



STAFF REPORT ACTION REQUIRED

Official Plan/Municipal Comprehensive Reviews: Results of Public Consultations on Draft Policies and Designations for Economic Health and Employment Lands

Date:	April 23, 2013
To:	Planning and Growth Management Committee
From:	Chief Planner and Executive Director, City Planning Division
Wards:	All
Reference Number:	P:\2013\Cluster B\PLN\PGMC\PG13035

SUMMARY

This report summarizes the results of the public consultations on the draft policies for economic health and employment lands, the designations and mapping of employment areas which took place over the last four months. The report also outlines potential changes in policy direction resulting from the consultations.

Consultation participants were for the most part supportive of the draft policies to preserve the employment lands for employment purposes, and the policies to promote new office development on rapid transit.

As a result of the consultation input and further research carried out by staff, it is recommended that the draft 'General Employment Area' and 'Retail Employment Area' designations be consolidated and geographically refined to provide for a full range and scale of retail uses. The consultations also point to further research work required to be undertaken with respect to sensitive uses in employment areas. Additional work is required to address two key matters. The first relates to additional work to refine the policy requiring a net gain of employment space for residential developments on office building sites in the Downtown, Centres and within walking distance of a rapid transit station. The second being the need to refine the emerging policy direction where it is recommended residential be supported in conjunction with employment to ensure lands will not be subject to conversion until consideration by council through subsequent Municipal Comprehensive Reviews.

RECOMMENDATIONS

The City Planning Division recommends that:

1. Council endorse staff development of two, rather than three, employment area designations through the consolidation of the draft 'General Employment Area' and 'Retail Employment Area' designations into one designation and refinement of the depth to which this designation could apply and the associated policies.
2. Council direct staff to investigate policy approaches to address the impact of non-residential sensitive uses in employment areas to report back to the September meeting of Planning and Growth Management Committee.
3. Council direct staff to refine the policy of net gain of non-residential space in residential redevelopments in the Downtown, Centres and within walking distance of rapid transit stations to office buildings.
4. Council direct staff to consider and integrate within the draft policies the recommendations of the Province, appended as Attachment 2 to this report.
5. Council receive the Consultant's summary report appended as Attachment 1 to this report.

Financial Impact

The recommendations in this report have no financial impact.

DECISION HISTORY

On November 27, 28 and 29, 2012 Council considered the report from the Chief Planner and Executive Director entitled, 'Planning for a Strong and Diverse Economy: Official Plan/Municipal Comprehensive Reviews—Draft Policies and Designations for Employment'. The City Planning staff report can be found at:

<http://www.toronto.ca/legdocs/mmis/2012/pg/bgrd/backgroundfile-51493.pdf> (Part 1)

<http://www.toronto.ca/legdocs/mmis/2012/pg/bgrd/backgroundfile-51834.pdf> (Part 2)

Among its actions, Council adopted the recommendations that the draft employment policies, designations, mapping of designations and preliminary assessments for requests to convert employment lands be the basis of public consultations.

Council directed the Chief Planner to conduct open houses in each Community Council district and to meet with key stakeholders to obtain comments and feedback regarding the proposed policies, designation mapping and preliminary assessments for requests/applications to convert employment lands. This report summarizes the results of the consultations.

Consultation Process

In January, 2013 staff from the City Planning and Economic Development, Culture and Tourism Divisions and consultation facilitators retained by City Planning, commenced the public consultations by meeting with the following groups and organizations to hear their views on the draft policies, designations and preliminary assessments of conversion requests:

- Building Industry and Land Development Association (BILD)
- Toronto and York Region Labour Council
- The Toronto Industry Network
- The Toronto and Region Board of Trade
- National Association of Industrial Office Properties (NAIOP)
- Society of Industrial Office Properties (SIOP) Toronto East, West and North CAER Associations (representatives of chemical industries)
- Toronto Association of Business Improvement Areas (TABIA)
- South Etobicoke Industrial Employers Association
- Leaside Business Park Association
- A broad range of Faith Groups

The format of the meetings included an overview presentation of the draft policies, questions, answers and discussion of the draft policies and designations. An additional roundtable meeting was held in the first week of March, 2013 with representatives of City departments and divisions to discuss the draft employment policies and designations.

In February 2013, 7 public open houses were held across Toronto. In Etobicoke, Scarborough and North York two consultations sessions were held in each area, one in the afternoon and one in the evening. One consultation session was held at City Hall in the early evening and was web broadcast. All sessions were scheduled to provide flexibility for interested members of the public to attend. Advertisements for the Open Houses were placed on-line on Spacing's website, in print in the Globe and Mail and through thousands of mailed and e-mailed invitations as well as almost 4000 e-mail updates sent to members of the public who had signed up to receive them.

Each attendee received a discussion guide containing the draft policies and questionnaire feedback sheets, and an opportunity to review display boards and to ask questions of City Planning and Economic Development Culture and Tourism Division staff in attendance. Following a staff presentation, an opportunity was provided to the public to ask questions, following which attendees were divided into discussion groups. The discussion groups subsequently reported out on the strengths and flaws of the draft policies and suggested changes. The format of the Open House held in the Toronto Council Chambers did not feature discussion groups as this session was live streamed on the Rogers website. Approximately 170 members of the public attended the Open Houses.

For those unable to attend the open houses, a dedicated webpage was created for the employment lands consultations that included a video of the presentation given at the open houses, the background reports, as well as the draft policies and mapping. There were over 3300 visits to this webpage in February and the first half of March 2013.

In addition to the public consultations, numerous letters and e-mails were received, primarily from solicitors, developers and planners. Staff from the City Planning Division and Economic Development, Culture and Tourism Division held multiple meetings with representatives of the Ministry of Municipal Affairs and Housing (MMAH) and Ministry of the Environment (MOE) and are in receipt of correspondence from the MMAH providing input on matters relevant to the Review.

The Draft Employment Designations

Throughout the consultations there was consensus that the City's current employment area policies and designations needed clarification regarding what uses were permitted in which areas and under what conditions. There was strong support for having more than one employment area designation rather than a 'one size fits all' designation.

1. The Core Employment Area Designation

There was clear and strong support for a 'core' employment area designation occupying approximately 80 per cent of the employment lands dedicated primarily to employment uses such as office, manufacturing/warehousing, and wholesaling. There were some dissenting voices from some industry representatives who supported an industrial designation where office would not be permitted, also concern that office uses would raise land values and inhibit the expansion of manufacturing. However, as offices are the largest employers in the City's Employment Areas, and since many professional offices support industry, staff recommend that office uses continue to be permitted in the Core Employment Areas.

The issue was also raised whether full-service automobile dealerships which may be significant employers would also be permitted uses in 'Core Employment Areas'. The Toronto Industrial Network also raised the point that it was unclear whether the term 'Core' described the geographical location of the designation or simply the function of the uses permitted.

2. The General Employment Area and Retail Employment Area Designations

Twenty per cent of the employment lands were presented as possibly being designated as either 'General Employment Area' or 'Retail Employment Area' which would permit all the uses permitted in the 'Core Employment Area' designation and additional uses such as retail stores, places of worship, recreation and entertainment uses, restaurants and branches of post-secondary colleges and universities. These draft designations were generally proposed on major roads at the periphery of

employment areas. There was general acceptance in the consultations that retail uses provide employment, and should be permitted on the periphery of employment areas. Retail uses are not considered to be a 'sensitive use' that would alter the environmental certificates or hours of operation of nearby industrial uses and would provide nearby services, food and goods for industrial and office workers. Retail uses on the periphery of employment areas also serve as a buffer between industrial uses in the interior and sensitive uses such as residences beyond the employment lands. Several participants, particularly from the Business Improvement Areas expressed concern that the proliferation of large-scale retail establishments on the edge of Employment Areas could undermine more traditional retail areas nearby.

There are nominal differences between the two draft designations. The 'General Employment Area' and 'Retail Employment Area' differ in that the 'General Employment Area' designation permits only stand-alone large scale retail uses over 60,000 square feet and power centres while the latter designation permits retail uses of every form and scale. Stakeholder feedback, discussions with, and letters, from the development community suggested that the impact of the same square footage of retail use is similar regardless of whether the retail complex includes a single large-scale store or a grouping of medium and smaller scale retail stores. Staff find this line of argument compelling. There is considerable merit for merging the designations into one designation that would permit retail uses of every scale and form. There was a general consensus that it would be simpler and clearer to have two designations for employment lands. The 'Core Employment Area' would occupy most of the employment lands and would only permit offices, manufacturing, warehousing, wholesaling and other primary employment uses. The second combined designation, largely located at the periphery of the employment areas near major roads would comprise employment lands also and permit, as well as the primary industrial and office uses, retail uses of any form or scale.

Planning staff examined 2012 data from the Centre for the Study of Commercial Activity (CSCA) and mapped it into 2 possible designations. A 'General Employment Area' designation that combined the draft 'Retail' and 'General' Employment Area designations would contain all 27 of the Big Box stores over 6,000 square metres in size within Employment Areas, 13 of the 14 Power Centres in Employment Areas, and 66 of the 73 shopping centres in Employment Areas. The permission for power centres and shopping centres in the 'Core Employment Areas' should be revisited to see whether the designation of these sites should be changed, or whether these existing retail uses should simply be 'grandfathered' in 'Core Employment Areas'. The profile of existing 2012 uses in a combined 'General' and 'Retail' Employment Area designation shows that 78 per cent of establishments and 74 per cent of jobs would be found in the retail, service and office sectors. Only 10 per cent of establishments and 14 per cent of jobs would be in the manufacturing and warehousing sector. The combined designation would house most of the retail establishments and employment in employment lands and very little of the manufacturing base. The opportunity would also exist to establish new retail

complexes in the 'combined' designation to contribute to the City's future retail sector growth. Staff re-examined the current use of lands that would be located in a draft Official Plan designation that combined the lands in the draft 'General' and 'Retail' Employment Area designations. Almost 90 per cent of manufacturing and warehousing would continue to be located in the 'Core Employment Area' designation. Although permitted in the employment lands that would comprise the new combined designation, only 10 per cent of manufacturing and warehousing would be located there. Staff will review the impacts of the combination of these two designations. Depth of the designation will be a key issue to be reviewed when staff look at combining the two designations.

Staff have received numerous letters from property owners requesting that their lands be changed from one draft employment area designation to another. These requests will be reviewed in the context of any revised employment area designations and reported out to the statutory special public meeting in November 2013.

3. Consideration of Major Retail Establishments

In the draft policies for Employment Areas, major retail uses were considered to be large stand alone retail stores, with greater than 6,000 square metres of floor space, or a power centre which was a retail complex that included a large stand alone retail store greater than 6,000 square metres in size. These were proposed to be considered in either a 'General Employment Area' or 'Retail Employment Area' by way of a zoning by-law amendment provided certain criteria were met to the satisfaction of the City. The 6,000 square metre threshold was based on existing floor plates of 'big box' stores. There was no suggestion in the consultations that major retail permissions be extended to the draft 'Core Employment Area' lands, only that existing retail complexes in the draft Core Employment Area be recognized either through redesignation or grandfathering.

If the two designations are combined into a single employment area designation permitting retail uses of any form or scale, it is at least in part because it has been accepted that a large retail store has similar transportation and market impacts regardless as a grouping of several smaller stores with the same gross floor area. It is therefore being proposed to proceed by way of a zoning by-law amendment and the criteria for consideration of the zoning application would apply to all retail complexes of 6,000 square metres or more regardless of whether the complex contained a large stand-alone retail store or a collection of medium and smaller size stores.

There was general support for intensification of the use of the City's employment lands given that they are limited in size, geographically bounded and need to accommodate future employment growth for a growing population. Several development industry representatives expressed the opinion that the criteria that large retail complexes be multi-storey and have parking structures should not be applied to the outer areas of the City, particularly on the edge of employment areas in

Scarborough. The comment was also received that the draft Section 3.5 policies setting out design goals for retail on large sites to promote street-related retail and pedestrian and transit use were not sufficiently clear what would constitute a 'large site' as a 'large site' is not defined or easily understood. Staff will be clarifying this policy.

4. Conversion Requests and Conversion Policies

There was strong support to retain and preserve employment lands and to refuse most conversion requests to convert employment lands for residential purposes. The exception being landowners/agents who made such conversion requests.

Representatives of the Labour movement attended all open houses and were concerned about the impact of residential conversions upon industrial jobs and the maintenance of a diverse economic base in Toronto. Industrialists and industrial interest groups were very concerned that the introduction of sensitive uses, especially residential uses, into employment areas would result in future complaints to the Ministry of Environment of adverse effects under the Environmental Protection Act, and affect the operations of existing businesses and undermine the future viability of these employment areas.

Staff investigated the industries' concerns with the Ministry of the Environment who confirmed that when a complaint of an adverse noise, vibration, lighting or odour impact is made by a resident, parishioner or school parent for example there is an obligation under the Environmental Protection Act for the Ministry to investigate and, if verified, to order the source of the impact to mitigate at the source (usually noise, dust or odour). This is the case even if the resident recently moved in and the industry has been there for a century. This applies even in the circumstance where a warning clause of the existence of the industry is included in the agreement of purchase and sale of the residential unit. The concern of industry that the conversion requests will have the potential to negatively impact their operations clearly has validity.

Industrial groups such as the South Etobicoke Industrial Employers Association expressed concern about the large number of conversion requests along major highways and particularly near ramps, as these sites are necessary for businesses that rely on trucking for the movement of goods and provide visibility for businesses, while at the same time needing noise and air quality mitigation for residential uses. The Province was also concerned that lands in the vicinity of major transportation infrastructure be designated and protected for employment uses and recommended the inclusion of additional policies to address this concern.

Commentary through the stakeholder meetings and open houses expressed concern that the policies were not clear as to whether, once the new Official Plan designations were in force, a change from a 'Core Employment Area' designation to a 'General or

Retail Employment Area designation would constitute a conversion of employment lands under the Provincial land use framework. Staff will be developing a conversion policy to protect lands in Core Employment Areas and General Employment Areas from conversion to non-employment uses except by way of a Municipal Comprehensive Review. The Province concurs with staff's direction and raised the point that the lack of such a policy may threaten the supply of Core Employment Area lands which represent approximately 80 per cent of the total lands proposed to be used for employment uses and which are to be preserved for traditional industrial uses. Staff will also be developing a policy or definition for 'conversion' to address limiting redesignations between the proposed two Employment Areas outside of the Five-Year Official Plan Review or Municipal Comprehensive Review. Staff will be revising the policies to ensure that the Official Plan conversion policies are sufficiently precise to clearly bring into place the Planning Act provisions to remove an applicant's right of appeal to the OMB when Council refuses an application to remove land from an area of employment.

Wording along the following lines will be developed by staff to clearly express Council's intent that conversions would mean a designation from an Employment Area designation to another designation or to another sub-employment area designation or the introduction of a use that is otherwise not permitted in the designations.

5. Sensitive Non-Residential Uses in an Employment Area

The most contentious issue arising from the public consultation are questions surrounding the permissions for non-residential sensitive uses in the draft 'General Employment Area' and 'Retail Employment Area'. The Provincial D-6 Guidelines for Compatibility between Industrial Facilities and Sensitive land uses, regard residential land uses as sensitive 24 hours a day. However, the Guidelines also define a sensitive use as any building or amenity area which is not directly associated with the industrial use, where humans or the natural environment may be adversely affected by emissions generated by the operation of a nearby industrial facility. Examples of sensitive uses in Section 1.2.1 of the D-6 Provincial Guideline include residences, senior citizen homes, schools, day care facilities, hospitals, places of worship and other similar institutional uses. The Provincial Policy Statement 2005 contains a similar definition that uses as examples: residences, day care centres and educational and health facilities.

In the early 1990's, in response to vacancies in industrial areas in the midst of an economic recession, some former municipalities amended their Official Plans and Zoning By-laws to permit places of worship, schools and recreational facilities. The Official Plan for the amalgamated City prohibited schools and limited places of worship and recreational facilities to major roads within employment areas. Notwithstanding the policy direction, the zoning by-law permissions from the former municipalities have resulted in the proliferation of these uses within employment

areas. Between 2002 and 2012 the number of places of worship in employment areas almost doubled from 216 to 414. In the same period the number of recreation uses in employment areas grew from 121 in 2002 to 253 in 2012. In the draft Official Plan policies for employment areas, places of worship, entertainment and recreation uses and post-secondary Colleges and Universities were shown as permitted uses in the draft 'General Employment Area' and 'Retail Employment Area' designations. The Provincial planning framework does not directly account for these uses in its definition of employment area, and continuing to permit these sensitive uses in employment areas could undermine the City's ability to protect its employment lands.

Industrial employers have serious concerns with permitting sensitive non-residential uses on lands within two of the three draft employment area designations. Many employers pointed out that worshippers at places of worship or school parents are affecting their operations both through complaints to the Ministry of Environment of adverse affects under the Environmental Assessment Act and the need to account for these sensitive uses when obtaining environmental certificates for their businesses. In one stakeholder meeting, industrial representatives pointed out that noise complaints from places of worship were of particular concern since noise is measured at the receptor site and the City's Noise By-law specifically prohibits disturbing religious services. Stakeholders representing faith groups expressed their preference to see moderate expansions to the draft permissions for places of worship in employment areas including the grandfathering of existing places of worship in 'Core Employment Areas' and permissions for places of worship in business parks.

Concern regarding permission for daycares in employment areas has also been raised. The draft policies would permit only workplace daycare that is ancillary to an employment use. One submission noted that commercial day nurseries should be permitted in an employment area to serve employees of area businesses and their prohibition in the draft employment area designations is an undue and unnecessary restriction. Representatives of industry recognize that day nurseries are a sensitive land use that would also have to be accounted for in the environmental certificates of area industries and which could potentially be the source of complaints and operational limitations for area industries.

The Province has expressed concerns about permissions for non-residential sensitive uses in employment areas, advising that 'allowing sensitive land uses within designated Employment Areas in the Official Plan has the potential to compromise the suitability of surrounding land for employment uses that require separation and impact this limited land supply.' In light of the concerns expressed and the possible impact on the Employment Areas, City Planning staff will be giving further consideration to these uses to ensure that there are no adverse effect on the principal employment uses in the Employment Areas. Additional review and research will be conducted in order to finalize staff's recommendations on such uses within any of the employment designations. The Province has suggested the best practice would be the outright prohibition of new places of worship, recreation and entertainment uses and post-

secondary colleges and universities in all of the employment areas. As places of worship are provided for by the Official Plan in virtually all of the City outside of parks, utility corridors and employment areas, ample opportunities would remain for faith groups to establish.

Alternatively, a policy approach must be developed to assess and establish conditions and criteria for these non-residential sensitive uses to ensure that bona fide employment uses in Employment Areas can be protected. One alternative to outright prohibition of places of worship, recreation and entertainment uses and post-secondary colleges and universities may be the requirement for a 'sensitive land use compatibility study'. These non-residential sensitive uses could be permitted by way of a zoning by-law amendment where it can be demonstrated that the sensitive land use would not affect normal business activities of employment uses within 1000 metres, the maximum buffer distance under Provincial guidelines. The study would also evaluate if the sensitive use would be subject to adverse effects from noise, vibrations, lighting, odour or other emissions from employment uses within 1000 metres of their proposed site, and the study would have to be to the satisfaction of an agency that had the capability of professionally evaluating it.

There are other issues related to permitting sensitive uses in employment areas. The inclusion of these sensitive uses could possibly undermine the City's ability to use Planning Act provisions that limit appeals to the OMB of Council's refusal of conversion applications. The Planning Act provision limiting appeal rights only applies to lands that meet the Planning Act definition of an 'area of employment' which is an area designated in an Official Plan for clusters of business and economic uses including manufacturing, warehousing, and office uses and associated retail uses.

The Province has commented that it is unclear whether some of the uses contemplated in the draft policies for 'General Employment Areas' and 'Retail Employment Areas' meet the Planning Act definition of an 'area of employment', and as a result the City may not be able to rely on the Planning Act provisions that limit appeal rights for removal of land from employment areas. Legal Services staff are investigating the potential implications of permitting non-residential sensitive uses in some employment area designations.

Section 2.2.6.5 of the Provincial Growth Plan for the Greater Golden Horseshoe permits the conversion of lands within 'employment areas' to non-employment uses only during a Municipal Comprehensive Review where certain criteria are met. The definition of an 'employment area' in the Provincial Growth Plan is an area 'designated in an Official Plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices and associated retail and ancillary facilities'. The Provincial Policy Statement employs the same definition. Consultants representing landowners who are seeking conversions have made arguments that their client's lands are not really clusters of such businesses or

within an 'area of employment' as defined and therefore the Provincial conversion limitations should not apply. Staff need to be convinced that the inclusion of places of worship, recreation and entertainment facilities and colleges and universities will be in keeping with the Growth Plan and allow designated Employment Areas to meet the definition of 'area of employment' as set out in both the Growth Plan and in the Provincial Policy Statement before final recommendations with respect to these uses are brought forward.

The Province has also recommended that the definition of 'sensitive land uses' contained in the Provincial Policy Statement be embedded in the Official Plan.

6. The Promotion and Retention of Office Development in Transit-rich Areas

There was strong support for the policies promoting new office developments in transit-rich areas in the Downtown and Central Waterfront, the four Centres and within walking distance of rapid transit stations. This was seen as a desirable alternative to new office space in an automobile-dependant location. Participants in the open houses commented about the need to provide for minimum standards of office space in new development in the Yonge-Eglinton and North York Centres to ensure that these areas continued to be a focus of both residences and jobs.

Draft policy 3.5.1.6 calls for the promotion of office development in transit rich areas such as the Downtown, the Centres and within walking distance of rapid transit stations. The Province has suggested that a policy be added that specifically directs 'Major Office Growth' to these areas. 'Major Office' is defined in the Growth Plan of office buildings with 10,000 sq.m. or more of space or with 500 or more jobs.' Inclusion of such a policy would help direct large new office complexes to mixed use or Employment Areas well served by the rapid transit network.

There was considerable discussion of the draft policy that required residential development on a site with more than 100 square metres of non-residential floor space to also increase the non-residential floor space if the site is in the transit served Downtown or Centres, or within walking distance of a rapid transit station. The policy also provided the flexibility of off-site office replacement within the same area. With the exception of the Building Industry and Land Development Association (BILD), there was general support for a policy that sought to ensure that residential intensification did not displace office space in selected transit-rich areas. However, even many of those who supported the concept, took issue with the specifics of the draft policy. There were comments that the term 'within walking distance' needed to be replaced by a specific distance from the rapid transit station. Others commented that if the intention was to prevent the loss of office space in the Downtown, the Centres and at rapid transit stations, then the threshold for application of 100 square metres was too low, and should be raised to reflect existing significant office space in these areas.

The stakeholder meeting with BILD was largely focussed on this policy. BILD representatives were concerned that this policy represented over-regulation and that office space would be built if, and where, there was a market for office space. BILD representatives pointed out that there were different markets, marketing and site requirements for residential and office buildings and that obstacles existed to combining office and residential uses in the same building. BILD suggested that rather than requiring 'replacement' office space when residential condos were constructed on sites with office buildings in the selected transit rich areas, that the inclusion of replacement office should simply be encouraged and that incentives be offered to accomplish this. The Tax Increment Equivalent Grants for the construction of office buildings as part of the IMIT program was extended to the office portion of buildings that contained a mix of office and residential uses.

The response to the policy of requiring a net gain of employment space on-site or in the area when residential development is taking place on a site with employment space in selected transit-rich areas, points to the need for additional work and investigation. As the overall intent of the policy was to prevent the loss of office buildings near rapid transit as a result of residential intensification, the policy should focus on residential redevelopment of office buildings in the Downtown, Centres and within walking distance of a rapid transit station. Research is required to determine the size distribution of these office buildings to put forward a higher square footage threshold to trigger the policy. Walking distance from a rapid transit station should be defined and, in keeping with the Provincial policy framework and feedback from the consultations a distance of 800 metres is suggested. Clarification is also required that the policy would only apply on lands designated as 'Mixed Use Areas' and 'Regeneration Areas', to make it clear that high density mixed use developments are not being encouraged in low-rise neighbourhoods or Employment Areas. Once the size threshold is determined and walking distance is defined, research should be undertaken to determine how many properties would be affected, their cumulative square footage and the employment found within them.

