignate from 'Employment Areas' to Official Plan
 Designations Shown on Maps 1 to 48 inclusive

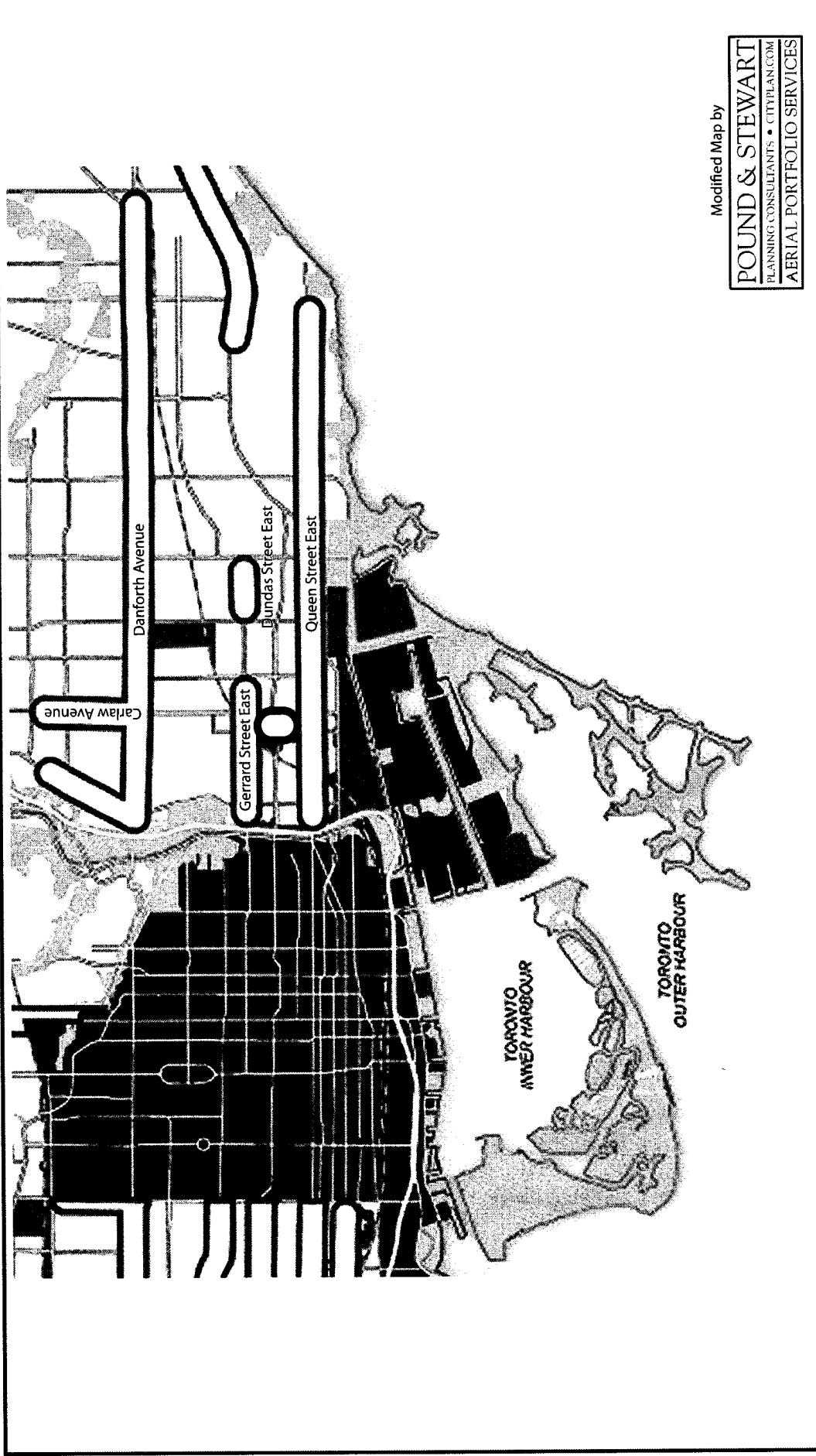
Map 45

Neighbourhoods	Parks & Open Space Areas	Employment Areas	Utility Corridors
Apartment Neighbourhoods	Natural Areas	Core Employment Areas	Conversion Requests/Applications
Mixed Use Areas	Parks	General Employment Areas	Subject to Area Study
Regeneration Areas			

↑
 Not to Scale
 07/25/2013

Proposed area to be recognized as "General Employment Areas" based on community context.

Figure 2



Modified Map by
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<p>Toronto City Planning Division</p>	<p>Toronto Official Plan Urban Structure APPENDIX 1 July 25, 2013</p>
<p>Avenues</p> <ul style="list-style-type: none"> <input type="checkbox"/> Avenues <input type="checkbox"/> Centres <input type="checkbox"/> Employment Areas <input type="checkbox"/> Downtown and Central Waterfront 	<p>Green Space System</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proposed Avenues (Carlaw Avenue & Dundas Street East between Queen Street East and Gerrard Street East)
<p>North Star</p>	