Replacement of retail gross floor area was addressed by Council in OPA 94, which is still under appeal and before the Ontario Municipal Board. This draft policy is different than the net gain of office policy discussed above, in that it is applicable citywide, not just in selected transit-rich locations, and it provides that retail space should be considered rather than required. This policy approach will be included in the draft OPA to the special statutory meeting in November 2013.

7. Other Significant Comments Arising from the Consultation

a) Lack of a Equity Focus in the draft Employment Policies

Several participants at the February 27th City Hall Open House and a detailed submission from the Toronto Women's City Alliance (TWCA) were critical of the draft policies for Economic Health and Employment Areas insofar as they lacked

a focus on equity. TWCA is concerned that the policies are silent about income polarization, immigrants, racialized youth, persons with disabilities, caregivers, single parents and women in all of these groups. The TWCA suggested that the aim of the policies should be to ensure that Torontonians of all backgrounds can earn a living, particularly those persons who are on the margins. The TWCA also submitted that the report does not account for employment trends such as outsourcing, new technology, on-line shopping and incubator enterprises in people's homes. While the background research did establish the close live-work relationship between employment areas and the residential neighbourhoods surrounding them, there is no data on and was no analysis of, the race, gender or age of the workers in each of the employment areas of the City. While these are all important considerations for the City they are not matters that would be reflected in Official Plan policies.

b) Removal of Avenues Overlay from Employment Areas

The draft policies included the removal of the Avenues overlay from Employment Areas, as the Avenue overlay has been interpreted as permitting residential uses on lands designated as Employment Areas. The removal of the Avenues overlay from employment lands was generally supported to clarify these lands are intended for employment purposes. Many participants, particularly industrial participants, were concerned that the introduction of sensitive residential uses at the edge of employment areas would compromise the operations of nearby industry.

c) Relationship of the Employment Policies and Transportation Corridor Intensification Studies

The issue arose as to the future use of employment lands along the routes of the Council-approved Sheppard East and Finch West LRT corridors at the open houses. Just as the City is currently undertaking an intensification corridor study for the Eglinton LRT route, future land use studies will be undertaken along the Sheppard East and Finch West LRT routes. Should the timing of these studies not coincide with a Municipal Comprehensive Review, it would be difficult to bring into force policies to permit more intensive mixed commercial-residential use at stations in employment lands, should Council so determine upon conclusion of those studies. The Sheppard East BIA went so far as to recommend the lands in their area be redesignated to Mixed Use Area even before the corridor study is undertaken. Staff will be considering a policy to address this matter.

NEXT STEPS

Additional research to refine policies dealing with sensitive uses in employment areas, and to refine the applicability of policies to require a net gain of employment floor space when residential intensification occurs on an office building site in the Downtown, Centres and within walking distance of a rapid transit station is required. Staff have commenced work related to these important areas of review.

Further refinement of a combined General Employment and Retail Employment designation will occur and will include a review of the depth of this designation among other matters. Staff will continue to review the submissions pertaining to which employment area designations lands should be shown on the land use maps and will report out to the statutory public meeting at Planning and Growth Management Committee on recommendations related to the requests. Further refinement will occur with respect to the provision of a policy framework where staff is recommending the conversion of lands for residential purposes in order to protect further conversion of these lands.

Staff will be revising the draft policies and a revised draft OPA for economic health and the employment lands will be presented to the September 12, 2013 meeting of Planning and Growth Management Committee. Subsequently, these policies will be considered at a statutory citywide open house prior to the statutory special public meeting targeted for November of this year. Requests/applications for the conversion of employment lands received prior to and including May 31, 2013 will also be the subject of staff evaluation as part of the City's Municipal Comprehensive Review and the final recommendations will be presented to the statutory special public meeting in November 2013.

CONTACT

Kerri A. Voumvakis, Director
Strategic Initiatives, Policy & Analysis
City Planning Division
Tel: 416-392-8148
Fax: 416-392-3821
Email: kvoumva@toronto.ca

Paul Bain, Project Manager
Strategic Initiatives, Policy & Analysis
City Planning Division
Tel: 416-392-8781
Fax: 416-392-3821
Email: pbain@toronto.ca

SIGNATURE

Jennifer Keesmaat, M.E.S, MCIP, RPP
Chief Planner & Executive Director
City Planning Division

ATTACHMENTS

Attachment 1: Employment Policies: Consultation Summary Report, March 2013
Attachment 2: Letter from Ministry of Municipal Affairs and Housing, March 27, 2013

[p:\2013\ClusterB\PLN\PG13035]

Welcome



Official Plan Review – Employment Lands Consultations

Afternoon
Session

Agenda

Evening
Session

Open House

6:30 p.m.

Welcome & Introductions

7:00 p.m.

Overview Presentation

City of Toronto planning staff will provide an overview of
Toronto's economic health and draft policy changes.

7:10 p.m.

Questions of Clarification

7:30 p.m.

Discussion

The following questions will help guide the conversation:
What are the strengths of the draft policy changes regarding
employment lands?
What concerns (if any) do you have with the draft
plan?

7:45 p.m.

8:50 p.m.

City of Toronto Official Plan 5-Year Review/
Municipal Comprehensive Review, Economic Health and
Employment Policies – Consultation Summary Report
March 2013



This summary report was prepared by Lura Consulting. Lura is providing third-party consultation management services for the employment lands consultations as part of the City of Toronto's Five-Year Official Plan Review. This summary report captures the feedback received during the consultations on employment uses policies undertaken by the City between January and March 2013. If you have any questions or comments regarding the summary, please contact:

Paul Bain
Project Manager, Official Plan
Review
City of Toronto
pbain@toronto.ca
416-392-8781

David Dilks
Consultation Project Lead
Lura Consulting
ddilks@lura.ca
416-536-1729



Table of Contents

Executive Summary	2
1. Introduction	6
2. Consultation Process Overview	8
3. Key Feedback Themes.....	14
4. Summary of Suggested Policy Changes	19
5. Next Steps	22

Appendix A – Communication and Promotional Materials

Appendix B – Consultation Resources

Appendix C – Stakeholder Meeting Summaries

Appendix D – Public Open House Meeting Summaries



Executive Summary

The City of Toronto is reviewing its Official Plan policies as required by the Planning Act at least every five years. The Planning Act specifically requires that the Official Plan Review deal with the policies and designations for areas of employment. This review is a concurrent Municipal Comprehensive Review of Toronto's employment lands, referred to in the Provincial Growth Plan for the Greater Golden Horseshoe. Under the Provincial Growth Plan, it is only during such a Municipal Comprehensive Review that the City can permit the conversion of lands within employment areas to non-employment uses.

Lura Consulting and Gladki Planning Associates were retained by the City of Toronto to provide independent consultation and facilitation services for the employment lands consultations as part of the Official Plan Review. This report provides an overview of the consultation process and a summary of the feedback received.

The employment land policies consultation process utilized several communication and engagement tools including a project website, media releases, newsletters, e-updates, and social media to encourage broad participation from key stakeholder organizations and the general public.

Between January and March 2013, the consultation process sought to engage Torontonians in a discussion on proposed policies for employment lands through a variety of mechanisms. The consultation program was designed to achieve participation from a diverse set of audiences (including residents and community groups, business and industry sector associations and organizations, faith-based organizations, and labour), and to ensure that those who chose to participate are able to see their feedback accurately documented for consideration in the final recommendations of the Official Plan Review and Municipal Comprehensive Review.

Engagement mechanisms were also tailored to different audiences to further encourage participation. Planning Division staff hosted Roundtable meetings with 13 stakeholder groups and convened seven Public Open Houses across the City's four Community Council Districts. Feedback was also received through an online questionnaire and written submissions.

Feedback collected during the consultation process revealed the following thematic areas of interest and concern:

- *Need for Updated Employment Policies* – There was general appreciation for the City's efforts to review and update its employment land policies.
- *Employment Lands Designations* – There was general support for moving from a single employment area designation to multiple designations with different use permissions. There was general support for delineating and maintaining 'Core' employment areas for industrial and office uses in the geographical interior of employment areas. The delineation of specific areas where retail would be permitted with set boundaries was seen as an improvement over existing policies. There was also a questioning of whether there was sufficient difference between the use permissions in the draft 'General Employment Area' and 'Retail Employment Area' to warrant different Official Plan designations. However,

recurring feedback indicated some concerns with the proposed employment area designations and policies and included suggestions for their clarification and improvement.

- *Conversion Requests* – Many participants expressed concerns about the potential negative impact of requests to convert employment lands to non-employment uses on manufacturing and industrial jobs, and the need to maintain employment opportunities within Toronto. Representatives of Labour expressed this view in many of the Public Open Houses and in the Roundtable meeting with Toronto and York Regional Labour Council. Representatives of industry were particularly concerned that the introduction of sensitive residential uses would result in added mitigation costs, affect their ability to operate and lead to the undermining of viable employment areas. Many participants pointed to the boom in residential condo development as evidence that there was no need to convert employment lands to house Toronto's growing population. However, several development industry representatives stated that there are insufficient residential development sites to meet Provincial population targets without converting employment lands to residential uses.
- *Sensitive Uses* – In the Public Open Houses and Stakeholder Roundtables with representatives of industry, the issue of sensitive uses in employment areas was raised. The Environmental Protection Act requires the Ministry of the Environment to act on complaints of adverse effects from residents and other non-residential sensitive uses, and to ensure the source of the noise, odours, or pollutants is responsible for mitigation. Apart from the conversion requests for residential uses in existing employment areas, there was also concern that sensitive non-residential uses such as places of worship and recreational uses were proposed to be permitted in 'Retail' and 'General' employment areas. Industrial representatives were concerned with this permission as it could also lead to complaints to the MOE for noise or odours, and subsequently limit the operations of the industry or incur costly mitigation measures. All sensitive uses are taken into account when an industry is negotiating an environmental certificate for its operations. There was a sense among some industrial representatives that the Provincial guidelines and definitions of sensitive uses are not sufficiently clear.

While industry representatives were concerned with proposed permissions for new places of worship in 20 per cent of employment lands, participants from faith-based organizations were seeking modest expansions of these permissions. Church representatives were particularly concerned with the absence of a 'grandfather' clause in the draft policies that will recognize existing places of worship located in proposed 'Core' employment areas. Some church representatives proposed that new places of worship be permitted in business parks dominated by office uses now shown as 'Core Employment Areas'. Faith Group representatives also pointed out that the establishment of new places of worship was proposed to be conditional upon criteria related to parking and traffic that should be relevant to all uses that draw the general public into employment areas.

- *Net Gain of Non-Residential Floor Space in Transit-Rich Areas*
In the Public Open Houses several participants supported the draft policy to require a net gain of employment floor space as well as residential when a site with more than 100 square metres of non-residential floor space is being redeveloped for residential uses in the downtown, centres and within walking distance of a rapid transit station. They expressed the need to maintain the centres and downtown as areas of both residential and office growth. BILD strongly opposed this policy as an unnecessary regulatory incursion into a policy area that the market could resolve. Several participants stated that if the policy was meant to address the preservation of office buildings it should only apply to office buildings and that the 100 square metre threshold was too low.

Avenues Overlay – There was some divergence in feedback pertaining to the Avenues overlay proposed to be deleted from all lands with an employment area designation. Some participants were concerned that the interpretation in a previous OMB ruling for a North York case would contemplate residential development wherever there is an Avenue shown on Map 2 of the Official Plan. They therefore supported the removal of the Avenue overlay where there is an employment area designation, as businesses in the interior employment area could be harmed by the introduction of sensitive residential uses. However, on Sheppard Avenue East and Finch Avenue West where some lands are shown as 'Avenues' in the OP and where LRT lines are proposed to be constructed, there was a sense that the intensification studies accompanying the LRT development may recommend residential uses, and thought should be given to maintaining the Avenue overlay.

- *Transportation* – There was a general consensus among participants that the connection between the draft employment lands policies and the City's transportation policies should be emphasized. Feedback from industry representatives emphasized the need to make truck access and goods movement a priority.
- *Official Plan Review Process and Approvals* – A number of participants raised questions or concerns about the Official Plan Review process, the approvals process for the new employment policies and harmonization with other City processes (e.g. Zoning Bylaw). Some participants were concerned that the recommendations made by City Planning to refuse the majority of conversion requests will be appealed to the Ontario Municipal Board. Other participants expressed frustration that the OMB may overturn City Planning recommendations and Council decisions relating to employment lands. Others were critical of the unclear relationship between the Official Plan Review process and the harmonized Zoning Bylaw project.

Additional detail on the feedback under each theme area is provided in Section 3 of this report.

Section 4 of the report lists some of the proposed changes to the draft employment land policies suggested by participants during the consultation process.

Additional comments, opinions and ideas pertaining to the draft employment lands policies can be found in the report Appendices.

It should be noted that some additional feedback went directly to Planning Division staff in correspondence dealing with specific conversion request sites or letters requesting a different Employment Area designation for a particular site. Planning Division Staff have also been obtaining feedback from staff of the Ministry of Municipal Affairs and Housing and the Ministry of the Environment as well as other City of Toronto departments. All of these further comments will be considered by staff when drafting the report to Planning and Growth Management Committee on the results of the public consultation.

The feedback summarized in this report will inform City Planning staff as they consider potential changes in policy direction, and subsequently finalize the draft economic health and employment lands policies for consideration by the Planning and Growth Management Committee in the Fall of 2013.



1. Introduction

Background

The City of Toronto is in the process of conducting a Five-Year Official Plan Review. Municipalities in Ontario are required under Section 26 of the provincial Planning Act to conduct a review of their Official Plan at least every five years. In parallel with the Official Plan Review, the City is also undertaking a Municipal Comprehensive Review in accordance with the Growth Plan for the Greater Golden Horseshoe. Under the Growth Plan, a Municipal Comprehensive Review is the only time that the City can permit the conversion of lands within employment areas to non-employment uses. The City is reviewing all requests for conversions of employment lands to non-employment uses as part of this process.

Toronto's current Official Plan was adopted by Council in 2002, approved by the Minister of Municipal Affairs and Housing in 2003, and brought into force and effect by the Ontario Municipal Board in June 2006. The City began its Official Plan Review process in May 2011. The Official Plan Review is taking place in a staged manner.

The first stage of the Official Plan Review focused on information gathering:

- Public engagement during Stage 1 was conducted to collect initial observations and ideas on planning in Toronto. The consultation was conducted in the Fall of 2011 and included online consultation, stakeholder roundtable meetings and six public open houses.
- Information gathering also included research on growth trends and studies on specific topics like heritage and employment lands. For employment lands, a study – *Sustainable Competitive Advantage and Prosperity-Planning for Employment Uses in the City of Toronto* – was conducted to identify evolving land and space needs for various sectors, and how the current Official Plan addresses these needs.

After the first stage of the Official Plan Review was completed, Council divided up the review into two phases. The first phase would cover policy areas where the City is required to review the Official Plan including heritage, housing, employment lands, and transportation policies. The second phase includes policy areas which are not required by statute to be included in the review.

For each policy area draft policies were created based upon public consultation and background research. These policies were reported to Planning and Growth Management Committee, seeking approval to take the draft policies out for further public consultation. As a result of the public consultation and additional research the draft policies will be refined, made public and considered at a special statutory meeting under Section 26 of the Planning Act.

The draft policies for economic health and the employment lands were presented to the November 8, 2012 meeting of Planning and Growth Management Committee and were approved as the basis for public consultation, which took place in January, February and March 2013. The results of these consultations will be reported to the May 2013 meeting of Planning and Growth Management Committee. After reviewing the results of the

public consultations staff will prepare revised policies for economic health and the employment lands to be the subject of a statutory public meeting in the Fall of 2013.

Purpose of the Employment Lands Consultations

The purpose of this consultation was to gather comments and feedback pertaining to proposed Official Plan policy directions and changes for employment uses and designations in Toronto. The approach taken for community and stakeholder engagement was to ensure that key stakeholder groups with an interest in employment land uses and policies, as well as the general public, had an opportunity to participate in the development of Toronto's employment land policies and Municipal Comprehensive Review. The consultation approach was designed to achieve participation from a diverse set of audiences (including residents and community groups, business and industry sector associations and organizations, faith-based organizations, and labour) and to ensure that those who chose to participate are able to see their feedback accurately documented for consideration in the final recommendations of the Official Plan Review and Municipal Comprehensive Review.

The objectives of the community and stakeholder engagement process were to:

- Provide an inclusive approach and diverse engagement mechanisms – including traditional face-to-face consultation methods and social media and online tools – so that all Torontonians and key stakeholder groups have the opportunity to participate in the development and refinement of Toronto's employment uses policies;
- Present the proposed policy directions and draft policies for employment uses in easy-to-understand and accessible language to enable Torontonians to understand the proposed policy directions and changes, and provide informed feedback; and
- Document the feedback received in a manner that accurately reflects the input received during the engagement process and enables City staff and Council to make informed decisions about the employment use policies that will guide Toronto's approach to employment lands and uses in the future.

Report Contents

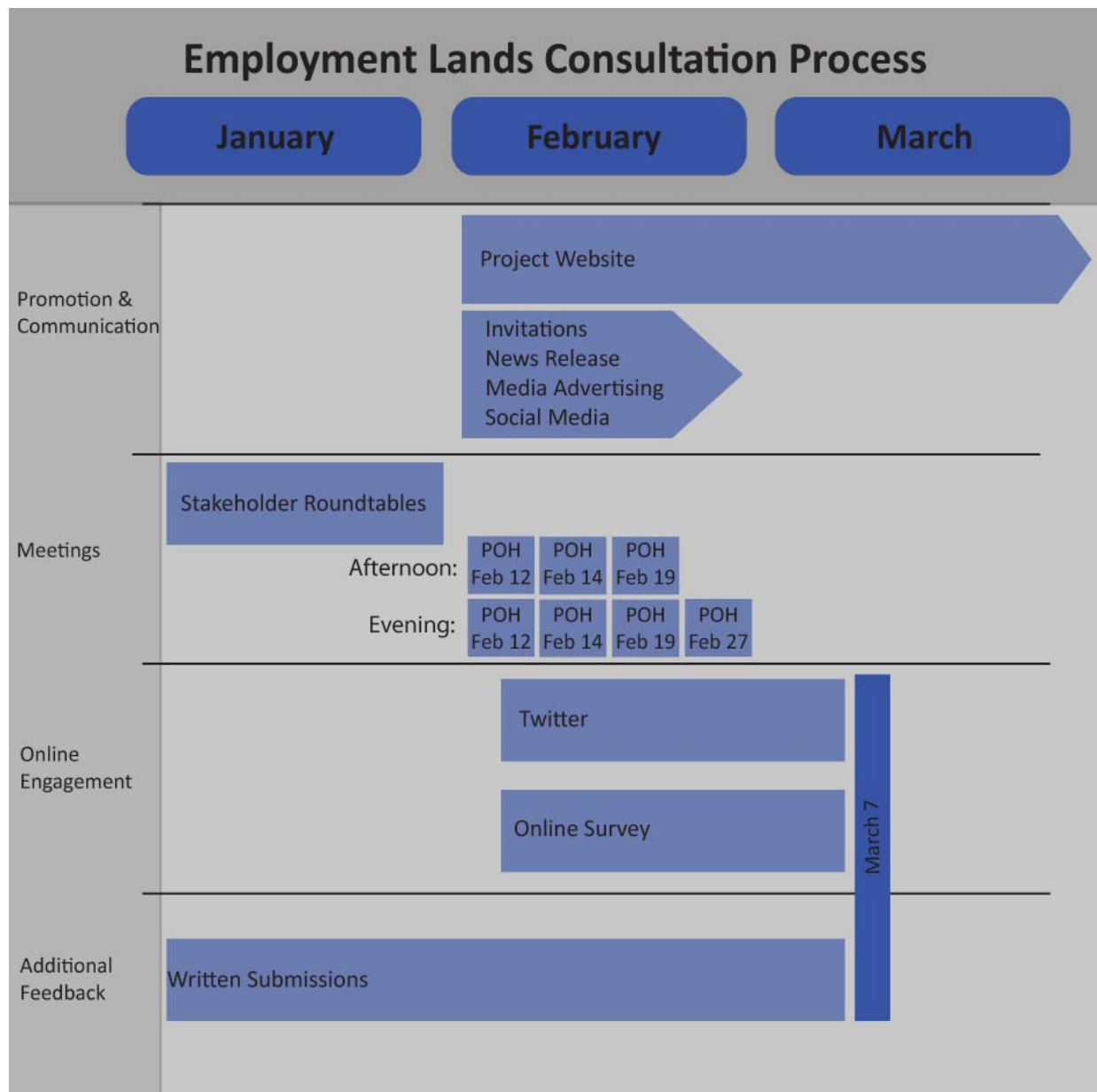
This report provides a description of the consultation activities undertaken as part of the employment lands consultations, as well as a summary of the feedback received during the consultation process. Section 2 provides an overview of the consultation process, the various consultation activities used to reach and engage different audiences, and the communication and promotional tactics used to encourage participation. An overview of the feedback received is organized into key themes in Section 3, while Section 4 provides a compilation of the suggested changes to the draft policies that emerged from the consultation process. Next steps in the Official Plan Review process are outlined in Section 5.



2. Consultation Process Overview

Consultation Process

The consultation process on the draft employment lands policies took place during January, February, and March 2013. To ensure a well-rounded, inclusive, and accessible consultation process, a multi-faceted approach was taken, targeting key stakeholders and the general public through a number of different mechanisms. The following diagram provides an overview of the consultation process and timing. Each component is described in greater detail on the next page.



Communication and Promotional Tactics

Project Website

A dedicated page (toronto.ca/opreview/employment/) on the City of Toronto's website acted as a landing spot for all information related to the employment lands draft policies and consultation process. The website included an overview of the process, all documents and resources related to the process, information about opportunities to get involved, and offered an opportunity to provide feedback directly through the site.

Social Media

Twitter was used to promote the public consultation events, as well as increase awareness and encourage participation. Tweets were posted in advance of consultation events, and during the Public Open Houses. Members of the public were encouraged to participate – via the project website or by attending a future Public Open House. The project hashtag #opreview was used on all tweets to encourage discussion.

Public Notice/Invitation

A combination of public notices, electronic newsletters, and invitations was utilized to promote public and stakeholder awareness of upcoming consultation events:

- An invitation flyer was sent to industry/employment groups, BILD, universities, Business Improvement Areas and other organizations with a request to distribute to their membership and networks;
- The invitation flyer was sent to numerous employment lands stakeholders and media outlets;
- A News Release about the consultations was issued by City of Toronto;
- A Notice was sent via E-Updates to almost 4000 subscribers for news on the Official Plan Review process;
- Bloggers with a potential interest in employment lands were provided with information about the upcoming consultations;
- A hard-copy of the notice was mailed to approximately 2000 individuals on a mailing list who wish to receive notices related to the Official Plan Review; and
- An e-mail with the notice was sent to a large e-mail list of all who had requested notices related to the Official Plan Review and had provided e-mail addresses.



HOME CONTACT US HOW DO I...? SEARCH:

LIVING IN TORONTO

DOING BUSINESS

VISITING TORONTO

ACCESSING CITY HALL

OFFICIAL PLAN REVIEW

EMPLOYMENT LANDS REVIEW

Overview

Draft Policies

Draft Mapping

Conversion Requests

Events

Reports & Documents

Your Say

Videos

Contact Us

GOOGLE TRANSLATE

in 51 languages

Employment Lands Review



Overview

At its meeting on November 27, 2012, City Council directed Planning staff to obtain feedback from Torontonians, members of the business community and other stakeholders on the draft policies, designations, and mapping for Toronto's employment lands as well as the existing requests/applications for the conversion of employment lands to non-employment uses. To learn more about Toronto's employment lands, including staff and consultant reports, please visit the documents page.

OVERVIEW

DRAFT POLICIES

DRAFT MAPPING



Employment Lands Open Houses - Draft Official Plan Policies Official Plan Review

As part of the ongoing review of the Toronto Official Plan, the City of Toronto is updating and strengthening the Official Plan policies and designations for employment lands. At its November 2012 meeting, City Council considered the proposed draft policy directions for the employment lands and preliminary assessments of the requests/applications for conversion of employment lands. The City wants your opinion on these policies and conversion requests.

Open Houses will be held on:

Tuesday, February 12, 2013, Etobicoke Civic Centre, 2 Civic Centre Crt., Council Chambers

Thursday, February 14, 2013, Scarborough Civic Centre, 150 Borough Drive

Tuesday, February 19, 2013, North York Civic Centre, Members Lounge, 5100 Yonge St.

Afternoon open house 2:00 pm to 5:30 pm, presentation and facilitated discussion at 2:30 pm

Evening open house 6:30 pm to 9:00 pm, presentation and facilitated discussion at 7:00 pm

Wednesday, February 22, 2013, City Hall, Council Chambers and Members Lounge,

100 Queen Street West.

Open house 8:30 pm to 9:00 pm, presentation and question and answer period at 7:00 pm

RogersTV.com will LIVE stream this session where you can tweet in your comments and questions.

Bookmark RogersTV webpage for this public meeting: www.rogers.com/OurCity

For more information on the employment lands review and our public consultation to date please visit: toronto.ca/opreview/employment

For further information contact:

Paul Bain

pbain@toronto.ca

Anna Czapkowski

aczajkows@toronto.ca



Information will be collected in accordance with the Municipal Freedom of Information and Protection of Privacy Act. With the exception of personal information, all comments will become part of the public record.

Employment Lands Website

Public Notice

- An advertisement for the public consultation process was placed in the Globe & Mail; and
- An advertisement for the Public Open Houses was run on the Spacing Toronto website (spacing.ca/toronto).

Other Promotional Activities

Two additional promotional strategies were employed to encourage broad participation in the consultation process:

- A number of City Councillors provided notice of the consultation process in their email newsletters; and
- Rogerstv.com promoted the live-streaming of the City Hall presentation event prior to the broadcast on February 27th.

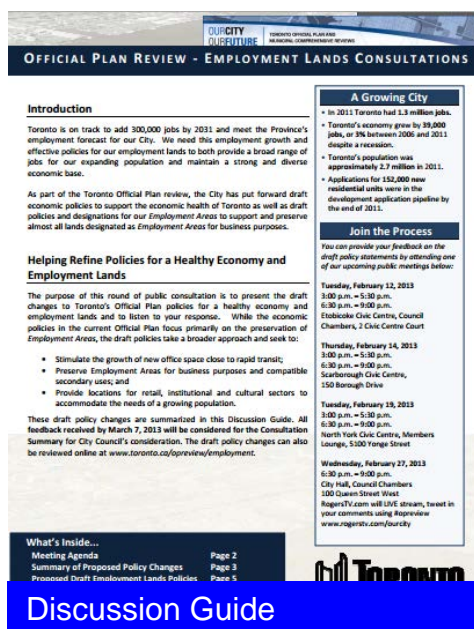
Copies of materials used to promote the consultation process can be found in Appendix A.

Consultation Resources

A number of resources were developed to facilitate participation in the consultation process. These resources were made available on the project website and at the Public Open Houses. An overview of each is provided below.

Discussion Guide

A Discussion Guide was developed to summarize all the key information regarding the draft employment lands policies in one convenient package. The Discussion Guide contained key background information, the draft policies, and focus questions. It was intended to provide consultation participants with a focused tool for learning about the proposed policies and providing feedback. The Discussion Guide was provided to participants at the Public Open Houses and available on the project website to guide online participants.



Discussion Guide



Video of Overview Presentation

Overview Presentation

A presentation was developed to provide an overview of Toronto's economic health and explain the draft policy changes. The presentation was delivered at Roundtable meetings and Public Open Houses. A PDF version of the presentation was made available on the project website.

Video

A video of the Overview Presentation with a voice-over and captioning was developed and made available on the project website. The video can be viewed on the City's YouTube channel at

http://www.youtube.com/watch?feature=player_detailpage&v=Phd_YKkxPmM

The presentation given at the Public Open House held at City Hall on March 27th was streamed live by RogersTV.com and a recording is available at

<http://www.rogerstv.com/page.aspx?lid=12&rid=16&sid=5464&ref=OurCityOurFuture>

Open House Panels

Panels were developed to provide an overview of the draft policy changes and conversion requests and provide space for participants to provide their feedback directly on the panels. These panels were on display at the Public Open Houses and were available for viewing on the project website.

Information Resources

Additional resources on the project website to inform participants included the draft Employment Policies, Draft Mapping, and a graphic of the conversion requests that are being considered as part of the Official Plan Review.

All materials developed in support of the consultation process can be found in Appendix B.

Consultation Activities

Stakeholder Roundtables

Face-to-face meetings were conducted with key employment and industry groups with an interest or knowledge of employment lands. The purpose of these meetings was to brief these stakeholders on the proposed employment lands policy directions and changes, and solicit feedback. The format of the meetings included an overview presentation, questions and answers, and open discussion about the draft policies.

Meetings were held with the following groups and organizations throughout January 2013:

- Building Industry and Land Development Association (BILD)
- Faith Groups
- Leaside Business Park Association
- National Association of Industrial Office Properties (NAIOP) and Society of Industrial Office Properties (SIOP)
- South Etobicoke Industrial Employees Association (SEIEA)
- Toronto Association of Business Improvement Areas (TABIA)
- Toronto Board of Trade
- Toronto East, West and North CAER Associations
- Toronto Industry Network (TIN)

- Toronto & York Region Labour Council (TYRLC)

Public Open Houses

Public Open Houses were hosted in each of the City's four Community Council Districts to inform participants of the proposed changes to employment lands policies and collect comments and feedback from participants. The format of the meetings was designed to encourage as much discussion as possible through a number of different methods:

- **Discussion Guide** – The Discussion Guide noted above was distributed to each participant to guide them through the Public Open House. Participants were able to provide feedback by completing a comment form in the Discussion Guide and handing it in.
- **Open House Display** – Each session included panels on display that provided an overview of the proposed employment lands policies for participants to review at their leisure. City of Toronto Planning and Economic Development staff were on hand to provide any additional information, explain the proposed policies, and listen to feedback on a one-on-one basis. Participants were also able to provide comments directly on the panels through the use of “sticky notes”.
- **Presentation** – A presentation was given by City of Toronto Planning Division staff that provided an overview of Toronto's economic health and draft employment uses policy changes.
- **Questions of Clarification** – Following the presentation participants were able to ask any further questions of clarification regarding the draft employment land policies that were not addressed in the presentation or through individual conversations during the open house component.
- **Discussion Session** – Approximately one-hour was provided for further discussion about the draft employment land policies and feedback. Discussion occurred either in small tables or as one larger group, depending on the number of participants in attendance. Discussions were focused around three general topic areas:
 - Strengths of the draft policy changes;
 - Issues or concerns with the draft policy changes; and
 - Suggestions for policy changes.

A total of seven Public Open Houses were held across the City. The meetings in Etobicoke, Scarborough and North York each featured an afternoon and evening session to maximize the opportunities for participation. The final Open House held at City Hall was streamed live by RogersTV.com. This was City Planning's first community meeting live streamed through Rogers.

Etobicoke Civic Centre 2 Civic Centre Court	Tuesday, February 12, 2013 Afternoon Open House: 3:00 pm to 5:30 pm Evening Open House: 6:30 pm to 9:00 pm
Scarborough Civic Centre 150 Borough Drive	Thursday, February 14, 2013 Afternoon Open House: 3:00 pm to 5:30 pm Evening Open House: 6:30 pm to 9:00 pm
North York Civic Centre 5100 Yonge St.	Tuesday February 19, 2013 Afternoon Open House: 3:00 pm to 5:30 pm Evening Open House: 6:30 pm to 9:00 pm
City Hall 100 Queen Street West.	Wednesday, February 27, 2013 Open House: 6:30 pm to 9:00 pm *Live streamed by RogersTV.com

Online Engagement

Parallel to the above face-to-face engagement activities, online options were also available for the public to learn about the proposed employment lands policies and provide feedback. An overview of the tools used to engage the public online in the discussions about the proposed employment lands policies is provided below.

- **Project Website “Do-It-Yourself” Consultation Process** – The project website included a *Your Say* section as a “do-it-yourself” consultation tool that provided all the information needed to inform participants, and a mechanism to provide input. The consultation resources noted above (Discussion Guide, video overview presentation, draft policies and mapping, and conversion requests) were available electronically. A survey tool also allowed people to submit their input directly through the website. The survey was structured around the same three questions that were in the Discussion Guide and allowed the public to review the information and provide feedback on their own time.
- **Twitter** – Twitter was used primarily as a mechanism to promote the Public Open Houses and the online engagement opportunities. It was also used to encourage discussion and share ideas and comments through the use of the hashtag #opreview.
- **Email** – a dedicated project email address – opreview@toronto.ca – was available for written comments to be provided directly.

Participation by the Numbers

60

The approximate number of tweets that referenced the employment lands consultations



3,333

Employment policies website views in January, February and March 2013

170

The number of participants who attended the public open houses

6

Views of the City Hall public open house on Rogers.TV



13

Stakeholder groups that Planning Division staff met with



3. Key Feedback Themes

This section presents a summary of the feedback received through all engagement mechanisms. The summary of participant feedback is organized into eight theme areas that provide a high-level synopsis of recurring comments and concerns. Detailed summaries from the Stakeholder Roundtables and Public Open Houses are available in the Appendices of this report.

Need for Updated Employment Policies

The intent of the proposed policies to retain the City's employment areas and strengthen employment land uses was positively received by the majority of participants. There was recognition that after using the existing policies and having seen them tested at the OMB and in court, that it was important to clarify with greater certainty what uses should be permitted in different parts of the City's employment lands and under what conditions. There was a fairly strong consensus that the creation of multiple employment designations was preferable to the 'one designation fits all' current employment area designation. There was also strong support for preserving the interior core employment areas in a single designation, and outlining precisely on what land uses other than manufacturing, warehousing, and office would be permitted. However, there were a number of very specific concerns raised with the draft policies that participants wished to see addressed by the City.

Employment Lands Designations and Draft Policies

- Feedback from industrialists indicated that it is not clear whether 'Core' refers to location or function. Some participants also felt that the term implies that the land in the 'General' and 'Retail' employment areas are of a lesser value, and more appropriate for conversions to other land uses or zoning amendments.
- Several industrial representatives also expressed interest in preserving 'Core' areas specifically for heavy industrial and manufacturing processes as they were concerned that office uses would outbid manufacturing uses for jobs.
- Feedback, particularly from the Stakeholder Roundtables, suggested that the differences between the proposed 'General' and 'Retail' employment areas is minimal, and that there is little value in separate designations. Participants noted that the impact of retail uses is the same whether they are in a big box form or several medium boxes, and there is no need for different designations dealing with the form of the retail. It was also noted that the current proposal does not deal equitably with firms that normally take a 'medium' scale format. Several participants noted that two designations, one for 'Core' and one to permit retail and other secondary uses would be clearer and simpler.
- Several participants, and particularly the BIA representatives, expressed concerns that the 'Retail' employment area will contribute to 'retail contagion', the proliferating development of large-scale retail establishments at the expense of small-scale and traditional 'mom and pop' retail uses.
- Several participants also took issue with the citywide application of the criterion that major retail provide structured parking and multiple storeys, noting that it is expensive and not viable or necessary throughout the City. It was particularly questioned for employment areas in the outer portions of Scarborough.
- A concern was expressed that some existing major retail complexes are within lands proposed to be designated as 'Core Employment Area' and there is no

grandfather clause to recognize them. It was suggested that Planning Division staff should check that all existing major retail complexes are included in the 'Retail' or 'General' Employment Area designations or grandfather existing major retail complexes in the 'Core' designation.

- A concern was expressed at several Public Open Houses that the policies were not clear whether automobile dealerships would be permitted in 'Core Employment Areas'.
- Several solicitors and planning consultants submitted very specific wording changes to improve the clarity of the proposed policies and their effectiveness.
- Several participants at the City Hall Public Open House were critical that there was no equity lens applied to the research or resultant policies that analyzed or differentiated impacts on employment on the basis of gender or race.
- Some participants pointed out that 'derelict' employment areas still existed and that stronger efforts needed to be made to revitalize them.

Conversion Requests

The intent to preserve an initial estimate of 98 percent of the City's employment areas for employment purposes was positively received by the majority of participants. Feedback collected throughout the consultation process revealed significant concerns about the pressure to convert employment lands for residential development. There was however some divergence in the feedback:

- Many participants were concerned about the negative impact conversion requests will incur on manufacturing and industrial jobs and maintaining a diverse economic base in Toronto.
- Other participants were concerned that the City continue to balance jobs and population so that Torontonians could work in Toronto and not commute long distances to work.
- In North York and Etobicoke some ratepayer associations were concerned with impacts, particularly traffic impacts, of conversion of employment areas near their community for high density large-scale residential redevelopment.
- A few participants stated that the policies are not clear whether a change from a 'Core' employment area to a 'General' or 'Retail' employment area would be a conversion or whether it could be dealt with by an Official Plan Amendment outside of a Municipal Comprehensive Review.
- There were concerns raised that creating a designation with retail, recreation and place of worship permissions would create a stepped process of converting lands first from primary employment to retail and non-residential sensitive uses, and then from these uses to residential uses in the future.
- A few participants and stakeholders representing the development industry and developers of seniors residences believe there are insufficient sites to build new housing to meet Provincial population forecasts without converting employment land for residential purposes.

Sensitive Uses

Manufacturing and industrial sector stakeholders were particularly concerned about the impact of residential conversions, including senior residences, and non-residential sensitive uses, such as places of worship and daycares, in employment areas.

- Stakeholders indicated that the proposed City policies are not consistent with Provincial guidelines in considering what constitutes a sensitive use. The Provincial guidelines consider places of worship and recreation uses as sensitive

uses but these uses are proposed to be permitted in 'General' and 'Retail' employment areas.

- Industrial stakeholders indicated that when a resident or worshipper or school parent complains about noise, odours, or other 'adverse impacts', the Ministry of Environment is required to respond and investigate under the Environmental Protection Act. This frequently results in orders to existing businesses in employment areas to alter their operations or install costly mitigation equipment.
- It was noted even when the Ministry of Environment does not receive complaints of adverse effects, businesses requiring environmental certificates for their operation must account for all existing sensitive uses, including non-residential uses such as places of worship, and operate on a basis that would not impact the sensitive uses.
- Meeting provincial and municipal conditions for noise was cited as the most contentious issue by several industrial stakeholders. Since noise impact is measured at the receptor rather than the source, it is one of the most common areas of complaints of adverse effect to the Province. There is a particular problem with places of worship as the City's noise by-law prohibits disturbing religious services in progress.
- Sensitive uses were noted to negatively impact manufacturing and industrial operations by altering local traffic and parking conditions which disrupt trucking routes.
- While offices are not considered to be a sensitive use, manufacturing and industrial stakeholders were also concerned about the impact of office uses on their operations including their impact upon land values and taxes.

Places of Worship

Stakeholders representing various faith groups expressed concern about the impact of the draft employment uses policies relating to places of worship and other institutional uses that are currently located in employment areas.

- Some faith groups were concerned that the draft employment lands policies do not include a 'grandfather' clause for legally established places of worship in areas proposed to be designated as 'Core Employment Areas'. The faith group stakeholders were uncomfortable with 'legal non-conforming' status as it could preclude building permits for future renovations or building expansions.
- Some faith groups felt that places of worship are unnecessarily singled out in the application of traffic and parking criteria that should apply to other secondary uses as well.
- Some faith groups indicated that places of worship should be permitted as-of-right in business parks that are primarily office-oriented.
- A few participants indicated some places of worship establish themselves in employment areas because systemic discrimination prevents them from locating in non-employment areas.
- One faith group suggested that prayer chapels should be cited as a permitted ancillary use to an employment use in Employment areas.

Net Gain of Non-Residential Floor Space in Transit-Rich Areas

There was general support during the Public Open Houses for the draft policy that dealt with a net gain in employment space as well as allowing residential in redevelopment of sites with at least 100 square metres of existing employment space in downtown, the centres and within walking distance of a rapid transit station.

- There were comments that walking distance should be clearly defined, and that the threshold of 100 square metres was too little.
- It was noted that since all of the examples dealt with the need to protect existing office buildings in the vicinity of transit, perhaps that is what the policy should restrict itself to.
- BILD's solicitor and consultant were very concerned that this policy represented an unnecessary regulation that could have inadvertent effects. BILD considered that if the market was there for office, office would be built and pointed to current office development downtown as evidence of this. BILD pointed out that there are different markets and marketing for residential and office uses, and that the City's own background reports outlined the obstacles to mixing office and residential uses in a single building. BILD suggested that there should be incentives to encourage the inclusion of office in mixed commercial residential developments rather than regulatory requirements to mandate it.

Impact of Avenues Overlay on Employment Area Designations

The proposal to delete the Avenue overlay on the Map 2 Structure Plan wherever it appears over an Employment Area designation elicited different responses.

- Some participants were concerned, because of a prior OMB hearing in North York where development lawyers argued that an Avenue overlay automatically inferred residential permissions. Due to the concern that a sensitive use such as residential on the periphery of an employment area could compromise the operations of industrial uses in the interior, the removal of the Avenue overlay was supported.
- On Avenues where an LRT is proposed and funded there was concern that the eventual intensification corridor study for the LRT route might contemplate residential uses and to remove the Avenue overlay on portions of Finch Avenue West and Sheppard Avenue East that are currently designated as employment areas may be premature. The Sheppard Avenue East BIA favoured a Mixed Use designation on portions of Sheppard Avenue East even before the LRT corridor intensification study.

Transportation

There was a general consensus among participants that the connection between the draft employment lands policies and the City's transportation policies should be more explicit.

- Some participants suggested that the draft employment uses policies do not adequately consider the traffic and parking implications of new large-scale retail uses, and places of worship and recreation uses that draw the public into employment areas.
- Inadequate road infrastructure was noted as a particular problem for manufacturing and industrial businesses that rely on the movement of goods by trucks 24 hours a day, seven days a week. The movement of goods should be a priority for roads in employment areas and sites near highway ramps.

Official Plan Review Process and Approvals

General feedback collected throughout the consultation process revealed some recurring concerns about the relationship of the Official Plan Review to other bodies or initiatives.

- Participants were concerned that once the recommendations made by City Planning to Council are approved, they will be appealed to the Ontario Municipal

Board, overriding efforts to protect employment land and existing employment uses.

- There was confusion as to the relationship between the Official Plan review and the harmonized Zoning By-law process going on concurrently. It was not clear to all that the zoning by-law process was to implement the 2002 Official Plan not the current Official Plan review or the draft employment policies being consulted on.



Participants Summary of Suggested Policy Changes

The following table summarizes some of the key commentary and changes suggested by participants to the draft policies throughout the consultation process.

Draft Employment Lands Policies
<p><i>Chapter 2 Policies – Section 2.2.4 Employment Areas:</i></p> <ul style="list-style-type: none"> • General support for retaining Employment Areas exclusively for economic activities to retain land for future employment, a stable operating environment for existing businesses, maintaining the City's tax base and maintaining jobs in Toronto near neighbourhoods that Torontonians can reach without a lengthy auto commute. • General support for intensified use of the City's geographically limited employment areas, and the adaptive reuse of properties for employment purposes. • Comments from industry that the City needs even stronger policies that put the onus of mitigation on new sensitive uses that are outside but near to employment areas. • Support from industry for policies emphasizing road priority for trucks and the movement of goods. • Support for co-ordinating employment and transportation policies and improving transit to, and pedestrian conditions within, employment areas. • Industrial representatives commented that Policy 2.2.4.1(b), which discusses preventing the incursion of sensitive uses into employment areas runs counter to the use permissions in General and Retail Area designations as they already propose non-residential sensitive uses such as places of worship and recreational uses. <p><i>Chapter 3 Policies – Section 3.5 Toronto's Economic Health:</i></p> <ul style="list-style-type: none"> • There was general support for policies 1 to 7 in Section 3.5.1 'Creating a Strong and Diverse Economy'. • Only Policy 3.5.1.8 which dealt with the replacement of non-residential employment floor space when building residential in transit-rich areas elicited significant public discussion. There was support for maintaining and stimulating office growth downtown, in the centres and within walking distance of rapid transit stations. Some participants commented that the thrust seemed to be to protect office growth and the policy should have a narrower focus on office space. Others commented that the threshold of 100 square metres was questionably low and that 'walking distance' would need to be defined to be applied consistently. BILD opposed the policy as a whole, favouring a policy that simply encouraged a net gain of employment space in redevelopment and providing incentives and tools to accomplish it, but not requiring it. <p><i>Section 3.5.3 The Future of Retailing</i></p> <p>The policies in Section 3.5.3 were generally supported by participants. There was a recognition that retail takes place in many different forms in different areas of the City and the policies need to reflect that. There were however some suggestions for improvements to the policies, including:</p> <ul style="list-style-type: none"> • Adding a reference to 'Centres' to Policy 3.5.3.2(e) encouraging connections to the PATH system. • Clarifying in draft Policy 3.5.3.6 which deals with retail on large sites, what would be considered to be a large site. If the large site is to be divided with public streets then it has to be a large enough site to warrant this. Also there was some concern that the urban

design objectives for retail on large sites may not always be suitable for portions of the outer suburbs of the City.

- Clear policies should prevent the conversion of employment areas to mixed-use – mixed-use zoning should not be allowed to convert current employment lands to residential.
- Encourage development in derelict industrial areas.
- Identify 'stressed' employment areas to allow for plans similar to Community Improvement Plans. Explore creative ways to expand the City's supply of employment land.
- Add a 'grandfather' clause for existing large-scale stand-alone retail stores and power centres to recognize established stores in the new employment area designations.

Chapter 4 Policies - 4.6 Employment Areas:

- There was consensus that it was desirable to have more than one employment area designation, including one designation to permit primary employment uses largely in the interior of employment areas, and at least one other designation nearer to the periphery of employment areas which would also permit retail uses and other recreational, entertainment uses.
- There was no consensus about permissions and restrictions around places of worship. Industry sought greater restrictions on places of worship because of their impact on existing businesses while faith groups sought expanded permissions and recognition within employment areas. There were cogent arguments put forward to merge the 'General Employment Area' and 'Retail Employment Area' designations permitting retail of all scale and forms in the consolidated designation.
- Specific comments about the policies included the following:
 - The term 'Core' employment area was not favoured by the Toronto Industrial Network as it was not clear whether it referred to function or geography.
 - There were some industrialists who favoured deleting office permissions from the 'Core' employment areas because of the impact on land values and availability of sites for manufacturing and industry. In tandem with this a designation limited to manufacturing and industry was recommended by several industrialists.
 - There were concerns that the conversion policies were not clear enough and that there was a need to rewrite them to clarify whether a redesignation from 'Core Employment Area' to 'General' and 'Retail' employment areas was considered a conversion under the Growth Plan that could only occur during a Municipal Comprehensive Review.
 - There were concerns raised by faith groups around permissions for places of worship already discussed at length in this summary.
 - There were business concerns raised about permitting non-residential sensitive uses such as places of worship within 'General' and 'Retail' employment areas given the potential for complaints to the Ministry of the Environment under the Environment Protection Act that could result in costly mitigative works and altering business operations.
 - There was a concern raised by a planning consultant that all major retail complexes in 'Core Employment Areas' should be grandfathered or that the City should ensure they are in a designation where they are permitted.
 - There were several concerns raised about Policy 4.6.8 around permissions for major retail. There were several consultants and solicitors with retail clients who believed the criteria of multi-storey buildings and structured parking should not be applied citywide and that they did not recognize the operational constraints of many major retailers. There were questions whether the impact of 'nearby' shopping districts applied to shopping districts both within and beyond the boundaries of employment areas that needed to be clarified.

- There were several solicitors who submitted small technical wording changes that were helpful to clarify the intent of the draft policies.

Other Feedback

Tax Rates:

- Revise tax rates so they are uniform in employment areas across the City and tax incentives/relief are available everywhere.
- Continue to reduce the commercial and industrial tax rates relative to residential tax rates to approach the commercial and industrial taxes levied in other 905 municipalities and attract more businesses.

Studies and Area Specific Policies:

- Add intensification timelines and require studies on the effect of sudden population increases on employment lands and employment availability.
- Increase transition zones and regeneration areas.

Regional Development and Coordination:

- Coordinate with 905 municipalities to develop regional business employment policies.
- Promote a mix of types of employment in all areas of the City to allow for greater regional development within the City and so that people don't have to travel as far to reach the types of jobs they are trained for.

Equity and Ecological Perspectives:

- Integrate ecological perspectives and green building policies in the draft employment lands policies.
- Integrate an equity perspective in planning analysis.



4. Next Steps

The feedback collected during the consultation process will be used by City Planning staff to report back to Planning and Growth Management Committee in May 2013 to outline both what we have heard in the consultations and potential changes in the directions of the draft policies that could result. The feedback will be an integral part of redrafting the policies in an Official Plan amendment to be considered at the statutory public meeting at Planning and Growth Management Committee in the fall of 2013.



APPENDIX A – Communication and Promotional Materials

February 12, 2013

Toronto seeks feedback on economic and employment lands policies

The City of Toronto is initiating public consultations to receive feedback on proposed changes to its Official Plan economic policies and the land use designations for employment lands.

As part of the Official Plan review, the City has put forward draft economic policies to support the economic health of Toronto as well as draft policies for Toronto's employment lands to support and preserve almost all lands designated as employment areas for economic purposes.

"Toronto's employment lands are an important part of the City's job creation strategy," said Mayor Rob Ford. "Employers need space to build and expand their businesses. We want to hear from residents and businesses, as we consider the best way to capitalize on our employment lands in the revision of Toronto's Official Plan policies."

The draft policies seek to stimulate the growth of new office space close to rapid transit; preserve employment areas for business purposes and compatible secondary uses; and provide locations for retail, institutional and cultural sectors to accommodate the needs of a growing population.

The consultation process offers Torontonians several ways to provide feedback on the proposed policy changes.

The first three meetings will consist of two sessions: an afternoon session (3 to 5:30 p.m.) and an evening session (6:30 to 9 p.m.); both sessions will contain the same content. The meeting format will consist of open house display boards, a powerpoint presentation and a table/group discussion/question-and-answer period.

February 12 - Etobicoke Civic Centre, 2 Civic Centre Ct. (Council Chamber)

February 14 - Scarborough Civic Centre, 150 Borough Dr. (Rotunda)

February 19 - North York Civic Centre, 5100 Yonge St. (Members Lounge)

The fourth meeting will consist of open house display boards, a powerpoint presentation and a question-and-answer period. Rogers Television will live stream this meeting. Participants can tweet their comments and questions using the hashtag #opreview. Access the live stream for this public meeting at www.rogerstv.com/OurCity.

February 27 - City Hall, 100 Queen St. W. (Council Chamber), from 6:30 to 9 p.m. with a presentation at 7 p.m.

The project website (www.toronto.ca/opreview/employment) is the primary online source of information for people to learn about the draft policies, and consultation process, and provide feedback through an online questionnaire.

Be part of the conversation. Twitter users can use the project hashtag - #opreview; email opreview@toronto.ca or sign up to receive e-updates from the City at www.toronto.ca/e-updates/index.htm (check the "Official Plan" box).

All public feedback must be received by March 7 to be considered for the consultation summary report to Council targeted for spring 2013.

Toronto is Canada's largest city and sixth largest government, and home to a diverse population of about 2.7 million people. Toronto's government is dedicated to delivering customer service excellence, creating a transparent and accountable government, reducing the size and cost of government and building a transportation city. For information on non-emergency City services and programs, Toronto residents, businesses and visitors can dial 311, 24 hours a day, 7 days a week.

- 30 -

Media contact: Bruce Hawkins, Senior Communications Coordinator, 416-392-3496, bhawkin@toronto.ca



OURCITY OURFUTURE

TORONTO OFFICIAL PLAN AND
MUNICIPAL COMPREHENSIVE REVIEWS

Employment Lands Open Houses - Draft Official Plan Policies Official Plan Review

As part of the ongoing review of the Toronto Official Plan, the City of Toronto is updating and strengthening the Official Plan policies and designations for employment lands. At its November 2012 meeting, City Council considered the proposed draft policy directions for the employment lands and preliminary assessments of the requests/applications for conversion of employment lands. The City wants your opinion on these policies and conversion requests.

Open Houses will be held on:

Tuesday, February 12, 2013, Etobicoke Civic Centre, 2 Civic Centre Crt, Council Chambers

Thursday, February 14, 2013, Scarborough Civic Centre, 150 Borough Drive

Tuesday February 19, 2013, North York Civic Centre, Members Lounge, 5100 Yonge St.

Afternoon open house 3:00 pm to 5:30 pm, presentation and facilitated discussion at 3:30 pm

Evening open house 6:30 pm to 9:00 pm, presentation and facilitated discussion at 7:00 pm

Wednesday, February 27, 2013, City Hall, Council Chambers and Members Lounge,
100 Queen Street West.

Open house 6:30 pm to 9:00 pm, presentation and question and answer period at 7:00 pm

RogersTV.com will **LIVE** stream this session where you can tweet in your comments and questions.

Bookmark RogersTV webpage for this public meeting: www.rogerstv.com/OurCity

For more information on the employment lands review and our public consultation to date please visit: toronto.ca/opreview/employment

For further information contact:

Paul Bain
pbain@toronto.ca

Anna Czajkowski
czajkows@toronto.ca



Information will be collected in accordance with the Municipal Freedom of Information and Protection of Privacy Act. With the exception of personal information, all comments will become part of the public record.



Call **3 1 1**



OURCITY
OURFUTURE

TORONTO OFFICIAL PLAN AND
MUNICIPAL COMPREHENSIVE REVIEWS

Employment Lands Open Houses Draft Official Plan Policies Official Plan Review

The City of Toronto is updating and strengthening the Official Plan economic policies and the land use designations for employment lands. Before the City finalizes the draft policy directions for economic policies and employment lands, we want to hear from you. For more information visit:

toronto.ca/opreview/employment

Open Houses will be held on:

Tuesday, February 12, 2013, Etobicoke Civic Centre,
2 Civic Centre Crt, Council Chambers

Thursday, February 14, 2013, Scarborough Civic
Centre, 150 Borough Drive

Tuesday February 19, 2013, North York Civic Centre,
Members Lounge, 5100 Yonge St.

Times for above three dates:

3 to 5:30 p.m., presentation and facilitated
discussion at 3:30 p.m., and

6:30 to 9 p.m., presentation and facilitated
discussion at 7 p.m.

Wednesday, February 27, 2013, City Hall, Council
Chambers and Members Lounge, 100 Queen St. W
6:30 to 9 p.m., presentation and question and answer
period at 7 p.m.

RogersTV.com will LIVE stream this session where you
can tweet (#opreview) in your comments and
questions. **www.rogerstv.com/OurCity**



Call **3-1-1**

Welcome



Official Plan Review – Employment Lands Consultations

Afternoon
Session

Agenda

Evening
Session

Open House

6:30 p.m.

Welcome & Introductions

7:00 p.m.

Overview Presentation

City of Toronto planning staff will provide an overview of
Toronto's economic health and draft policy changes.

7:10 p.m.

Questions of Clarification

7:30 p.m.

Discussion

The following questions will help guide the conversation:

- What are the strengths of the draft policy changes regarding
Employment Lands?
- What concerns (if any) do you have with the draft
plan?

7:45 p.m.

8:50 p.m.

APPENDIX B –
Consultation Resources



OFFICIAL PLAN REVIEW - EMPLOYMENT LANDS CONSULTATIONS

Introduction

Toronto is on track to add 300,000 jobs by 2031 and meet the Provincial Employment Forecast for our City. We need this employment growth and effective policies for our employment lands to provide a broad range of jobs for our expanding population and maintain a strong and diverse economic base.

As part of the Toronto Official Plan review, the City has put forward draft economic policies to support the economic health of Toronto as well as draft policies and designations for our Employment Areas to support and preserve almost all lands designated as Employment Areas for business purposes.

Helping Refine Policies for a Healthy Economy and Employment Lands

The purpose of this round of public consultation is to present the draft changes to Toronto's Official Plan policies for a healthy economy and employment lands and listen to your response. While the economic policies in the current Official Plan focus primarily on the preservation of employment areas, the draft policies take a broader approach and seek to:

- Stimulate the growth of new office space close to rapid transit;
- Preserve Employment Areas for business purposes and compatible secondary uses; and
- Provide locations for retail, institutional and cultural sectors to accommodate the needs of a growing population.

These draft policy changes are summarized in this Discussion Guide. All feedback must be received by March 7, 2013 to be considered for the Consultation Summary. The draft policy changes can also be reviewed online at www.toronto.ca/opreview/employment.

A Growing City

- In 2011 Toronto had **1.3 million jobs**.
- Toronto's economy grew by 39,000 jobs, or 3% per year between 2006 and 2011 despite a recession.
- Toronto's population was **approximately 2.7 million** in 2011.
- Applications for another **152,000 residential units** were in the development application pipeline by the end of 2011.

Join the Process

You can provide your feedback on the draft policy statements by attending one of our upcoming public meetings below:

Tuesday, February 12, 2013

3:00 p.m. – 5:30 p.m.

6:30 p.m. – 9:00 p.m.

Etobicoke Civic Centre, Council Chambers, 2 Civic Centre Court

Thursday, February 14, 2013

3:00 p.m. – 5:30 p.m.

6:30 p.m. – 9:00 p.m.

Scarborough Civic Centre, 150 Borough Drive

Tuesday, February 19, 2013

3:00 p.m. – 5:30 p.m.

6:30 p.m. – 9:00 p.m.

North York Civic Centre, Members Lounge, 5100 Yonge St.

Wednesday, February 27, 2013

6:30 p.m. – 9:00 p.m.

City Hall, Council Chambers

100 Queen Street West

RogersTV.com will LIVE stream, tweet in your comments using #opreview www.rogerstv.com/ourcity

What's Inside...

Meeting Agenda

Page 2

Summary of Proposed Policy Changes

Page 3

Proposed Draft Employment Lands Policies

Page 5

Discussion Questions

Page 12



Strategic Priorities for Employment Lands Policies

- Stimulate office growth close to rapid transit.
- Intensify land uses in Employment Areas.
- Preserve core areas of Employment Areas for industry, office and other primary employment uses.
- Designate areas within the periphery of Employment Areas to also provide for retail commercial uses and services
- Provide for amenities in business parks such as retail, restaurants and entertainment.
- Provide space for retail, institutional, and cultural uses to serve expanding population.

Meeting Agenda (except February 27th)

3:00 p.m. or **Open House**
6:30 p.m.

3:30 p.m. or **Welcome & Introductions**
7:00 p.m.

3:40 p.m. or **Overview Presentation**
7:10 p.m. City of Toronto planning staff will provide an overview of Toronto's economic health and draft policy changes.

4:00 p.m. or **Questions of Clarification**
7:30 p.m.

4:15 p.m. or **Discussion**
7:45 p.m. *The following discussion questions will be used to help guide the conversation:*

- *What are the strengths of the draft policy changes regarding Toronto's Employment Lands?*
- *What issues or concerns (if any) do you have with the draft policies?*
- *What policy changes would you suggest?*

Each table will be given an opportunity to report the results of their table discussion. Participants will also have a chance to respond or build on any feedback provided.

5:20 p.m. or **Wrap Up and Next Steps**
8:50 p.m. Next steps in the process and discussion of how the consultation results will be used by City staff to refine the proposed policies.

Toronto's Official Plan Review Process

Under the Planning Act a municipality must review their Official Plan at least every 5 years. Toronto's first review began in the spring of 2011. Council has divided the Official Plan Review into two Phases. The first Phase will review aspects of the Official Plan the City is required to undertake, and the second phase, to begin later in 2013 will address the policies that are not mandatory to review. The Planning Act specifically requires a review of the City's employment policies as part of the Official Plan Review, so this is part of Phase 1. Because the review work is so great a task for a City the size of Toronto, the reporting out is being done by distinct policy areas. The proposed heritage policies are already public and the draft economic policies including policies and designations for the employment lands are now being consulted on.

Both the Provincial Policy Statement and the Provincial Growth Plan for the Greater Golden Horseshoe allow conversions of employment lands to non-employment uses only during a comprehensive review of the Official Plan, such as the current review. Any requests for conversion of employment lands are being considered using the criteria set out in these Provincial documents.

Summary of Proposed Changes to Official Plan Employment Areas Policies



MAINTAINING THE HEALTH OF TORONTO'S EMPLOYMENT AREAS

Fast Facts

- Employment Areas are healthy with:
 - Over 30% of all jobs in Toronto.
 - 90% of manufacturing and warehouse jobs.
 - A building vacancy rate of 5%.
 - 31% of retail employment.
- 1,260 new firms were established in 2011.

Key Issues

- Toronto's employment areas have a building vacancy rate of only 5%, the lowest in the GTA. Land space in Employment Areas is a finite resource and Toronto may run out of land for new businesses in employment areas between 2031 and 2041.
- Retention of most employment lands is necessary to maintain a diverse economic base, broad range of job opportunities, a stable operating environment for businesses, and maintain export-oriented employment.
- Places of worship, recreation uses, restaurants and service uses are increasing in employment areas, bringing general public into heart of industrial areas.
- It is important to provide jobs throughout the City near to where people live, that can be reached by transit.

Proposed OP Changes/Additions (Sections 2.2.4; 4.6)

- Replace current single Employment Area designation with 3 designations:
 - "Core Employment Areas" (80% of land in employment areas) reserved for offices, industrial uses and services that support those businesses (80%).
 - "General Employment Areas" (8% of land in employment areas) are generally on the periphery of Employment Areas and permit all Core Employment Area uses, plus retail, places of worship, recreation and entertainment, uses, restaurants, and post-secondary colleges and universities. Large-scale stand alone retail and power centres are also permitted, outside of the Downtown and Central Waterfront.
 - "Retail Employment Area" (12% of land in employment areas) permit all forms and sizes of retail and service activities.
- More intensive use of employment lands encouraged.

GROWING THE OFFICE SECTOR

Fast Facts

- An estimated additional 20.5 million sq. ft. of office space is needed to meet demand in Toronto by 2031 and up to 31 million sq. ft. by 2041.
- Office employment has doubled in the last 30 years but construction of new offices lags behind the 905.
- 12 mill. sq. ft. former industrial building space has been converted to offices in King-Spadina and King-Parliament

Key Issues

- Majority of future jobs in Toronto will be office jobs and need to be located near rapid transit to reduce commute times and road congestion.
- Need to ensure that office areas are not lost through ongoing residential intensification so Torontonians can live and work in the City.
- Few new office buildings in Don Valley Business Parks, which need more amenities for office workers to make them more attractive for office developers.

Proposed OP Changes/Additions (Section 3.5.1)

- Current Official Plan Economic Policies do not address office growth.
- Draft policies promote new office development in Downtown, the four Centres, and within walking distance of rapid transit stations.
- Improved fiscal incentives and priority processing of applications for new office buildings (and industries).
- Require increased non-residential floor space in residential developments on sites with employment uses in Downtown, the Centres and within walking distance of rapid transit stations.
- Provide for retail, restaurants, entertainment in Don Valley Business Parks for office workers.

SUPPORTING GROWTH IN RETAIL, INSTITUTIONAL, AND CULTURAL SECTORS

Fast Facts

- **Retail:** 25% of jobs in Toronto are in retail and service sector. 31% of retail jobs are in Employment Areas.
- **Institutional:** 43,000 new institutional jobs were added between 2001 and 2011.
- **Cultural:** There are 83,000 workers in Toronto's Cultural Sector. The sector generates \$9 billion of Toronto's GDP.

Key Issues

- New retail space needs could range from 11 million to 23 million square feet in next 20 years.
- There will be increased demand for universities, colleges, and hospitals to serve a growing and aging population.
- There is increasing pressure from residential intensification in key areas where cultural industries cluster.

Proposed Policy Changes/Additions (Sections 3.5.1, 3.5.3, 4.6)

- New draft Official Plan Employment Area designations specify exactly where different forms of retail are provided for.
- New draft criteria for retail on large sites to promote street related retail, promote pedestrian and transit use and limit traffic impacts on existing neighbourhoods.
- New draft criteria for large stand-alone retail stores and power centres in employment areas require multiple storeys and underground or structured parking to take up less Land.
- New draft policy to maintain and expand non-residential floor space in the 'Kings' and Liberty Village to encourage continued growth of cultural enterprises.

CONVERTING EMPLOYMENT LANDS TO NON-EMPLOYMENT USES

Fast Facts

- There are over 110 requests and applications to convert employment lands, almost all to residential uses as of mid-January 2013. Teams from Planning and Economic Development Divisions are assessing applications according to Provincial criteria.

Key Issues

- Most residential conversion requests are in healthy employment areas. Viability of employment areas may be undermined by the introduction of sensitive residential uses, particularly for impactful industries.
- Employment areas provide jobs for nearby residential neighbourhoods. Loss of Employment areas potentially affects balance of population and jobs in the City.
- Is there a need to convert employment lands for residential purposes given current development approvals and the opportunities for new residential units in areas where residential growth is permitted and encouraged?

Proposed Policy Changes/Additions

- As of November 8th report, over 98 per cent of employment lands were proposed to be retained as employment areas, including preliminary assessment of first 65 conversion requests and housekeeping to show changes prior to OP Review.
- Considering redesignation to regeneration areas in a few isolated small employment areas with rapid transit, vacant lands, low employment and prior residential approvals. Area studies to provide development framework and ensure growth of employment space accompanies residential development.

Draft Official Plan Employment Lands Policies¹

Table of Contents

CHAPTER 2 POLICIES	Page 6
'2.2.4 Employment Areas: Supporting Business and Employment Growth	Page 6
CHAPTER 3 POLICIES	Page 7
'SECTION 3.5 TORONTO'S ECONOMIC HEALTH	Page 7
3.5.1 CREATING A STRONG AND DIVERSE ECONOMY	Page 8
3.5.3 THE FUTURE OF RETAILING	Page 9
CHAPTER 4 POLICIES	Page 10
4.6 EMPLOYMENT AREAS	Page 10
Core Employment Areas	Page 10
General Employment Areas	Page 10
Retail Employment Areas	Page 10
Large-Scale Stand-Alone Retail Stores, Power Centres and Employment Areas	Page 11
Policies for All Employment Areas	Page 11

CHAPTER 2 POLICIES

Delete Section 2.2.4 and replace it with the following:

'2.2.4 Employment Areas: Supporting Business and Employment Growth

1. Employment Areas, shown on Maps 2, and 13 to 23 inclusive, will be used exclusively for economic activities in order to:
 - a) Retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing, warehousing, utilities and transportation;
 - b) Provide a stable and productive operating environment for existing and new businesses by preventing the incursion of sensitive land uses into Employment Areas that could impact the operations of businesses;
 - c) Maintain and grow the City's tax base;
 - d) Offer prominent, accessible and, where possible, visible locations and a wide choice of appropriate sites for potential new businesses;
 - e) Continue to contribute to Toronto's diverse economic base and maintain the base of export-oriented wealth creating employment;
 - f) Contribute to a balance between jobs and housing to reduce the need for long-distance commuting and encourage travel by transit, walking and cycling;
 - g) Reinforce the live-work relationship between Employment Areas and nearby residential neighbourhoods; and
 - h) Contribute to a broad range of stable full-time employment opportunities.
2. A more intensive use of lands in Employment Areas will be encouraged to make better use of a bounded and limited supply of lands available for businesses that are only permitted in Employment Areas. The interior of Employment Areas will be reserved for Core Employment Area uses such as offices, manufacturing, the warehousing and distribution of goods, and utilities. Non-ancillary retail commercial

¹ Please note, the draft Official Plan policies for employment lands have been provided on pages 5-11 for reference purposes only as part of the consultation process. The draft policies and language referenced in this document should not be considered final or approved.

uses and other service functions compatible with the function of Employment Areas will be directed to lands along the boundaries of Employment Areas.

3. Employment Areas will be enhanced to ensure they are attractive and function well, through actions such as:
 - a) Permitting a broad array of economic activity that encourages existing businesses to branch out into new areas of activity and facilitates firms with functional linkages to locate in close proximity to one another;
 - b) Investing in key infrastructure, or facilitating investment through special tools, incentives, and other programs or partnerships, in order to:
 - a. Promote the distinctive character or specialized function of an area to attract businesses within a particular targeted cluster of economic activity;
 - b. Facilitate the development of vacant lands and the adaptive reuse of vacant buildings for employment purposes; and
 - c. Address the absence of key physical infrastructure, poor environmental conditions or poor accessibility.
 - c) Encouraging and supporting business associations that promote and provide a voice for businesses within Employment Areas;
 - d) Establishing a connected network of public streets for use by trucks, automobiles, transit and pedestrians; and
 - e) Promoting a high quality public realm by the creation of comfortable streets, sidewalks, parks and open spaces for workers with landscaped streetscapes to promote pedestrian/ transit use and attract new business ventures.
4. New residential and other sensitive land uses where permitted adjacent or near Employment Areas will be appropriately designed, buffered and/or separated from industries as necessary to prevent or mitigate adverse effects from noise, vibration, traffic, odour and other contaminants upon the occupants of the new development, and lessen complaints and their potential costs to businesses.
5. Measures will be introduced and standards applied on roads within Employment Areas that give priority to the movement of trucks and transit vehicles.
6. Transit use will be encouraged in Employment Areas by:
 - a) Investing in improved levels of service to Employment Areas, particularly from nearby residential areas and Mixed Area Uses.
 - b) Encouraging new employment development to take place in a form and density that supports transit;
 - c) Creating safe and comfortable pedestrian conditions between places of work and transit stops; and
 - d) Encouraging travel demand management measures.'

CHAPTER 3 POLICIES

A. *Delete Section 3.5.1 and replace with the following:*

'SECTION 3.5 TORONTO'S ECONOMIC HEALTH

3.5.1 CREATING A STRONG AND DIVERSE ECONOMY

1. Toronto's economy will be nurtured and expanded to provide for the future employment needs of Torontonians and the fiscal health of the City by:
 - a) Maintaining a strong and diverse economic base;
 - b) Contributing to a broad range of stable full-time employment opportunities for all Torontonians;



- c) Maintaining a healthy tax base for the City;
 - d) Promoting export-oriented employment;
 - e) Attracting new and expanding employment clusters that are important to Toronto's competitive advantage;
 - f) Offering globally competitive locations for national and international business, through the provision of a wide choice of sites for new businesses;
 - g) Aggressively promoting investment in Toronto in International markets; and
 - h) Providing incubation space for new start-up firms to establish themselves and grow.
2. A multi-faceted approach to economic development in Toronto will be pursued that:
- a) Stimulates transit-oriented office growth in the Downtown and the Central Waterfront, the Centres and within walking distance of existing and approved and funded subway, light rapid transit and GO stations in other Mixed Use Areas, Regeneration Areas and Employment Areas;
 - b) Protects Employment Areas as stable places of business;
 - c) Provides opportunities and appropriate locations for new retail and service establishments;
 - d) Encourages the expansion of health and educational institutions, and improving transit access to them; and
 - e) Promotes the Cultural Sector as an important element of our economy.
3. A balanced growth of jobs and housing will be pursued to:
- a) Maintain a complete community;
 - b) Reduce the need for long distance commuting and lessen regional road congestion; and
 - c) Increase the proportion of travel by transit, walking and cycling.
4. Programs and incentives will be established to grow employment and investment consistent with the policies of this Official Plan, particularly targeting key economic clusters and the development of office buildings. These programs will include both fiscal incentives and the priority processing of development applications for new office buildings and industries.
5. Investment on the part of public agencies or through partnership agreements will ensure that infrastructure will be maintained, improved and extended in the following areas:
- a) Streets and public transit;
 - b) Water and sewer lines;
 - c) Reliable supply of energy sources including electricity, natural gas, district energy centres and cooling systems;
 - d) Telecommunications networks; and
 - e) Access to Pearson International and Billy Bishop Airports.
6. New office development will be actively promoted in Mixed Use Areas and Regeneration Areas in the Downtown and Central Waterfront and Centres, and all other Mixed Use Areas, Regeneration Areas and Employment Areas within walking distance of an existing or approved and funded subway, light rapid transit or GO station. Within these areas, Secondary Plans and Site and Area Specific Policies will establish policies providing for minimum standards for commercial development within walking distance of existing and/or approved and funded subways, light rapid transit and GO stations.
7. In planning for new subways, light rapid transit and GO routes, the location of established and potential new office concentrations will be considered.
8. In Mixed Use Areas and Regeneration Areas in the Downtown and Central Waterfront and the Centres, and all lands designated Mixed Use Areas and Regeneration Areas within walking distance of existing and/or approved and funded subway, light rapid transit or GO stations, new development that includes residential units on a property is required to increase the non-residential gross floor area on the site, except where less

than 100 square metres of gross floor area exists on the site. Where site conditions and context do not permit an increase in non-residential gross floor area on the same site, the required replacement and increase of non-residential floor space may be built on another property within the same geographic Downtown or Centre or within walking distance of the same existing or approved and funded subway, light rapid transit or GO station in other Mixed Use Areas or Regeneration Areas.

9. Universities, colleges and hospitals will be supported in their efforts to better serve residents and businesses throughout the region by:
 - a) Creating and advancing research and development alliances;
 - b) Creating new enterprises in partnership with the business community on campuses;
 - c) Linking to the growth of biomedical and biotechnology enterprises;
 - d) Developing the skills of Toronto's labour force as organizational and technological innovations shape economic prospects;
 - e) Retaining current institutional lands for future expansion to serve a growing and ageing population within the Greater Toronto Area; and
 - f) Promoting the design of campuses with a high quality public realm organized to promote visual and physical links with adjacent areas of the City.'

B. *Add a new policy 6 to Section 3.5.2 as follows:*

- '6. Cultural enterprises and employment are clustered within the King Spadina Secondary Plan area, the King Parliament Secondary Plan area and the Liberty Village Area of the Garrison Common North Secondary Plan. The availability of non-residential floor space in these areas will be maintained and expanded to encourage the continued growth of cultural enterprises.'

C. *Delete Section 3.5.3 and replace with the following:*

3.5.3 THE FUTURE OF RETAILING

1. A strong and diverse retail sector will be promoted by:
 - a) Permitting a broad range of shopping opportunities for local residents and employees in a variety of settings;
 - b) Supporting specialty retailing opportunities that attract tourists and residents of the broader urban region;
 - c) Encouraging and supporting effective business associations in retailing areas;
 - d) Supporting retail opportunities in a form that promotes pedestrian and transit use; and
 - e) Encouraging stores selling fresh food in areas currently lacking pedestrian access to fresh food.
2. Retailing areas will be improved by:
 - a) Providing a high quality public realm which promotes local identity and is understandable, usable, comfortable and connected including a connected network of public streets serving pedestrians, transit, trucks and vehicles;
 - b) Encouraging high quality retail development of a type, density and form that is integrated with the existing and planned context of the area and the surrounding uses;
 - c) Improving public amenities such as transit and parking facilities, street furniture and landscaping; and
 - d) Encouraging retailing in more intensive formats; and
 - e) Encouraging connections to the PATH system in the Downtown and other grade separated public walkways associated with subways which complement and extend the system of public streets.
3. Street related retail at the base of larger development with a fine grain of entrances should be provided in Centres, on streets adjacent to higher order transit, on Avenues, and transit priority streets to promote pedestrian use. Where retail buildings have been set back with parking between the street and the

sidewalk, new infill street-related retail development is encouraged to be constructed adjacent to the public sidewalk to promote pedestrian and transit use.

4. Retail on large sites should be designed to promote street related retail, promote pedestrian and transit use and limit traffic impacts on existing neighbourhoods and employment uses by:
 - a) Dividing a large site with public streets, and shared driveways designed to meet the roles of City streets, to divide the site into appropriately scaled development blocks;
 - b) Providing safe and comfortable pedestrian connections between the retail stores, the parking areas, and the public sidewalks at the edge of the site.
 - c) Providing safe and comfortable pedestrian connections between retail development on adjacent sites;
 - d) Phasing development to define and support public streets first; and
 - e) Organizing servicing uses away from pedestrian areas and adjacent sensitive land uses.'

CHAPTER 4 POLICIES

A. *Delete Section 4.6 policies and replace with the following:*

'4.6 EMPLOYMENT AREAS

Core Employment Areas

1. Core Employment Areas are places for business and economic activities. Employment uses permitted in Core Employment Areas are offices, research and development facilities, manufacturing, warehousing, distribution of goods, utilities, post-secondary business and trade training facilities, arts training facilities and studios, media facilities, and vertical agriculture.
2. Secondary uses, which support the primary employment uses set out in Policy 1, that are permitted in Core Employment Areas include: hotels, parks, as well as small-scale restaurants and catering facilities of a maximum size set out in the applicable Zoning By-law(s), ancillary workplace daycare, and small-scale service uses that directly serve business needs such as courier services, banks and copy shops of a maximum size as set out in the Zoning By-law(s). Small scale retail outlets that are ancillary and on the same lot may be permitted up to a maximum size set out in the applicable Zoning By-law(s).
3. Lands in Core Employment Areas may only be converted from Employment Areas to non-employment uses including, but not limited to residential and institutional residential uses, and/or a large- scale stand-alone retail store or a power centre as defined in policy 14 of this section, through a Municipal Comprehensive Review where it has been demonstrated that the conversion criteria set out in all applicable Provincial Plans and Policies have been met.

General Employment Areas

4. General Employment Areas are places for business and economic activities generally located on the boundaries of Employment Areas where a variety of secondary uses may be established without disturbing the planned and existing function of the Core Employment Areas. In addition to the uses permitted in Core Employment Areas, the following activities are also permitted in General Employment Areas: recreation and entertainment uses, restaurants, and post-secondary colleges and universities. Places of Worship are also permitted in General Employment Areas provided:
 - a) Full-time elementary and/or secondary schools, are not established as an ancillary use to the place of worship;
 - b) Vehicle parking is provided that is adequate to serve the congregation; and
 - c) Vehicle traffic is not directed to the interior of a Core Employment Area.

5. Lands in General Employment Areas may only be converted from Employment Areas to non-employment uses including, but not limited to residential or institutional residential uses through a Municipal Comprehensive Review where it has been demonstrated that the conversion criteria set out in all applicable Provincial Plans and policies have been met.

Retail Employment Areas

6. Retail Employment Areas are areas where the full spectrum of retail and service activities may be established subject to the criteria of this Plan without adversely impacting the functioning of the Core Employment Areas. In addition to all uses permitted in Core Employment Areas and General Employment Areas, the full range and scale of retail and service uses are permitted in Retail Employment Areas.
7. Lands in Retail Employment Areas may only be converted from Employment Areas to non-employment uses including, but not limited to residential or institutional residential uses through a Municipal Comprehensive Review where it has been demonstrated that the conversion criteria set out in all applicable Provincial Plans and the policies have been met.

Large-Scale Stand-Alone Retail Stores, Power Centres and Employment Areas

8. Large-Scale Stand Alone Retail Stores and Power Centres are not permitted in Core Employment Areas. These uses may be considered in General Employment Areas and Retail Employment Areas outside of the Downtown and Central Waterfront, through the enactment of a zoning by-law where the following matters are addressed to the City's satisfaction:
 - a) The transportation demands and impacts generated by the development are reviewed and necessary improvements and mitigation measures are identified;
 - b) It is demonstrated that the existing and planned function of the economic activities within any nearby Employment Area is not adversely affected;
 - c) It is demonstrated that the economic health of nearby shopping districts is not adversely affected;
 - d) New public streets and/or driveways designed to City Standards for new streets as appropriate are provided, adding to the area street network and providing improved pedestrian access and amenity;
 - e) Retail buildings are located with street frontage and direct entrances from the sidewalks of the public streets or private driveways designed to City standards for new streets;
 - f) Parking located between the retail uses and the public sidewalk is minimized, and parking is located at the flank or rear of the building;
 - g) Buildings with a minimum height of two storeys are provided; and
 - h) The majority of vehicle parking is located below grade and/or in a parking structure with limited visibility from the street.

Policies for All Employment Areas

9. Development will contribute to the creation of competitive, attractive, highly functional Employment Areas by:
 - a) Supporting the existing and planned economic function of the Employment Areas;
 - 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 system 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 Employment Areas 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 and open space to create an attractive streetscape, and screening parking, loading and service areas;
 - k) Treating the boundary between Employment Areas and residential lands with landscaping, fencing, or other measures to minimize nuisance impacts; and
 - l) Ensuring that outside storage and outside processing is:
 - 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 detrimental to neighbouring land uses in terms of dust, noise and odours.
10. Implementing Zoning By-law(s) will create a gradation of zones that distinguish between employment uses on the basis of their potential operations and impacts to ensure a compatibility of uses within Employment Areas.
11. Where the Zoning By-law permits outside storage or outside processing of goods and materials as the primary use on a property in Employment Areas, the outside storage or processing will:
- a) Be well-screened by fencing and landscaping where viewed from adjacent streets, highways, parks and neighbouring land uses; and
 - b) Not be detrimental to neighbouring land uses in terms of dust, noise and odours.

12. Definitions

Employment Areas are all lands designated on Maps 13 to 23 as Core Employment Areas, General Employment Areas, and Retail Employment Areas.

Within Employment Areas a Large-Scale Stand-Alone Retail Store is a single retail unit that has a gross floor area of at least 6,000 square metres and is the only retail unit on the lot.

Within Employment Areas a Power Centre is a single lot with more than one retail unit at least one of which has a gross floor area of 6,000 square metres or greater.

Within Employment Areas, Large-Scale Stand-Alone Retail Stores and Power Centres are considered to be major retail uses.

The term Municipal Comprehensive Review has the same meaning as the definition in the Growth Plan for the Greater Golden Horseshoe, 2006.'

Join the Discussion

What are the strengths of the draft policy changes regarding Toronto's Employment Lands?

How Will My Feedback Be Used?

Feedback received during the consultation process will be used to help refine the proposed policies for employment lands. All feedback received by March 7, 2013 will be included in the Consultation Summary Report for the project which will be publicly available on the project website once complete.



www.toronto.ca/opreview

What issues or concerns (if any) do you have with the draft policies?

What policy changes would you suggest?

Once completed, please tear off this sheet and submit it to the project team at the end of the meeting.





APPENDIX C – Stakeholder Meeting Summaries

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Toronto York Region Labour Council

Date: January 9, 2013

Time: 9:30 a.m. – 11:30 a.m.

Note Taker: Lily D'Souza, Lura Consulting

Location: TYRLC, 15 Gervais Drive

Individuals / Organizations in Attendance

- Toronto York Region Labour Council (Labour Education Center, Canadian Auto Workers Local 112, Workers United, CEP, CHW, Community Benefits Project, Toronto Area Council of United Steel Workers);
- Toronto City Planning, and;
- Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- Protecting existing employment uses / maintaining jobs
- Applications / requests to convert employment lands and the implications for unions and jobs
- Questions about the process to appeal decisions for applications to convert employment lands
- General questions about terminology, land use policies and proposed employment lands policies

Questions + Comments

1. Protecting existing employment areas / job protection

A comment was made noting that in cases where residents express concerns over neighbouring employment activities, the employment areas often pre-date the adjacent residential areas.

- These comments are in line with the draft policies' objective to protect existing employment uses from conversion to avoid conflicts and maintain employment.

2. Applications / requests to convert land

Questions requesting clarification about the proposed General Employment Areas policy in relation to applications to convert employment lands were posed: As per the map (depicting conversion applications), the majority of conversion requests are on the periphery of the employment areas, right? Does the General Employment Area designation apply to the periphery of the employment area? Will re-zoning for general areas be easier than the other employment areas?

- City staff responded that many of the conversion requests are on the periphery, whereas others are in the core, so not all are located in the periphery.
- City staff also noted that the zoning bylaw will have to conform to the new Official Plan policies after they are approved.
- Appears to be a need to distinguish between geography and function in terms of

proposed employment areas (three shades of purple).

3. Process and procedures to appeal decisions regarding requests to convert land

There were several questions and comments regarding the procedures to request / apply to convert employment lands, and the subsequent process to appeal decisions.

- The assumption is that some members of the development industry will appeal the City's decision to refuse their conversion requests to the OMB.
- City staff briefly explained the appeal process, noting that the first phase of any OMB hearing will likely be to determine if converting designated land uses is in fact necessary.
- TYRLC generally support the policies being proposed to protect employment lands and want to know what opportunities they have for intervention if appeals are made to the OMB (e.g. party status / participant status, how to appeal an OMB decision, etc.).

TYRLC also expressed concern that appeals made to the OMB regarding conversion requests will delay the approval of the Official Plan.

- City staff addressed these concerns by explaining that the Official Plan can be brought into effect except for a specific list of appeals / sites which would be resolved on a case by case basis.
- They also noted that the next municipal comprehensive review and OP review will take place within 5 years after the updated OP comes into effect.

4. Identifying properties that are the subject of a conversion application that employ union members represented by the TYRLC

Questions were posed about applications, or the status of applications, to convert specific properties where union members represented by the TYRLC are employed. TYRLC council members also wanted to know what information was needed to find out if a conversion request is pending on one of the properties/employers they represent.

- City staff responded that all they need is an address, and staff can provide them with the information.

5. General questions about terminology and land-use policies

Questions clarifying the difference between employment areas, and mixed-uses areas were brought up when one member asked if there was a conversion request near the Toronto Star building.

- City staff noted that it is not an employment area, and is not subject to a conversion request.
- City staff also informed the TYRLC that they are proposing policies that will require residential condo developments to also increase net office space if they are non-residential uses to begin with.

A question was posed asking whether a landowner has the right to convert / develop residential uses in an employment area if the Avenues designation overlaps the employment area designation.

- City staff cited an OMB decision on Sheppard East that inferred the Avenue overlay in

the Official Plan permits residential in employment areas, but made it clear that that was not the intention of the policy.

- To avoid the same argument being made in the future, City Planning is lifting the Avenues overlay from all of the employment areas; but this will not be in effect until City Council approves the Official Plan policies, likely by end of 2013.

Question whether traffic issues caused by presence of large-scale retail in employment areas are factored into decision-making when approving applications? This is a concern for their employers.

- City staff noted that stand-alone large-scale retail stores and power centres should be permitted in both the general and the retail employment areas, but would be subject to a zoning by-law amendment and be considered on the basis of criteria outlined in the Official Plan.

A comment was made that the difference between Policies 6 and 7, under *Retail Employment Areas*, and Policy 8, *Large-Scale Stand-Alone Retail Stores, Power Centres and Employment Areas* is not clear. A question was asked about the relationship between the two sections.

- City staff noted that Stand-Alone Retail, Stand-Alone Big Box and Power Centres would be permitted in both the general and the retail employment areas, but would be subject to a zoning by-law amendment, based on the criteria outlined in Policy 8.
- The difference is that there is greater scrutiny for large-scale retail than smaller retail because of the impact.

Feedback on Draft Policies

In general, TYRLC indicated support for policies that protect jobs and avoid loss of employment lands. TYRLC is hosting an internal meeting on January 19th to begin developing comments to as part of the review / consultation process.

Action Items	Responsible	Deadline
City staff to send map (proposed designations, three shades of purple, organized by district) to TYRLC chair and post them on website as they are updated	City	ASAP
E-mail OMB decision (company located beside National Rubber and Canada Bread) to TYRLC Chair	City	ASAP
City Staff to e-mail contact information for district staff to TYRLC Chair	City	ASAP

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Toronto Industry Network

Date: January 10, 2013	Time: 2:00 p.m. – 3:50 p.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: Metro Hall, 55 John St., Room 313A

Individuals / Organizations in Attendance	<ul style="list-style-type: none"> ▪ Toronto Industry Network ▪ City Planning ▪ Economic Development ▪ Lura Consulting
--	--

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- Sensitive Uses
 - Places of worship and daycares
- Requests / applications for conversions
- Terminology and proposed changes in draft policies

Questions and Comments

There was some discussion regarding the repatriation of manufacturing from overseas, and the need to maintain employment areas to accommodate their return. These comments are in line with the draft policies' objective to retain employment lands despite short-term market fluctuations.

1. Sensitive Uses

TIN members had several questions and concerns about sensitive uses located in employment areas, particularly places of worship and daycares.

Have you had discussions with Ministry of the Environment (MOE)? Is a hotel still a sensitive use?

- City has met with the province, but only with the Ministry of Municipal Affairs and Housing (MMAH). Inquired about MOE guidelines for sensitive uses, but no changes are forthcoming in the immediate future.
- There is no comprehensive list of sensitive uses, although MOE guidelines include a list of sensitive uses.

a. Places of Worship

TIN members noted that places of worship and their ancillary uses create problems for existing manufacturing / industrial activities when they locate in employment areas, particularly if a business wants to expand its operations.

They also expressed specific concerns about places of worship complaining to the MOE about neighbouring manufacturing / industrial activities. They also noted issues of parking and traffic which are not necessarily limited to one day of

the week, and could in fact be several depending on the particular place of worship / congregation. The following questions were asked in relation to places of worship:

What will happen to the existing places of worship that are located in employment areas?

- They become legal non-conforming land uses; City Planning is not proposing to grandfather them at this point.

The General Employment Areas permit places of worship, are they subject to re-zoning? This question was followed by a comment suggesting that places of worship have not been planned for in the City's OP policies.

- City staff responded that will be subject to re-zoning in Core Areas. The zoning by-law does not permit them to locate just anywhere.
- The problem is the zoning bylaw was harmonized before the Official Plan review; it will have to be updated again to conform to the new Official Plan policies when they are approved by Council, and come into force.
- Places of worship have been accounted for; exceptions to their development are noted in the Official Plan policies.

b. Daycares

A comment was made that daycares as ancillary uses to places of worship should be restricted; in some cases, these begin as daycares and evolve into elementary, then secondary schools.

- City staff responded saying that this is a tricky issue, with two policy considerations. There is a real need for workplace and daycare, and policies to enable them.
- City staff do not want to implement a policy that would restrict daycare further.
- City staff also observed that daycares are not identified as a permitted use in General Employment Areas, and therefore are not allowed. Daycares would only be permitted in an employment area as an ancillary use to either a workplace or a place of worship.
- City staff noted that the new policies prohibit full-time elementary and secondary schools in Employment Areas.

2. Conversion Requests

There were some questions about requests / applications for conversions that have been appealed to the OMB:

Will the OMB hearings be consolidated or individual?

- Likely consolidated – OMB traditionally deals with the general policies then individual site appeals.

When will the hearings take place / happen?

- After the Official Plan policies are approved by Council, and the Minister.

3. Changes in Draft Policies

Terminology of new policies includes – core, general and retail. TIN feels that City Planning should move away from using the term 'core' as it implies that the surrounding areas are of a lesser value. The proposed terminology also implies

that 'core' areas refer to the geographic centre of an employment area. TIN suggests that changing the terminology would make it easier for City staff in the long run. In place of 'core' TIN suggested using 'employment' or 'industrial'; the term 'employment' on its own however, is open to interpretation and may lead to questions about what is considered employment. These comments were made in reference to Section 2.2.4, Policy 2.

- City staff clarified that the term 'core' is refers to function, not geography.
- City staff also explained that the problem with replacing 'core' with 'industrial' is that the largest single use in employment areas are offices.
- City staff also debated the terminology and found a problem with every alternative to 'core'.
- May need to clarify in non-statutory text that 'core' is functional, but most often in interior.

The following questions and comments relating to the draft policies were brought up:

Employment Areas not in Employment Districts, what is going to happen to them (e.g. Sterling Road, Tecumseh...)?

- The new proposed policies remove the distinction between Employment Districts and Areas. The new policies will treat them the same way.

Why is there no designation for office uses? Why are they not being re-designated in the proposed policies?

- City staff explained that manufacturing activities are mixed in with offices uses in the city's employment areas.
- Instead, site-specific policies for the Don Valley and Consumers Road employment areas will be created, to permit additional retail, restaurants, and entertainment uses for workers.

One TIN member pointed out a 'loophole' between Policy 6, *Retail Employment Areas* and Policy 8, *Large-Scale Stand-Alone Retail Stores, Power Centres and Employment Areas*. It was noted that policies around large-scale stand-alone retail stores in Policy 8 don't need to pertain to Retail Employment Areas because they are permitted in these areas anyway as outlined in Policy 6.

- City staff agreed and noted that Policy 6 should be updated to include something to the effect of "subject to conditions for large-scale stand-alone retail formats."

Feedback on Draft Policies

In addition to the above comments, TIN will submit written comments at a later date.

Action Items	Responsible	Deadline
TIN to provide written comments on draft policies	TIN	March 7



City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Faith Groups

Date: January 18, 2013	Time: 2:00 p.m. – 3:30 p.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: Metro Hall, 55 John St., 22 nd Floor Main Boardroom
Individuals / Organizations in Attendance	<ul style="list-style-type: none"> Faith Groups - Toronto Faith Coalition; United Church South West Presbytery; Salvation Army; Catholic Archdiocese; Ontario Conference of Seventh Day Adventists; UJA Federation; United Church of Canada City of Toronto - City Planning; Economic Development; Zoning Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion session focused on:

- Clarifying how the draft policies will affect existing Places of Worship and institutional uses situated in employment areas;
- Understanding the relationship between the draft employment uses policies and the City's zoning bylaws;
- Suggesting changes to clarify terms and intended outcomes of the draft employment uses policies.

Questions and Comments

1. Effect of draft policies on Places of Worship

Do the draft employment uses policies change the way Places of Worship are addressed in employment areas compared to the existing policies? What is the nature of the change?

- City planning staff responded that there has been a change; the current policies permit Places of Worship on arterial roads in the heart of employment areas, i.e. major roads throughout Employment Areas.
- The draft policies propose to no longer permit Places of Worship in 'Core' employment areas. Places of Worship will however be permitted in designated 'General' and 'Retail' areas at the periphery of the core areas. This is to lessen the need for the general public to enter into the heart of an employment area and having to negotiate truck traffic and other employment related functions.

This brought up concerns pertaining to existing Places of Worship: Would the existing Places of Worship be able to stay? What would happen to them?

- City Planning noted that it depends if they were legally established; if they were legally established, then they would be permitted to stay.

Are you carrying forward the permission for existing Places of Worship?

- City Planning advised that there is currently no grandfather clause in the policies pertaining to existing Places of Worship.

In response to this, representatives from the Ontario Conference of Seven Day Adventists explained that it has been through the lengthy zoning amendment process on at least one occasion, and feels that the draft Official Plan policies

should include a grandfathering clause. The Conference representative explained that it has seven Places of Worship located in core employment areas that are categorized as legal-non-conforming uses. The Conference feels that the term 'legal-non-conforming' implies that they don't belong there, and should re-locate. The Conference also expressed that many Places of Worship, not only their properties, will renovate or expand at some point in their life-time, requiring a minor variance from the zoning Bylaw. Acquiring a minor variance will be difficult if there is no grandfather clause in the draft policy.

- City staff responded that they are familiar with the comments and concerns presented by the Conference because they had the same conversation internally, and suggested outlining these comments and concerns in writing as part of the consultation process.

A comment was made that employment areas presently contain a myriad of other uses that are not employment activities such as Bingo Halls, and that the draft employment uses policies seem to be silent about these other uses.

- City staff responded that Bingo Halls are considered to be recreational or entertainment uses, permitted in 'general' or 'retail' Employment Areas.
- City staff also explained that the draft policies use the same principles and approach when dealing with recreational or entertainment uses as they do with Places of Worship – the intent is to keep the general public on the periphery and out of core employment areas.

2. Institutional Uses

How are institutional uses impacted by the draft employment uses policies?

Where do they fit?

- City Planning staff explained that institutional uses in the draft policies have not been substantively affected. Most large institutions are designated 'institutional'.
- The draft policies do not permit the development of large institutional campuses (e.g. college or university campuses and hospitals) in employment areas, and encourage institutional landowners to buy and sell from one another.

Where do retirement homes fit in?

- City Planning responded that retirement homes are not permitted in employment areas.
- The reason for this is that retirement homes are a form of residential development, and therefore considered to be a sensitive use by the MOE. The intent is to avoid potential complaints to the MOE and land use conflicts that often occur when residential developments are located near impactful industries.
- City Planning also noted that 1) seniors are particularly sensitive to noise vibrations and odours, and 2) they also benefit from being near a mixture of amenities such as parks, retail and transit.

How do religious schools fit into the plan?

- In response, City Planning staff directed attention to Policy 4.6, General Employment Areas, section 4 which states "*General Employment Areas* arePlaces of Worship are also permitted in General Employment Areas provided:
 - a) full-time elementary and/or secondary schools, are not established as an ancillary use to the place of worship."
- As an example, a Synagogue, cannot open a full-time school, but can offer ancillary educational uses such as an after-school program or Sunday school.

There appears to be an inconsistency between the treatment of art studios /

clubs/ recreational uses and Places of Worship. The land use characteristics of these uses are similar, although the art studios / clubs/ recreational uses are not being very clearly excluded from employment areas.

- City Planning provided background to the policies pertaining to arts training facilities. The rationale is that if trade schools are allowed, then arts and cultural training facilities should also be allowed.
- In terms of entertainment and recreation uses, they are being treated the same way as Places of Worship in employment areas with the intent to keep the general public out of core employment areas.

3. Zoning

Major retail is permitted in employment areas in the draft policies by zoning amendment, will Places of Worship be an as of right use or will they require a zoning amendment?

- City Planning staff responded that Places of Worship will need to meet conditions for zoning.
- The current zoning bylaw will have to be updated to reflect changes to the Official Plan (OP) made during the OP review process, when they come into effect.
- The current zoning exercise is to implement the 2006 Official Plan.

What is the relationship between the OP and the harmonized Zoning Bylaw? The concern expressed by the Toronto Faith Coalition is that it is assumed that Places of Worship are permitted in all other areas / designations, in terms of the OP. The problem is when it comes down to getting permits for new Places of Worship, the current harmonized zoning bylaw would not permit them in any of the residential zones / employment zones. There seems to be a significant disconnect between the OP and the Zoning Bylaw. Places of Worship should be recognized as a legitimate use.

- City Planning staff explained that when the OP was first drafted, planning staff agreed that Places of Worship are part of the fabric of a neighbourhood.
- It was also agreed that an OP amendment should not be needed to develop a place of worship in a neighbourhood, although they would need to meet zoning standards.
- The OP has always limited Places of Worship in employment areas, the draft policies are not changing that. The change in the draft policies is that Places of Worship will only be permitted outside core employment areas.

Feedback on Draft Policies

The following comment was noted as the priority issue that the Toronto Faith Coalition would like to see Places of Worship permitted in the business parks (four Employment Areas along the Don Valley Corridor).

A few comments were subsequently made noting that there are some great examples of synergies between Places of Worship and nearby businesses such as reciprocal parking agreements. There are lots of examples of Places of Worship in business parks, where they are not necessarily impactful uses.

Specific changes were suggested for the following sections of the draft policies:



Policy 2.2.4.2 – Specifically ‘non-ancillary uses’ in the last sentence. The Toronto Faith Coalition suggested that it would be helpful if either the type of place of worship or a catch-all term for other uses / activities was inserted into that sentence to make them more explicit.

- City Planning staff noted there isn't a catch-all phrase that can be inserted, as there are uses that they want to keep out of employment areas. Places of Worship are really the exception, as institutional uses are not generally permitted in employment areas.

Policy 4.6.2. The addition of ‘ancillary place of worship’ to the list of permitted secondary uses would make the intent of the policy more explicit. There are examples of employers that do have ancillary Places of Worship in their facilities. The United Church Observer, Air Varsity Christian Fellowship and the Salvation Army were cited as examples of employers that might have ancillary chapels, or designated prayer spaces for their employees, i.e. workplace chapels.

Policy 4.6.4. The last sentence “Places of Worship are also permitted in *General Employment Areas* provided:” addresses Places of Worship separately and apart from the other permitted uses. With respect to this policy, the Toronto Faith Coalition is content with the first condition, a), but feels that conditions b) vehicle parking and c) vehicle traffic should be true of all the permitted uses. Places of Worship shouldn't be singled out as these requirements should apply to all the permitted uses equally.

- City Planning staff agreed with the points made in the suggestion / comment.

Several faith groups stated that their organizations would submit formal comments / letters regarding the draft policies as part of the consultation process at a later date.

Action Items	Responsible	Deadline
City Planning to provide Toronto Faith Coalition with data pertaining to the total area of business parks.	City	ASAP
Faith Groups to submit individual comments / letters	Faith Groups	March 7

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Board of Trade

Date: January 21, 2013

Time: 2:00 p.m. – 3:00 p.m.

Note Taker: Lily D'Souza, Lura Consulting

Location: Metro Hall, 55 John St., 22nd Floor Main Board Room

Individuals / Organizations in Attendance

- Board of Trade (BOT)
- City of Toronto: City Planning; Economic Development
- Lura Consulting

Key Items Raised

The Board of Trade expressed that it is generally supportive of the draft employment uses policies, and did not identify any issues or concerns during the meeting. A number of questions were asked to clarify the regulatory processes that govern land-use decision-making and the intent of the stakeholder consultations.

Questions and Comments

The BOT representative commented that the ratio of business taxes to residential taxes, and requests / applications to convert employment lands are both of significant interest to the BOT. The BOT is particularly concerned about the tax burden on businesses, and is pleased that the City has been taking steps to address the imbalance.

The BOT representative commented that the Board is also actively working in two other policy areas that rely / are related to the preservation of employment lands in Toronto: public transit funding and cluster development in the food and beverage and life sciences sectors. The BOT representative emphasized that there is a real need to protect Toronto's employment lands to prevent businesses from relocating outside the City or the GTA, and to attract future economic development.

There were several questions during the meeting about the regulatory framework and procedures that govern land use planning:

Has the Official Plan been successful in terms of intensification along the corridors around the City? There seem to be a large number of conversion applications. Is the message that the OP is generally a good one?

- City Planning staff responded that the Official Plan has been very effective at directing residential growth to the Centres, Avenues and Downtown.
- City Planning staff also explained that the Official Plan Review / Municipal Comprehensive Review is the only window when developers can apply for a conversion request, under new rules introduced under the Planning Act in 2007.

What is the process to request / convert employment land? Who specifically does the review of those applications? Is it handled by your department?

- City Planning staff responded that each conversion request / application is reviewed by a team of City Planning and Economic Development staff.
- City Planning staff also explained that the conversions are not always applications, some are simply letters requesting a change in land use designation. In fact the planning legislation does not require an application and only states that this is the window of opportunity to request or apply for a conversion in land use. City Planning did not announce that it would be reviewing conversion requests or applications, they just starting coming in to the department following the start of the Official Plan Review in May 2011. Prior to this, developers who expressed an interest in building condos on employment lands were often refused by Council or told to resubmit their request / application during the Official Plan Review period. The developers could not appeal the refusal per rules in the 2007 Planning Act. The Official Plan Review / Municipal Comprehensive Review is therefore the window of opportunity to submit a conversion request or application, and includes the right to appeal a decision to the OMB.
- City Planning staff also noted that during the Official Plan Review / Municipal Comprehensive Review period only the conversion request portion of an application is being considered.
- Once City Planning and Economic Development staff complete their due diligence for each conversion request / application, their recommendations are reported to City Council.

Are there weaknesses in the system (regulatory planning framework)? What is the intent of the consultation process?

- City Planning staff responded that the Planning Act treats all municipalities the same way. Toronto however is unique – it is bounded, finite, and built out which impacts land values, causing greater pressure for conversions. Markham for example only has three conversion requests.
- It is important for the City to hear from a diversity of stakeholders during the consultation process, particularly those that recognize the importance of economic diversity and preserving employment lands.

Feedback on Draft Policies

The BOT is generally supportive of the draft policies as they are in line with economic development goals that the BOT is actively working on. The BOT will submit formal comments and a letter of support at a later date.

Action Items	Responsible	Deadline
BOT to provide written comments on draft policies	BOT	March 7

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: West, East and North Toronto Community Awareness and Emergency Response (CAER) Associations

Date: January 22, 2013	Time: 10:00 p.m. – 12:00 p.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: Metro Hall, 22 nd Floor Main Boardroom
Individuals / Organizations in Attendance	<ul style="list-style-type: none"> ▪ Toronto West, Toronto East, and Toronto North CAER Committees ▪ City of Toronto – City Planning; Economic Development ▪ Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- Conversion requests / applications;
- Sensitive uses;
- Clarifying terminology and wording in the draft policies.

Questions and Comments

1. Conversion requests / applications

The Toronto-York Spadina Subway Extension will pass through employment areas in the north end of the City. Has there been pressure to convert employment lands near the planned subway stations for residential development?

- City Planning staff responded there have not been a lot of conversion requests / applications near the planned subway extension stations. This is depicted in the "Requests/Applications to Convert Employment Lands" [map](#). It is expected that employment lands adjacent to the planned subway stations will be retained for employment uses.
- City Planning staff suspect that Bombardier flight paths restrict the possibility of developing high-rise condos in that area of the City.
- City Planning and Economic Development staff agree that there may be more pressure to convert employment lands near the new subway stations during the next Municipal Comprehensive Review.

Referencing the map of conversion requests, a committee member asked the following question: If a company wants to relocate to a central location downtown Toronto, how does it know that the zoning Bylaw isn't going to change, particularly if the company is interested in investing for longer than five years?

- City Planning staff explained that the zoning bylaws have not changed significantly over the past decades. The new harmonized zoning by-law will replace the existing 41 zoning by-laws. The large number of conversion requests the City is receiving is in part due to new land use conversion rules introduced by the Province in 2007 through changes to the Planning Act and the earlier Provincial Growth Plan. The Growth Plan limits the conversion of employment lands to a comprehensive municipal review of the Official Plan. The Planning Act requires this review at least five years since the OP came into force. This sets up the OP review as the only window to convert employment lands to

non-employment uses. Land in Toronto is finite and built out. City Planning staff also noted that the intent of the draft policies is to retain the City's employment areas, and to prevent sensitive uses from locating within the core employment areas.

The CAER committee members explained that even if the land use designations don't change in the zoning bylaw, their concern is with the policies that regulate what kind of employment activities are permitted in employment areas, as these activities can change over time. They expressed the need for clearer definitions of what employment uses are allowed and which ones aren't.

- City Planning staff explained that the OP policies are intended to be general. The draft policies refer to gradations of employment uses which are specified in different zone categories within the zoning bylaw.

CAER committee members were interested to know whether the City's EMS department is also involved in the consultation process as increasing density throughout the City will have an impact on emergency response times.

Increasing residential density near active chemical manufacturers is a particular concern in terms of safety. CAER member industries must prepare, and include EMS in their worst case scenario plans and training exercises. From their experience, CAER members explained that Torontonians who live in apartment buildings or condominiums don't participate in drills, or attend public open houses.

- Planning staff explained that the consultation process includes a meeting with other City departments, which EMS has been invited.

2. Sensitive Uses and Certificates of Approval

The following question was posed following a brief overview of Policy 2.2.4.4: How do the draft policies address uses that are not permitted, but are present in employment areas such as places of worship or schools?

- City Planning staff explained that the draft employment uses policies do not permit schools in employment areas. Places of worship are permitted, but only in the General and Retail areas.
- City Planning staff noted that a similar question was asked during the stakeholder meetings with the Toronto Industry Network (TIN). TIN feels that there is an issue with places of worship as worshippers may call the Ministry of the Environment (MOE) to complain about noise and odour pollution. Places of worship are considered a sensitive use by the Province.

The response from City Planning staff prompted the following comments: The industry is concerned about sensitive uses. It doesn't matter what the City thinks about sensitive uses, it's what the MOE considers sensitive uses as businesses apply to the MOE for Certificates of Approval. Before the MOE issues a Certificate of Approval, a business needs to mitigate its noise and air emissions based on the location of the nearest sensitive use, among other things. The presence of a place of worship near an impactful industry is an issue in and of itself, regardless whether the place of worship complains to the MOE or not. There needs to be more consistency between the Province and the City with regard to what is considered a sensitive use. The MOE and the Ministry of Municipal Affairs and Housing (MMAH) do not explicitly state what a sensitive

use is. There are MOE guidelines and examples of sensitive uses, but not a comprehensive list of them.

Members of the CAER committees also explained that their factories operate 24 hours a day, seven days a week. Institutions such as places of worship choose to locate in employment areas generally because the land is cheaper. Parking and traffic are the most common issues with places of worship located in employment areas. The most contentious issue however is noise. For example, there are rules against disturbing a religious ceremony in progress. Another problem is that places of worship do not understand the full-scale of operations of some industries and complain to the MOE even when the industries are within their Certificate of Approval limits.

A CAER committee member commented that complaints are also frequently made by residents living in new condominium developments, not residents who have been residing in the neighbourhood for years.

The CAER committee members emphasized the need for a defined list of sensitive uses in the Official Plan several times during the meeting.

- City Planning staff stated that they will ask the MMAH and MOE for clarification regarding sensitive uses.

Feedback on Draft Policies

3. Comments and Questions about the Draft Policies

The Toronto North CAER committee member noted that he is generally supportive of the draft employment uses policies. However there is an issue of not being able to get in and out of core employment areas. The draft policies should protect transportation routes to mitigate issues pertaining to noise, and safety and to facilitate access to and from employment areas.

- City Planning staff responded that there are policies for trucking.
- City Planning staff noted that they understand that residential uses along highway access points would displace businesses that benefit from highway visibility and the proximity of highway on / off ramps. The intent of the draft policies is to retain the employment areas near the 400 series highways for these reasons.

Are all types of industries captured in the draft policies? What about companies that recycle, clean up spills, or process hazardous waste?

- City Planning staff explained that these companies / activities would generally be designated as 'core employment areas'.

How are institutional uses like places of worship, day cares or homeless shelters being addressed in the draft employment uses policies?

- City Planning staff explained that places of worship are not permitted in the core employment areas. Day cares are permitted only if they are ancillary workplace daycare. Residential uses including homeless shelters, nursing homes, and university residences are simply not permitted in employment areas.

The following comments, suggestions and questions were offered by the North Toronto CAER committee member:

Policy 2.2.4(b) – The intent of the policy (to prevent the incursion of sensitive uses) is important, but perhaps it should be moved to the section about “core” areas as sensitive uses are permitted in the “general” and “retail” areas.

Policy 2.2.4(g) – The committee member suggested using a different term to denote “live-work” which already has a certain meaning. “Work place-home” was offered as an alternative.

Policy 3.5.3.2(e) – The committee member suggested adding “Centres” to the sentence.

- City Planning staff explained that the intent of this policy is to promote retail complexes / options on the subway lines.

Policy 4.6 – The committee member suggested that it may not be appropriate for all office uses and all secondary uses to be permitted in core employment areas, as some of them may be considered sensitive uses by the province (e.g. arts and training facilities, hotels, animal care facilities, and parks). He emphasized the need for clarification with regard to sensitive uses, as there are few people within the industry who really understand what they are. The committee member also explained that the City isn’t necessarily aware of noise and odour complaints, as they are made to the province.

- City Planning staff noted that if hotels are considered sensitive uses then it’s a problem, as there are many hotels near impactful industry in the City’s employment areas.
- City Planning staff also noted that several good points were made that they have not previously heard through the consultation process.

A CAER North representative pointed out that there are examples of labour-intensive industries (e.g. industrial launderers) that employ people who rely on public transit. If the draft policies are promoting retail development on main streets, the concern is that industries that need to locate near public transit routes will have to compete with retail establishments for main street frontage.

How is small-scale retail being defined?

- City Planning staff explained that it will be defined in the zoning bylaw.

Is retail permitted in core employment areas?

- City Planning staff responded that retail is not permitted in core employment areas, with few exceptions such as coffee shops or restaurants to serve employees.

Are malls allowed in retail employment areas?

- City Planning Staff responded that malls are permitted in retail employment areas, although developers generally don’t build malls anymore.

Where are existing stand-alone retail stores located in employment areas? Are they in core employment areas?

- City Planning staff responded that most of them are in general and retail areas.

Policy 4.6.8(b) – Remove the word ‘nearby’ as the policy is referring to uses within the employment area.

Policy 4.6.9(j) – What is a flanking yard? Does landscaping matter if it is adjacent to a street?

- City Planning staff responded that a flanking yard is a side yard, and landscaping does matter if the flanking yard is on a side street.

Policy 4.6.9(l) – Is it really an issue if outside storage is screened, and hidden from view?

- City Planning staff responded that the policy refers to stored material that is being / will be processed. Screening material stored outside adds value to the property.

Are there policies in the residential section of the OP to mitigate land uses conflict with employment areas / activities? If these policies exist in the employment section, shouldn't there be corresponding policies in the residential section?

- City Planning responded that they are currently reviewing the non-statutory sections of the OP. City Planning staff also explained that a statement that applies to all the land use designations, like the one being referred to by the stakeholder, exists in the environmental section of the OP.

Do the draft policies call for buffer zones between employment areas and the surrounding land uses?

City Planning staff explained that buffer zones will be implemented through the employment designations (core, general and retail), with retail acting as a buffer on the periphery of the employment area.

Action Items	Responsible	Deadline
Provide overlay map of locations / list of chemical industries in Toronto	CAER Committees	ASAP

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: National Association of Industrial Office Properties & Society of Industrial Office Properties

Date: January 23, 2013	Time: 1:30 p.m. – 3:00 p.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: Metro Hall, 55 John St., 22 nd Floor Main Boardroom
Individuals / Organizations in Attendance	<ul style="list-style-type: none"> ▪ National Association of Industrial Office Properties (NAIOP) ▪ Society of Industrial Office Properties (SOIP) ▪ City of Toronto: City Planning and Economic Development ▪ Lura Consulting

Key Items Raised

Both the NAIOP and SIOP representatives expressed their general support for the draft employment uses policies. Questions were asked by both representatives to clarify the:

- conversion of manufacturing land uses to office land uses;
- regulatory framework that governs requests / applications for land use conversions; and
- intent of the stakeholder consultations.

Questions and Comments

1. Conversion of manufacturing land uses to office land uses

Do you regard an office job to be as important as an industrial job? If someone wants to replace a dilapidated, rundown manufacturing facility with a new office building, is that keeping in line with Official Plan (OP) policies?

- City Planning staff responded yes to both questions.

It is unclear whether conversions from manufacturing uses to office uses are acceptable in the existing OP policies.

- City Planning staff explained that office jobs contribute significantly to employment opportunities in the city, and will eventually constitute the majority of employment opportunities in Toronto. City Planning does not foresee any challenges associated with office development in the City's manufacturing areas, although the zoning bylaw may restrict or limit these types of developments in heavy industrial zones, for example.

Isn't the tax rate for industrial properties higher than the tax rate for office properties? Traditionally the industrial tax rate has been higher than the warehousing tax rate. There have been complaints from manufacturers within Toronto and outside the City about the difference in taxes.

- City Planning staff responded that the City has been reviewing the ratio of taxes between residential and non-residential properties. Commercial taxes rates are being adjusted on an annual basis in an effort to balance them with residential tax rates.
- City Planning staff also explained that the fiscal health of the City depends on the retention of a healthy base of employment lands.

A comment was made noting that leveling the tax ratio to close the gap between 416 and 905 areas is a smart policy. It will attract investment in the City and promote economic development. The City should do whatever it can to encourage industrial redevelopment.

The SIOP representative commented that the term 'employment' is used by Toronto City Councillors to refer to industrial areas outside the downtown core, although there are employment areas that consist primarily of office buildings. He also noted employment areas near the Don Valley Parkway that are transitioning from manufacturing to office uses. Lever Brothers was cited as an interim industrial use with the potential for complementary office and future residential development.

- City Planning staff agreed that the Lever Brothers site is suitable for office development and some retail uses, but not residential development as there are impactful industries in the area, some of which are expanding to serve a growing city (e.g. City works yards).

The SIOP representative also noted that investments in public transit infrastructure are having an impact on office development in 905 areas. He offered the example of a site formerly occupied by a GE factory that is being redeveloped as an office building with PWC as the anchor tenant next to a GO station in Oakville's Urban Growth Centre. The GO station provides reliable transportation to Toronto's downtown core, and direct access to a labour pool, particularly the younger demographic, who do not want to work in the 905 areas unless there is public transit.

- City Planning staff noted that there has been a rise in office development in Toronto. According to a TD report by Francis Fong, office development in Toronto is outperforming office development in the 905 region in terms of raw GFA, as employers are following the labour force.

When asked by City Planning staff whether the pace of office development in the City is sustainable, the NAIOP representative commented that it is. He noted that even if an office building has been approved for development, it does not mean that it will actually get built. There is more flexibility in the development industry for office construction than there is for condominium construction and he cited rules for financing condominium development. There isn't as much of a concern about an oversupply of offices as there is of condominiums as office developers do not build on speculation the way condominium developers do.

The NAIOP representative responded that there is a strong brick and beam culture, and demand for the office amenities offered in the King-Spadina area when asked by City Planning staff about the City's effort to protect brick and beam buildings. He did state that one issue when the buildings are being re-developed is that there is a tendency for only the facade to be maintained.

2. Conversion Requests / Applications

Is there a cut off for requests / applications to convert employment lands?

- It was explained by City Planning staff that there is no deadline during the Municipal Comprehensive Review / Official Plan Review period to submit a conversion request or

application. According to the rules in the Planning Act, this is the only window of opportunity for proponents to request or apply for a land use conversion. City Planning anticipates that the Municipal Comprehensive and Official Plan Reviews will be approved by City Council by the end of the year. The cut off for application is the statutory public meeting in the fall.

How is City Planning reviewing and dealing with the volume of conversion requests / applications?

- City Planning staff explained that the conversion requests / applications are being reviewed by teams of Economic Development and City Planning staff. Due diligence for each request is completed using criteria set out in the Provincial Growth Plan.

Feedback on Draft Policies

The NAIOP representative commented that while the draft employment uses policies are more specific than the policies that are currently in force, he anticipates that there will be push back from within the industry for more definitions and to express the intent of the policies more explicitly. He added that he appreciated the presentation and the background information pertaining to the policies, particularly the long-term objectives of the policies and how they relate to the City's economic development.

Action Items	Responsible	Deadline
NAIOP and SIOP to provide written comments on draft policies	NAIOP / SIOP	March 7

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Building Industry and Land Development Association

Date: January 24, 2013	Time: 4:00 p.m. – 6:00 p.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: BILD, 20 Upjohn Road, Boardroom
Individuals / Organizations in Attendance	<ul style="list-style-type: none"> ▪ BILD ▪ City of Toronto: City Planning, Economic Development ▪ Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- General questions and comments about the material presented by City Planning staff; and
- Mandating the replacement of existing office uses for new residential developments near rapid transit (Policy 3.5.1.8).

Questions and Comments

1. General questions and comments

When will the next report regarding conversion requests be submitted by City Planning to City Council?

- City Planning staff responded that the next report to Planning and Growth Management Committee with additional preliminary assessments of conversion requests will be in the Spring 2013, most likely in May.

It was mentioned during the presentation that the City is on track to meet the population growth targets set by the Province. Is this the basis for the position against converting significant amounts of employment lands for residential development?

- City Planning staff responded that conversion requests are reviewed using criteria outlined in the Provincial Growth Plan. Determining whether there is a need to convert land is only one of several criteria that must be addressed. The criterion 'Is there a need for the conversion' is not solely being related to meeting the Provincial Population Forecast. For example, the staff teams are also reviewing whether there is a need for the conversion to mitigate existing or potential land use conflicts.

A BILD member/consultant commented that while it was presented by City Planning staff that there are sufficient applications in the residential development pipeline to meet Provincial population growth forecasts, in reality the geographic distribution of the proposed developments is skewed. Scarborough, for example, needs new investment. There are several opportunities in Scarborough for development on the periphery of employment areas.

- Staff acknowledged that the current development pipeline was quite concentrated in downtown sites and other areas where developers could command their necessary price per square foot. There has been less interest by developers in Scarborough, although

there are many sites in Mixed Use Area and Apartment Neighbourhood designations for new residential development.

The BILD member stated that we have experienced a tremendous development boom in the past decade and yet the City is not that much ahead of the Provincial population forecast at this point. Is it reasonable to expect the same rate of development in the coming decades? The City should not necessarily be comfortable that the Provincial population targets will be met without conversion of employment lands for residential purposes.

- City Planning staff reiterated that there is no need to convert employment areas for residential development in order to meet the Province's population forecast given the considerable development pipeline and additional opportunities for new residential development outside of employment areas.

The MGP report recommended a greater range of uses on the periphery of business parks, including residential development. Why is the staff report less permissive of those uses on the periphery of business parks?

- City Planning staff responded that the MGP report only recommended residential uses be considered on the periphery of business parks in the vicinity of rapid transit stations. City staff considered the recommendations and as a result proposed to permit retail, restaurants and services in business parks to amenitize them and proposed implementing four regeneration areas near rapid transit.

Generally speaking there appears to be new office construction and a supply of office space across the City. Why does the City feel the need to regulate replacement of office space? Is the concern that there won't be enough office space if the land base is not protected?

- City Planning staff responded that there is a need to balance residential intensification with non-residential employment uses. For example, the office space downtown attracts residential development and the downtown residential intensification attracts new offices wishing to take advantage of a local skilled and educated labour force.

City Planning staff are interested in feedback specific to the 'retail' and 'general' employment area categories, and asked BILD members for their input.

- One BILD member noted that he was commenting on his own behalf, and stated that it is strange to include retail of all sizes in the Retail employment area designation and large scale (major) retail in the General Employment Areas, but not deal specifically with medium-scale retail in either of the categories. The proposed employment area categories (Core, General and Retail) are a huge improvement over the existing single employment area designation, but it makes sense to combine the 'retail' and 'general' categories.

2. Policy 3.5.1.8

Counsel for BILD commented that the association is concerned about the policy mandating the replacement of existing non-residential uses in new residential developments (Policy 3.5.1.8). While mixed-use developments are desirable, current market conditions do not always support what the policy mandates. The MGP report appendix outlines some of the difficulties in building residential and office uses in the same building. It is unclear why City Planning is mandating the replacement of existing office space, and why it assumes the market will not

respond to a demand for office space without policy intervention.

Counsel for BILD added that there appears to be a disconnect between the intent of the draft employment uses policies and the Policy 3.5.1.8. The broader policy intent is to create export-oriented jobs, however Policy 3.5.1.8 will lead to the development of mixed-use buildings and offices that current market conditions would not support. The offices will most likely be leased at a discount rate to tenants, and may not attract the desired export-oriented jobs. The policy is counter-productive to the overall policy intent.

Counsel for BILD also added that while the rationale to promote office development near rapid transit is implicit, the link between the draft employment uses policies and the provision of infrastructure is not clear.

Counsel for BILD explained that Policy 3.5.1.8 does not appear to be substantiated by a market analysis. Developing retail in the first few stories of a high-rise building does not make economic sense, as the balance of the building's units will in reality subsidize the retail development. The Loblaws and Winners on Queen Street West at Portland Street are examples of this. The quality of the tenancies and empty spaces are other concerns.

BILD acknowledges that mixed-used development makes sense in many circumstances, but not on every site. The members requested further clarification of the conditions and intent of the Policy 3.5.1.8.

- City Planning staff responded that the policy targets the replacement of existing non-residential uses in new residential developments in transit rich locations such as the Downtown Core, the Centres and within walking distance of rapid transit stations. It does not apply to all sites. The rationale is to promote and maintain transit supported office development. The policy is flexible and provides off-site replacement options.
- City Planning staff pointed out that there is not one undifferentiated office market in the City. We are currently seeing new Class A office buildings constructed downtown while at the same time important brick and beam Class B office buildings are being demolished to make way for residential condominiums. We need both in Toronto. City Planning staff added that office growth has been higher in Toronto than in the 905 municipalities for the past 5 years.

One BILD member commented that the same market mechanics do not apply to residential and non-residential portions of mixed-use developments, and the ability to finance them would be a big concern.

- City Planning staff explained that Policy 3.5.1.8 only applies to sites where existing employment spaces will be replaced by a new development, and added that high-density residential development will always outbid other uses.

A BILD member commented that five years ago it was debatable whether another office building would be constructed in Toronto. Today it is debatable whether true mixed-use development is appropriate. There is now a market rationale to invest in downtown office development following the boom in residential development. Some people believe that the market contributes to intelligent decisions, whereas others believe that policy interventions are

necessary. Experience has demonstrated that policy interventions can be counter-productive.

A BILD member commented that mixed-use developments are already happening in certain areas of the City without policy interventions. Introducing a policy to promote certain types of development that are already happening could have negative effects. City Planning should explore policies or tools to facilitate office space in mixed-use developments rather than introducing policies to mandate them.

One BILD member commented that it will be problematic to replace larger, but non-intensive uses like warehouses under Policy 3.5.1.8, as the large square footage incurs an additional financial obligation.

Another BILD member noted that generally speaking, the association does not have a problem with the approach of the draft employment area policies as a policy exercise. However BILD members feel that more consultation between the City and stakeholders is needed.

Counsel for BILD cited an example of a mixed-use development by Monarch on Consumers Road south of Sheppard that is looking for anchor tenants for a new office building. Staff was aware of the site where the developer gained approval for residential towers with a permitted office building acting as a buffer to the business park to the south. Counsel for BILD stated that the reality is there is cheaper office space in the surrounding business park, or in other areas of the City than in a new office building as part of a larger mixed-use development. There is no market demand for this kind of office space. The proposed policy would create a scenario that will depress market prices for office space in the vicinity, and can become a barrier to the construction of new office space in the future. It is also not clear whether a policy to artificially support the creation of office space will contribute to the creation of export-oriented jobs. The type of office space available in a condo will not attract the creative class employers / employees that a brick and beam office space would.

- City Planning staff responded that they have received opposite comments from developers wishing to convert employment lands and proposing both office and residential towers. These developers are willing to build the office space and claim the market is there but the new office towers proposed are predicated on being able to build the residential units. Staff also clarified that there is no emphasis on export-oriented jobs in the policies, just the whole broad range of employment opportunities.

A BILD member suggested that the problem is mandating the replacement of existing non-residential uses in a new development, instead of providing the tools or mechanisms to facilitate and encourage this kind of mixed-use development.

Counsel for BILD stated that they had no major problems with the proposed differentiation of employment area designations or the policies for them. BILD's primary concern was the policy requiring the replacement of office space in

transit-rich areas of the City as part of new residential development.

Action Items	Responsible	Deadline
BILD to provide written comments on draft policies	BILD	March 7

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: South Etobicoke Industrial Employees Association

Date: January 29, 2013	Time: 8:30 a.m. – 10:00 a.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: 60 Birmingham (Campbell's Soup Factory)
Individuals / Organizations in Attendance	<ul style="list-style-type: none"> ▪ South Etobicoke Industrial Employees Association ▪ City Planning ▪ Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- General questions to clarify material presented by City Planning staff;
- The impact of sensitive uses in employment areas on industrial operations;
- General questions about the Official Plan Review process.

Questions and Comments

1. Questions and Comments about the presentation:

It was mentioned during the presentation that the City is planning to re-zone some of its employment areas in order to compete more effectively for offices with 905 municipalities whose employment areas are pre-zoned for different uses. How is pre-zoning different than the zoning designations that are currently in place?

- City Planning staff responded that the density permissions for office sites in employment areas in some of the existing zoning bylaws in Toronto are comparatively low because of the model of towers surrounded by surface parking. Currently, if a developer wants to intensify a property in an employment area, he or she would need to apply for a zoning bylaw amendment which can take up to one year to process. In effect, this slows down office development, even if an application is being prioritized through the City's Gold Star system.

Will the Zoning Bylaw be amended to reflect changes in the Official Plan?

- City Planning staff stated that the current zoning harmonization implements the Official Plan adopted by Council in 2002 and confirmed that the Zoning Bylaw will be updated in the future to reflect any Official Plan changes resulting from the OP Review.

Are the Downsview employment areas under pressure to convert to residential uses?

- City Planning staff explained that conversion requests in Downsview have been limited, most likely because of height restrictions associated with Bombardier's flight paths. The pressure to convert employment lands to residential uses is highest in South Etobicoke.

Referring to the "Where South Etobicoke Employees Live" slide in the presentation by City Planning staff, a SEIEA member commented that the map demonstrates the value and benefit of employment areas particularly to City Councillors who do not have employment areas in their wards.

In terms of manufacturing, do robotics and mechanization generally result in the need for less employment?

- City Planning staff explained that while there is renewed investment in manufacturing, the processes are increasingly automated and employment does not necessarily keep pace with investment and productivity increases.

What is vertical agriculture?

- City Planning staff explained that vertical agriculture is a relatively new urban activity and offered an example from Chicago of an abandoned meat-packing plant that was converted into a multi-storey space to hydroponically grow vegetables.

Referring to the presentation slide 'South Etobicoke – Draft Designations', one SEIEA member inquired why (one area) was shaded white when it should be included in the employment area designation.

- City Planning staff responded that they will review the map and property in question to determine if there is a discrepancy.

SEIEA members were interested to know City Planning's opinion regarding residential intensification along the Gardiner, noting air pollution and noise along the highway corridor.

- City Planning staff responded that the highest concentration of conversion requests in Toronto is along the Gardiner Expressway in Etobicoke. They acknowledged that there is air and noise pollution from vehicular traffic.
- City Planning staff also noted that the development of residential uses adjacent to the Gardiner puts residential in areas where noise and pollution needs to be mitigated by barriers and berms in a location that is valuable to businesses because of visibility and truck access to the highway.
- When City Planning staff have raised these issues with developers, their consultants generally respond that they can meet provincial requirements for noise and emissions.

2. Concerns and Issues with Sensitive Uses:

If a place of worship already exists in an employment area, do manufacturers get any relief from provincial or municipal regulations?

- City Planning staff explained that in their discussions with other stakeholder groups, the issues with places of worship in employment areas arise when a company applies for a Certificate of Approval, as places of worship are considered sensitive uses.
- If a place of worship exists in an employment area and a new industry wishes to locate in the same employment area then perhaps the environmental certificate work should not treat the place of worship as a sensitive use.
- City Planning staff noted that they need to discuss these issues with the Province.

Several comments and concerns were raised from the various stakeholders with respect to the presence of sensitive uses in employment areas.

One SEIEA member explained that the factories she represents operate 24 hours a day, seven days a week. Places of worship are considered a sensitive use by the Province. Land use conflicts often occur when they are located in employment areas as the manufacturer is liable for mitigating air and noise pollution.

Another SEIEA member commented that it costs a lot of money to hire a consultant and identify options to mitigate air and noise pollution, which are not always approved by the Province, due to complaints or the presence of sensitive uses like places of worship. She also noted that places of worship operate during irregular hours and for long periods of time, whereas many SEIEA industries operate 24 hours a day, seven days a week.

- City Planning staff responded that they are familiar with the issue. The solution may be that the Ministry of the Environment take the position that places of worship that choose to locate in employment areas do so knowing the risks and have no protection from industrial impacts.

Another SEIEA member commented that there have also been instances where infill townhomes are being developed in or near employment lands. While the manufacturers located in the employment areas pre-date the new townhomes, they are sometimes unable to get a Certificate of Approval because of noise complaints from the residents.

A SEIEA representative commented that the employment area across from the Ontario Food Terminal, which includes Mr. Christie's Cookie Factory, is of particular importance to SEIEA as one of its members is located there, and should not be opened up for residential uses.

City Planning staff inquired whether 500 m is the distance considered by the MOE when a business applies for a Certificate of Approval.

- SEIEA members responded that if sensitive uses (e.g. hospitals, daycares, or retirement homes) are within 500 m of an applicant's facility, the business will have to complete an acoustic assessment and abide by the noise restrictions at three different times.
- One SEIEA member noted that one of her clients had to limit bulk deliveries to demonstrate compliance with the noise restrictions.

Adding to the comment above, another SEIEA representative noted that if the acoustic assessment determines that background noise (e.g. bus traffic) is louder than truck traffic, then no further action is required. The exception to this is noise from trains passing through railway corridors, which are not considered background noise. Noise abatement is very, very expensive, and ranges from hundreds of thousands of dollars to millions of dollars. These manufacturers rely on trucks to deliver and pick-up goods; it's how they do business.

City Planning staff noted that sensitive uses located in employment areas negatively impact manufacturers by limiting the hours of operation for truck traffic and increase costs because of the need for equipment to mitigate noise and air pollution. City Planning staff also commented that it is odd that places of worship are treated the same way as residential uses given that people do not usually live on site. City Planning staff intend to bring these issues and concerns to the attention of the MOE.

3. Questions about process

Referring to the Official Plan Review window for conversion requests, a SEIEA member asked who has more decision-making power - City Planning or City Council?

- City Planning staff responded that decisions are made by City Council and are based on the recommendations of Planning staff; i.e. planning staff don't have decision-making authority. The Ontario Municipal Board, however, has the ability to consider appeals 'de novo' and can reverse Council decisions.

Can City Council overturn a recommendation made by Planning Staff?

- City Planning staff responded yes.

Several comments were made noting that the protection of employment lands is a priority for SEIEA members. Several members stated that they generally support the draft policies and plan to attend the Public Open Houses to further lend their support.

Action Items	Responsible	Deadline
SEIEA to provide written comments on draft policies	SEIEA	March 7

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Leaside Business Park Association

Date: January 30, 2013	Time: 10:00 p.m. – 12:00 p.m.
Note Taker: Lily D'Souza, Lura Consulting	Location: Metro Hall, 55 John St., 22 nd Floor Boardroom
Individuals / Organizations in Attendance	<ul style="list-style-type: none"> ▪ Leaside Business Park Association ▪ City of Toronto: City Planning, Economic Development ▪ Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- General questions to clarify material presented by City Planning staff;
- Concerns about the encroachment of non-industrial uses in industrial areas;
- Appending properties in employment areas for future development of non-industrial uses.

Questions and Comments

1. Questions and comments about the presentation

What is the status of the conversion requests that have been submitted to date?

- City Planning staff responded that 115 requests have been received to date. Due diligence was completed on 65 of the conversion requests, and staff reported to City Council on these in Fall 2012. City Planning staff also noted that the Official Plan Review / Municipal Comprehensive Review is the only window of opportunity for landowners and developers to request a land use conversion.

How does City Planning evaluate each conversion request?

- City Planning staff responded that staff from City Planning and Economic Development evaluate each conversion request on a site by site basis using criteria outlined by the Province in the Growth Plan.

One LBPA representative commented that the draft employment uses policies encourage employment and residential development near existing or approved rapid transit stations. In the case of Sheppard Avenue, residential development will be near or in employment areas which is of concern to the LBPA.

Does the Gold Star program include zoning amendments? How is the program working?

- City Planning staff responded that the Gold Star program is intended to expedite the application process.
- Economic Development staff added that a team of City Planning, Economic Development and Toronto Building staff review applications to expedite the process and resolve issues proactively. However the process is part of a regulatory system; staff cannot cut corners.

What are the criteria for the policy that requires the replacement of office uses in redevelopment projects? Should the new office space be in the same centre, within walking distance, on-site or off-site?

- City Planning staff explained that while the policy requires the replacement of office uses in the downtown, centres and within walking distance of rapid transit stations, it is written to provide the developer with flexibility to establish the replacement space on-site or nearby.

In terms of the King / Spadina area, do the draft employment uses policies address the physical form of future development?

- City Planning staff responded that physical form is addressed in the Tall Building Guidelines and area urban design guidelines, not the draft employment uses policies.

Referring to the 5% vacancy statistic, one LBPA member commented that it is skewed as industrial uses are being replaced by retail and smart centre uses which are not the same. The member also commented that local transportation issues are affecting access to manufacturing and warehousing sites.

Have you addressed distribution centres in the draft policies? Are you concerned about them?

- City Planning staff responded that although distribution centres are not specifically addressed in the draft policies, they are concerned about them. Staff noted that there are some areas left near the airport that would be suitable for distribution centres.

What does the term 'business park' refer to? Is it the same as commercial? The connotation is that manufacturing uses are not equated to office uses.

- City Planning staff explained that the term refers to employment areas that are primarily office oriented, such as the Consumers Road business park. The term is not a separate designation. It is meant to convey that there are different types of businesses; however both office and manufacturing uses are considered to be core employment area functions. Area specific policies for the City's business parks will be included in Chapter 7 of the Official Plan to help introduce amenities in the City's business parks in order to promote and support the retention of office uses within them.

A LBPA representative noted that there has been a history of illegal apartments replacing outgoing industrial uses in Leaside. The City has a poor history of zoning bylaw enforcement. Developers need to be told that they cannot breach the Official Plan designations.

- City Planning staff explained that they would need to check with Zoning about requirements and what is happening on the ground in Leaside.
- City Planning staff verified that the LBPA would like more specificity that guides the implementation of the Official Plan at the zoning level.

What feedback are you getting from other business parks and stakeholders?

- City Planning staff responded that they have met with several other stakeholders including the South Etobicoke Industrial Employees Association, who did not express any concerns with the core designation.

An LBPA member commented that policies to protect and preserve industrial and manufacturing employment areas require 'more teeth' to prevent appeals to the Ontario Municipal Board. The long-term growth of the City depends on protecting employment lands, particularly for 'dirty' industrial uses (e.g. landscaping, cement and asphalt). Without well-defined protectionist policies, industrial and

manufacturing employment areas will eventually disappear.

How will retail uses (e.g. 'mom and pop' establishments and restaurants) be regulated in employment areas?

- City Planning Staff explained that regulating approved uses on the ground is a question of zoning, and not addressed in the draft employment uses policies.

City Planning is recommending the retention of 98% of the City's employment lands, how much is City Council going to approve?

- City Planning staff responded that they cannot predict City Council's decision but that Council has been supportive of the goal of protecting employment lands when the draft policies were considered by them.

An LBPA member commented that he is not convinced that the draft employment uses policies are sufficient to preserve employment lands. The 'big chunk of pie that is purple' is too large, and too general.

- City Planning staff explained that the intent of the core, general and retail employment areas is to prevent 'creep' back into core areas. For instance big box retail will not be permitted in core employment areas. If a landowner wants to develop big box in a core employment area, there will be a policy requiring a conversion application during a municipal comprehensive review of the Official Plan. The gradations in the draft employment areas provide more specificity on the map as to where non-industrial uses may or may not be permitted.

2. Impact of office, residential and retail uses on industrial employment areas

An LBPA representative expressed concern that since core employment areas include office and manufacturing uses, office uses will eventually displace or replace manufacturing uses. The trend in office development, where land owned by a single firm is developed at a higher density and leased to multiple firms, drives up the price of land to the point that industrialists and manufacturers are forced out of the market.

- Economic Development staff noted that it may be beneficial to separate the office and manufacturing uses within employment areas. The issue is the growth of office versus the non-growth of industrial, and the need to maintain land for manufacturing / industrial activities.
- City Planning staff added that the trend is being observed across different land use designations throughout the City, and is not limited to employment areas.
- Economic Development staff added that there will always be some level of land speculation occurring in the City.

The LBPA is concerned about encroaching residential development into Leaside's industrial properties. Can developers / landowners interested in converting employment land to non-employment uses appeal a decision to the OMB if the City refuses their request?

- City Planning staff responded no, and explained that once the City refuses the conversion request, the developer / landowner cannot appeal the decision under changes to the Planning Act made in 2007. The exception is during an Official Plan Review / Municipal Comprehensive Review, which offers developers / landowners with a window of opportunity to request a land use conversion and appeal the decision if they are unsatisfied with it.

An LBPA representative commented that non-pocketbook issues, for example truck traffic, complaints from residents, and a slow planning approvals process, are the often the real reasons why industrialists choose to relocate outside the City, not property tax rates.

Was transportation looked at as part of developing the draft policies? The LBPA has raised transportation as an issue to the City several times. The ISP plant, for example is closing in June, because companies trying to avoid traffic issues won't deliver to them at certain times anymore.

- City Planning staff explained that transportation is being examined by our Transportation planners as part of the Official Plan Review process.
- City Planning staff also noted that they are aware of the significance of transportation routes and traffic to manufacturers and industrialists, particularly to move goods and employees. In terms of conversion requests, on a site by site basis, City Planning is looking at the importance of preserving the transportation networks to the surrounding industries.

An LPBA member commented that in terms of transportation, the issue is getting into Leaside, and then once in, the issue becomes getting around within Leaside. It's a problem for businesses that depend on the movement of goods by trucks, and new users, mostly shoppers who are unsympathetic to the existing industrial activities. Traffic issues are a constant concern, and not limited to just the weekends.

- Economic Development staff noted that they will send the LBPA a recent report that explores how the City can achieve economic growth at an interdivisional level. The City recognizes at a broader level that transportation is a key driver of employment development.

An LBPA member commented that the LBPA is concerned about the encroachment of non-industrial uses in employment areas zoned for industrial, particularly because the impact on land values. There is also a need to specify what employment entails.

3. Appending properties

What is being done to prevent the amalgamation of properties? There is a need to prevent the amalgamation of properties that may later be converted into non-employment uses.

- City Planning staff explained that the delineation of the different employment area designation areas will determine how the properties can be used.
- The LBPA is concerned about a particular Smart Centre on Wicksteed Avenue where a developer bought a 100 foot frontage on Laird to get the necessary retail designation. Will the zoning bylaw be changed to have minimum frontages and depths to physically quantify this problem?
- City Planning staff explained that each conversion request is considered on a site by site basis. If a developer purchases land with the intention of appending it to another parcel of land, under the draft employment uses policies the uses permitted would govern what could be built on the appended parcel. If for example the property appended was a Core Employment Area and the proposed use was major retail, permitting the major retail, under the draft OP policies, would require a conversion request at the time of the municipal comprehensive review of the Official Plan. This is to prevent the 'creep' of secondary employment uses into core areas, which has been occurring under the current

Official Plan that only has one employment area designation. The property in question would also be subject to the conditions outlined in the zoning bylaw.

An LBPA member commented that the draft employment uses policies should include a statement noting that employment lands should be preserved and protected from conversion to non-employment uses such as residential or retail development.

- City Planning staff explained that the draft employment uses policies propose to replace one employment area designation with three. Retail uses would be permitted in the draft retail employment area designation and major retail also permitted in the draft general employment area designation.

Are core employment areas a line in the sand?

- City Planning staff affirmed that they are.

Action Items	Responsible	Deadline
LBPA to provide written comments on draft policies	LBPA	March 7
City Staff to verify zoning requirements for manufacturing / office	City	ASAP
Economic Development staff to send transportation study to LBPA	City	ASAP

City of Toronto Official Plan Employment Uses Policy Consultations

Stakeholder Meeting Summary: Toronto Association of Business Improvement Areas

Date: January 30, 2013

Time: 2:00 p.m. – 3:00 p.m.

Note Taker: Lily D'Souza, Lura Consulting

Location: Metro Hall, 22nd Floor, Small Boardroom

Individuals / Organizations in Attendance

- TABIA
- City of Toronto: City Planning
- Lura Consulting

Key Items Raised

The key issues and concerns raised during the discussion focused on:

- General questions to clarify material presented by City staff;
- The impact of the proposed retail area designation on traditional retailers ('mom and pop' operations);
- Conversion requests.

Questions and Comments

1. Questions and comments about the presentation

Referring to the policy intent to promote office development near rapid transit, one TABIA member commented that it would be helpful if the City led by example. He noted that the East York and Etobicoke civic centres are not located on rapid transit lines.

Does the policy requiring the replacement of non-residential uses in new residential developments only apply to mixed-use areas?

- City Planning staff responded that the draft policy is specific to mixed-use areas, centres, properties within walking distance to a rapid transit station and identified regeneration areas and does not apply to the City's employment areas where residential uses are not permitted.

What happens after 2031 when the supply of employment land in Toronto is depleted?

- City Planning staff responded that the Malone Given Parsons report anticipates that the City will exhaust its supply of employment lands after 2031. One would anticipate better use of our limited employment lands in the future such as higher-density development and intensification of use of employment lands with employment uses.

Perhaps the proposed employment area designations (core, general, and retail) should be rated – some land uses are more important than others.

- City Planning staff responded that City Planning recognizes the value of Toronto's finite employment areas. If they are converted to non-employment land uses, it is nearly impossible to reclaim them for employment uses in the future. City Planning staff also explained that each municipality is required to review its employment lands policies every five years per provincial legislation, and added that their recommendation is to retain 98 percent of the City's employment lands.



At what point do we start identifying our five year threshold? Liberty Village, for example, is a prime employment area where demand for space exceeds supply. Perhaps we need to consider employment activities that fit into this pattern of development. Perhaps the employment uses policies shouldn't be so black and white.

- City Planning staff explained that they are currently exploring mechanisms to promote employment and residential uses in high density developments while ensuring the employment uses are actually constructed.

Referring to the policy to support office development near rapid transit, one TABIA member commented that employment lands lack transit because voters support transit development in their neighbourhoods. She emphasized that public transit is important to the City's economic development, and that perhaps the business community should contribute financially.

- City Planning staff agreed that investing in public transit is a City priority.

A TABIA member commented that the draft employment uses policies need to define employment. The policies should acknowledge that a 'job is a job is a job', and that the future of employment depends on supporting the development of small businesses. The policies should support the needs of small businesses as they evolve.

2. Impact of proposed retail area designation on traditional retail

Will the proposed retail employment area designation include BIA retail establishments? My interpretation of this policy is that it will be easier to develop big box retail establishments like Wal-Mart and Target than traditional 'mom and pop' retail establishments.

- City Planning staff responded that big box retail establishments can be developed in Employment Areas only if they are located in the draft retail employment area designation. Retail is also permitted in mixed-use areas, however there is an issue of compatibility with residential uses. Many big box retail establishments are already permitted through the current Official Plan. The intent of the draft employment uses policies is to clarify where big box retail establishments are permitted within the context of the City's employment lands.

One TABIA member commented that it is problematic if the primary function of retail uses in an employment area is to support employment (i.e. they can only operate during the business hours of the surrounding businesses/employers) as landowners may not be able to compete with businesses/retailers in other areas.

A TABIA member explained that employees who work in Liberty Village also want to go out for lunch or shop in the area. Liberty Village has transitioned from an employment area to a neighbourhood. There is a need for complementary land uses to support the neighbourhood that Liberty Village has become. Incremental decisions by City Council 'doomed' Canada Bread as a site.

- City Planning staff responded that creative class industries are where employment is growing. City Planning recognizes that new technology is welcome and thriving in the City.

Another comment was made noting that TABIA is concerned about the impact the

proposed retail area designation will have on traditional main street retail. Supporting the development of big box retail could be a dangerous path for the City to follow. How many more power centres do we need? Dundas, south of the Junction is no longer viable as a traditional retail area because of the impact of big box retail in the surrounding area. There are some vacant storefronts in Bloor West Village, but the area is a destination in and of itself that is far enough from the closest power centres to withstand their impact. The proposed 'general' and 'retail' designations could have serious impacts on traditional retail unless there are provisions in the policies to protect them. Warehouses, owned by companies like Amazon, will be the next thing to move in.

3. Conversion Requests / Applications

To be clear, what does converting mean?

- City Planning staff explained that 'converting' refers to requests to change an employment land designation to non-employment uses such as residential or institutional.

Is City Planning generally saying 'no' to the conversion requests in an effort to preserve the employment lands?

- City Planning staff responded that was generally correct, especially in employment areas where there are impactful industries with respect to the preliminary assessments of the first 65 conversion requests reported to Council.

How do you determine what an impactful use is? Canada Bread used to be located in Liberty Village, its location was land locked and had traffic issues.

- City Planning staff explained that each conversion request is reviewed by teams of Economic Development and Planning Staff. Due diligence is undertaken, including site visits and interviewing surrounding industries to help determine impactful uses whose operations may be affected.

Action Items	Responsible	Deadline
TABIA to provide written comments on the draft policies	TABIA	March 7

Welcome



Official Plan Review – Employment Lands Consultations

Afternoon
Session

Agenda

Evening
Session

Open House

6:30 p.m.

Welcome & Introductions

7:00 p.m.

Overview Presentation

City of Toronto planning staff will provide an overview of
Toronto's economic health and draft policy changes.

7:10 p.m.

Questions of Clarification

7:30 p.m.

Discussion

The following questions will help guide the conversation:

7:45 p.m.

- What are the strengths of the draft policy changes regarding
Toronto's Employment Lands?
- What issues or concerns (if any) do you have with the draft
policies?
- What policy changes would you suggest?

8:50 p.m.

Next Steps

discussion of

APPENDIX D – Public Open House Summaries



City of Toronto Official Plan Review – Draft Employment Lands Policies Public Open House #1

*Etobicoke Civic Centre, Council Chambers
Tuesday, February 12, 2013
3:00 p.m. – 5:30 p.m. and 6:30 p.m. to 9:00 p.m.*

Public Meeting Summary

Four Public Open House meetings were organized by City Planning to inform participants of the proposed changes to the Official Plan's employment uses policies and seek feedback. The meetings encouraged broad public participation in the development of the City's employment lands policies, and included several opportunities for participants to provide comments and feedback. The following provides a summary of the feedback collected from Public Open House #1.

Attendance	33 (afternoon), 18 (evening)
Presentation	Paul Bain

Questions and Answers - Afternoon Session

- Q. It was stated during the presentation that 98 percent of the City's existing employment lands will be retained. Are the 115 conversion requests included in the 2 percent of employment lands that are proposed to change?
- A. City Planning reported on 65 of the conversion requests to Council in November 2012. The recommendation to retain 98 percent of the City's existing employment land area is based on the November report. A new figure may be recommended once due diligence on the remaining conversion requests has been completed, but it will not be radically different.
- Q. In terms of acreage how much of the City's existing employment lands are affected by the 115 conversion requests/applications?
- A. Approximately 3 percent of the City's employment areas are affected by conversion requests, but the total acreage of conversion requests is not the critical factor. The issue is the viability of existing employment uses in adjacent areas, and whether they are compatible with the proposed land use. There is a finite amount of employment land in the City of Toronto, every parcel counts. The long-term impact on the remaining employment lands also needs to be considered.
- Q. What metrics are you using to determine how much employment land is enough?
- A. It depends on whether the analysis is short-term or long-term. There is sufficient land for employment uses available until 2031, beyond 2041 there is not enough. The Malone Given Parsons report, which is available online, describes the metrics that were used in the study.
- Q. How has City Council responded to the consultant's report that suggests Toronto will have an insufficient supply of employment lands after 2031?
- A. City Council understands the general need to preserve employment lands and mitigate



potential land use conflicts between incompatible uses.

Q. Is there a mechanism in place to sever a particular parcel of land/property that is currently designated for employment, and evaluate it individually for the purposes of conversion?

A. City Planning is evaluating every parcel of employment land in the City.

Q. Can City Planning designate Judson St. as a regeneration area?

A. City Planning is studying the area, based on a request from City Council.

Q. Does the draft policy that requires the replacement of existing office space on a site that is being redeveloped apply to all employment areas?

A. No, the replacement policy applies to sites in the downtown Core, Centres and Waterfront. The policy intent is to replace employment uses if they already exist on a site where new development is proposed.

Q. After the Official Plan Review and Municipal Comprehensive Review are completed, who makes the final decision? How much power does City Planning have over the Ontario Municipal Board?

A. The recommendations prepared by City Planning will be considered by City Council. The City does not have any authority over the OMB, it is a provincial body.

Q. What is the status of the conversion request at the Mr. Christie bakery site?

A. There has been a motion at the City to recognize a working group of Economic Development and City Planning staff as well as workers from Mr. Christie to develop a framework for analysis. The conversion request is still under review.

Evening Session – Questions and Answers

Q. How many of the conversion requests have been reviewed by City Planning? Can the applications that have been refused be appealed to the Ontario Municipal Board?

A. City Planning reported on 65 of the conversion requests to Council in November 2012. The only time a conversion request can be appealed is during an Official Plan Review/Municipal Comprehensive Review if the policies or designations are amended.

Q. Can the property owners or developers of a site where a conversion request was refused submit a new application for a conversion request during the next Official Plan Review?

A. Yes, they can, unless the law changes.

Q. Has City Planning done a study to determine how many jobs will be lost if conversion requests are approved?

A. City Planning does maintain a record of the number of employees for each conversion site, however it is a number that keeps changing.

Q. How was the distinction between the scales of retail uses determined in the 'General' and 'Retail' employment areas?

A. Every inch of the City's employment lands were reviewed, including existing retail uses in employment areas. We realized that a lot of the existing retail uses are not recognized in the current Official Plan. Retail is serving a purpose; the need for land for retail uses will increase as the City's population continues to grow. However, retail

will not be permitted in all the proposed employment areas. We have received some feedback indicating that some businesses don't meet the criteria for major retail because of the way retail uses have been divided in the 'General' and 'Retail' employment areas of the draft policies. We need to determine if there is a functional difference in the impact of retail permissions between the designations.

- Q. Should density and parking requirements be decided on a site by site basis?
Developing a power centre on St. Clair Avenue is not the same as developing a power centre in Etobicoke.
- A. In the feedback we have received to date, there has not been resistance from retail developers with regard to the policy. The reason may be that it is in sync with what they are building. City Planning has received several applications for multi-story retail development. The reason for this may be that land in the City is getting increasingly expensive.
- Q. If the City is replacing well paying manufacturing jobs with retail jobs that pay minimum wage, where are people going to live?
- A. Manufacturing is starting to come back in terms of investment; we are starting to see the repatriation of manufacturing from overseas. The jobs are not necessarily following the investment as there are fewer workers per square foot due to the mechanization of manufacturing processes. The MGP report indicates that the future of employment is in office development. The intent of the policies is to retain the City's employment lands as a base for diverse employment opportunities.
- Q. How is City Planning going to address the presence of a cement factory directly next to a residential neighbourhood on Judson St.?
- A. The site of the concrete batching plant is being reviewed as part of this process. The regeneration study for the area will provide an opportunity to circle back and present a long-term vision of the site that is compatible with the objectives of the draft policies. Your concerns will be brought to the attention of City Planning's legal team. To be clear, zoning for the site permits the concrete batching plant as a legal non-conforming use. If the plant leaves, another one will not be permitted.
- Q. Why does City Planning want to protect employment lands that are completely surrounded by condominiums such as the Mr. Christie and Nestle factories?
- A. If you look at the sites on a map, they are not isolated. There are employment uses surrounding the Nestle factory. There are in fact some conversion requests in the vicinity, but it remains a viable employment area. The Ontario Food Terminal is the use north of the Mr. Christie site.
- Q. Is the current demand for office space higher than the supply of office space?
- A. There is a shortage of certain classes of office space. For instance, there is a shortage of Class B office space in certain areas of the City. There is a fair bit office development in the application pipeline, particularly outside the Financial District in the downtown core.
- Q. New offices will attract new residents. Will this result in more conversion requests?
- A. Not necessarily. There is no shortage of condominium applications in the downtown core. Office development is also taking account of a younger, more mobile and educated labour force.
- Q. What factors dictate how much parking is required for an industrial property?

- A. The number of parking spots depends on the land use and is prescribed in the Zoning Bylaw. Formulas for different uses are based on transportation analyses.

Feedback from Small Group Discussions

1. What are the strengths of the draft policy changes regarding Toronto's Employment Lands?

Afternoon Session:

- Gradation of employment uses (core, general, retail)
- Retail and institutional uses as a buffer between employment areas and surrounding non-employment uses.
- Promoting office development near transit.

Evening Session:

- Policies that separate core and general employment functions.

2. What issues or concerns (if any) do you have with the draft policies?

- Potential for incorrect interpretation of policies as a result of confusing terminology (e.g. 'core' can refer to function or geography).
- Impact of power centres and large-format retail uses on existing infrastructure and traditional retail establishments.
- Intent of the policies – preservation of jobs or space?

- Functional impact of dividing retail uses in 'general' and 'retail' employment areas.
- Closure of factories and job losses as a result of conversion requests.
- Existing land use conflicts, e.g. cement factory adjacent to residential neighbourhood.
- Concern about requiring tiered parking structures across the board in employment areas.

3. What policy changes would you suggest?

- Clearer definition of 'core' employment uses.
- Clarification to distinguish between 'general' and 'retail' employment areas.
- Integration of ecological perspectives in the policies.

- Integration of green building policies to encourage low-impact development.

4. Other

- City's future (in)ability to adapt to changes in the global economy, and technology.

- Concern with the rate of intensification occurring throughout the city.

City of Toronto Official Plan Review – Draft Employment Lands Policies Public Open House #2

*Scarborough Civic Centre
Thursday, February 14, 2013
3:00 p.m. – 5:00 p.m. and 6:30 p.m. to 8:00 p.m.*

Public Meeting Summary

Four Public Open House meetings were organized by City Planning to inform participants of the proposed changes to the Official Plan's employment uses policies and seek feedback. The meetings encouraged broad public participation in the development of the City's employment lands policies, and included several opportunities for participants to provide comments and feedback. The following provides a summary of the feedback collected from Public Open House #2.

Attendance	23 (afternoon), 11 (evening)
Presentation	Jeffrey Cantos

Questions and Answers - Afternoon Session

- Q.** Does the investment data in the presentation image of Toronto's healthy employment areas include both industrial and commercial office activities? Is there also investment in the industrial sector?
- A.** Yes, the graphic includes both industrial and commercial uses in the City's employment lands. There has been recent investment in industrial and manufacturing activities in Scarborough including Elizabeth Grant Cosmetics, and a new Fed Ex facility that is being developed on vacant land. Two construction recycling facilities will also be locating on a previously vacant site. A factory that manufactures powdered milk for export to China recently opened in Scarborough as well.
- Q.** Why aren't the transit nodes identified in the Growth Plan for the Greater Golden Horseshoe depicted in any of the maps shown in the presentation?
- A.** The City is simultaneously undertaking consultations on its transit policies as part of the Official Plan and Municipal Comprehensive Review. Policies for transit and employment are being reviewed concurrently in the Official Plan Review process.
- Q.** Which proposed designation for employment areas would apply to automobile dealers?
- A.** Automobile dealers would be permitted in the General and Retail employment areas-- in 20 percent of the employment lands. Most existing dealers are covered under these two designations.
- Q.** Why are there only four regeneration areas throughout the City? Shouldn't there be more?
- A.** Regeneration areas are not a new designation, they already exist in the Official Plan. The employment lands that are being proposed to be redesignated to a regeneration area designation share several common traits: small and isolated employment areas, low employment, rapid transit station nearby, existing permission or presence of residential uses, and vacant lands.
- Q.** Does 'core' refer to geography or function?
- A.** While the term can mean function or geography, the policy focuses on core employment functions. But most are also found in the interior of employment areas.



- Q.** What is the designation for Eddystone Avenue under the draft policies?
A. The designation in the draft policies is 'Core Employment Area'.

Evening Session – Questions and Answers

- Q.** Is the picture of Toronto's economy a little too optimistic? Is retaining 98 percent of the City's employment areas enough to support sustained economic development?
A. Toronto's economy is relatively diverse and healthy. It recovered from the recession at a quicker rate than the rest of Ontario. Jobs are being added to the City's economy at a better rate than the national and provincial economies. There is never enough economic development, but the economy is growing.
- Q.** Is the current rate of population growth sufficient to meet the Province's population forecast for Toronto?
A. The Provincial forecast for the City's population, 300,000 by 2031 is modest. That's a little over 15,000 to 17,000 a year, which is not a huge amount for a City of this size.
- Q.** What will happen in 30 to 40 years when the City's supply of employment lands has been exhausted?
A. We can never be confident about predicting the future. When we ran out of land for low-scale residential development, the nature of residential development intensified. One would expect lower density employment areas to be redeveloped and intensify when employment land runs out. It is a good reason to encourage more intense development in our limited employment lands today.
- Q.** The Ontario Municipal Board (OMB) typically favours developers over the City - what role does the OMB play in the approval of these policies?
A. When we took a look at one year of applications to the City, of the 20 per cent that were litigated at the OMB, developers won 55 percent of decisions, and the City won 45 per cent. Changes to the Official Plan policies are recommended by City Planning to Council. When the policies are approved by Council they are submitted to the Ministry of Municipal Affairs and Housing (MMAH) for review and approval. Anyone can appeal the decision of the Provincial Minister. We do anticipate an OMB hearing on the employment land policies, designations and conversion requests.
- Q.** Do the draft employment lands policies consider surplus TDSB properties that are potential sites for residential development?
A. Very few TDSB schools are located in Employment Area designations. The largest number of schools are on land designated as Neighbourhoods. Each surplus school would be the subject of a site specific review. There are certainly opportunities for future infill or redevelopment on school sites of a nature that would meet their Official Plan designations.
- Q.** Is housing for seniors considered an employment use?
A. Seniors housing is a residential use and is a sensitive use whose presence could affect the ability of existing businesses to operate should there be any complaints to the Province under the Environmental Protection Act. Residents who are seniors are also sensitive to noise, odours and emissions just like any other residents.
- Q.** Is City Council proposing to increase development charges for non-residential properties by 83 percent?
A. This is the first we have heard of this so we cannot speak to that figure. There are currently no development charges on office or industrial developments, but you may be talking about retail.

Feedback from Small Group Discussions

5. What are the strengths of the draft policy changes regarding Toronto's Employment Lands?

Afternoon Session:

- Gradation of employment areas that recognize different types of employment activities and uses.
- Greater definition and clarity of employment uses in proposed designation areas.
- A lot of good work has been done as the basis for policy development.

Evening Session:

- Encouraging building design with service access at the back, and not from main roads.
- Policy intent to retain and promote diverse employment opportunities (including factory jobs).

6. What issues or concerns (if any) do you have with the draft policies?

- Impact of new LRT transit lines on truck traffic moving in and out of employment areas on Sheppard Avenue East.
- Intent of draft policies to preclude residential and institutional uses from employment areas. Sheppard East BIA supports the development of residential uses (e.g. long-term care facilities) on main streets and major streets in employment areas along the LRT route. Requiring parking structures for large-scale stand-alone retail and power centres is fine downtown but is not practical in the outer suburban areas of the City.
- The removal of the Avenue designation from Sheppard Avenue East where it overlays employment areas may be premature. The intensification study for the LRT corridor may find that residential uses are desirable in the future. The timing of the LRT corridor intensification study may not be in synch with a municipal comprehensive review.

- Incompatible / impactful industrial uses in employment areas (e.g. uranium processing facility).
- Impact of retail uses in employment areas negatively affecting core functions (e.g. traffic and speculative land pricing).

7. What policy changes would you suggest?

8. Other

- The acreage of employment lands that are the subject of conversion requests is a small fraction of the total land area in the City.
- Industrial activities cannot exist in isolation; they rely on complementary and supporting uses such as retail.
- Concern that current incentive policies may enable the City to favour one employment activity over another.



City of Toronto Official Plan Review – Draft Employment Lands Policies Public Open House #3

*North York Civic Centre
Tuesday, February 19, 2013
3:00 p.m. – 5:30 p.m. and 6:30 p.m. to 9:00 p.m.*

Public Meeting Summary

Four Public Open House meetings were organized by City Planning to inform participants of the proposed changes to the Official Plan's employment uses policies and seek feedback. The meetings encouraged broad public participation in the development of the City's employment lands policies, and included several opportunities for participants to provide comments and feedback. The following provides a summary of the feedback collected from Public Open House #3.

Attendance	29 (afternoon), 11 (evening)
Presentation	Gerry Rogalski

Questions and Answers - Afternoon Session

- Q.** What is the relationship between the Official Plan policies and the Zoning Bylaw?
- A.** The Official Plan and Zoning Bylaw are both land use planning instruments. Under the Planning Act when a new or revised Official Plan is enacted, the Zoning Bylaw must be amended to implement it within a few years. Right now the City has one Official Plan but 41 pre-amalgamation Zoning Bylaws. The City is in the midst of re-enacting a harmonized zoning bylaw for the whole City that will also implement the Official Plan Council adopted in 2002. When the Official Plan amendments from this Official Plan Review come into force, the harmonized citywide Zoning Bylaw will be amended to reflect them.
- Q.** Will the draft employment lands policies encourage the replacement of activities with few employees from employment areas (e.g. used-car lots)?
- A.** The employment lands policies encourage intensification of employment uses. However, if those low-employment activities were established legally, they are permitted as legal non-conforming uses.
- Q.** What happens if there is no demand for large-scale retail in an area that has been designated for retail uses? What is the difference between Retail Employment Areas and General Employment Areas?
- A.** The Retail and General Employment Area draft Official Plan designations also permit the office, manufacturing, warehouses, wholesaling that are permitted in the Core Employment Area designation—not just retail uses. We have received comments questioning the functional difference between the 'General' and 'Retail' employment areas. The only real difference between the two draft designations is that the 'Retail' designation permits retail of all forms and scale while only big box and power center retail is considered in the proposed General Retail designation. There has been questioning whether it matters if the retail is in a big box or a series of smaller stores in terms of impacts such as traffic. We will be evaluating whether the designations should be merged.
- Q.** Emery Village BIA encompasses a large employment area. BIA members are concerned about the impact of the new Finch Avenue West LRT upon trucking access. Do the draft employment lands policies take into consideration the impact of future public transit



projects on employment areas?

- A. City Planning has been working with Transportation throughout the Official Plan Review process. An Intensification Corridor Study will be completed on the transit route, which will evaluate land use along the corridor. There is some question of timing between the intensification corridor study and a municipal comprehensive review—which is the only time employment lands can be converted.
- Q. Will the draft employment lands policies recognize existing major retail uses if they are located outside the 'Retail' or 'General' employment areas?
- A. You bring up a good point. We tried to ensure all of them were in the Retail and General Employment Areas. It could be worth grandfathering major retail uses or ensuring they are all in the Retail and General Employment Area designations.
- Q. Is City Planning going to include an exhaustive list of sensitive land uses as part of its Official Plan review? Are places of worship considered employment uses?
- A. We will be meeting with the Province to discuss sensitive uses, which are currently defined in Provincial guidelines. The Province treats residential and some non-residential uses such as places of worship, schools and recreational uses as sensitive uses to be distanced from employment uses. Places of worship are not considered employment uses.
- Q. Is City Planning only reviewing the lands that are currently designated for employment, or are you also considering adding new employment areas? There are several industrial sites that are not included in the mapping.
- A. Nearly ninety percent of manufacturing and warehousing uses are located in employment areas. Industrial and manufacturing firms are also found in the Regeneration Area designation. But most of these are being converted to Brick and Beam office buildings over time.

Evening Session – Questions and Answers

- Q. It appears from the initial preliminary assessment of conversion requests that the employment area designation will be changed only where there are existing or potential land-use conflicts between employment designations and surrounding designations. Will all the other employment areas be protected from conversion to non-employment uses?
- A. In November 2012, the report to Planning and Growth Management Committee contained preliminary assessments of the first 65 conversion requests. Clearly the vast majority of the employment areas will be retained and so will a majority of the sites with conversion requests be recommended to be retained as employment areas. Each conversion request is being considered and given due diligence by a team of planners and economic development officers.
- Q. How does the Avenues designation affect an employment area?
- A. The Avenues is an overlay, not a land use designation. Where there is an Avenue overlay Avenue studies have been ongoing which examine how the mixed use areas within the Avenue can be intensified and what improvements are necessary along its entire length. There was an OMB decision in North York that came to the conclusion that an Avenue overlay inferred a residential permission, even where the underlying land use designation was 'Employment Area'. The City disagrees with this interpretation and is proposing to remove the Avenues overlay on lands designated as employment areas because of that OMB decision.
- Q. Residents are concerned about two conversion requests on the Sheppard Avenue frontage of the Consumers Road business park. The concern is that the land is not set up for residential intensification and will impact single family homes north of the Sheppard Avenue.
- A. Mixed-use development is recommended along Sheppard Avenue, but a policy is

proposed that in addition to residential there would be a net gain of employment floor area as well. There has already been residential approval on Sheppard through the OMB decision we have just discussed. The Consumers Road Business Park will be the focus of a revitalization study and additional uses such as retail, restaurants and entertainment are proposed to be permitted to amenitize the area and make it more attractive for office workers.

- Q.** Land use designations impact land values. What is the price difference per square foot between land designated as residential versus the same amount of land designated as employment?
- A.** It depends on the location within the City. Converted employment lands near high-value residential areas would be more valuable than those that are not.
- Q.** Does the Municipal Comprehensive Review include a process to grandfather existing land uses (e.g. a school attached to a place of worship)?
- A.** If the land use was established legally, it is permitted to stay as a legal non-conforming use. Grandfathering means legalizing uses that existed before the Official Plan Review and would permit building expansions.
- Q.** Is the intent to promote office development in employment lands a deliberate attempt to decentralize office jobs throughout the City, or to promote office uses as manufacturing declines?
- A.** There is a recognition that the majority of new jobs in the City in the coming decades will be office jobs and there is a need to accommodate them. According to a study published by the Canadian Urban Institute, up to 100,000,000 sq. ft. of new office space will be developed in the Greater Toronto Area in the next thirty years. It would be a serious road congestion problem if the majority of this new office space is developed in automobile dependent office parks. The policy intent of the proposed OP policies is to encourage office development in transit rich areas, especially those within Toronto. There has been reinvestment in manufacturing, and output has been rising in recent years, but the jobs are not following at the same rate due to increased use of robotics and mechanization.
- Q.** Why isn't the City promoting mixed-use development in employment areas?
- A.** City Planning actively promotes mixed commercial-residential development in Mixed-Use and Regeneration Area designations—particularly in the Downtown, Centres and Avenues that are well-served by transit. But we do not promote residential uses where the operations of businesses will be affected by the introduction of sensitive uses.
- Q.** Does City Planning consider a retirement residence as a permissible use in an employment area?
- A.** No, a retirement residence is a residential use and is not permitted in an employment area. Seniors are just as sensitive to noise, odours and emissions. There is an example of this kind of conversion request that we reported out in November 2012 at 185 Yorkland Blvd.
- Q.** How does the Provincial Policy Framework impact the employment lands policies?
- A.** This project is being carried out in response to Provincial acts and policies. The City is required to review its Official Plan policies at least every five years under the Planning Act and that review must encompass the City's policies and designations for employment lands. The Provincial Growth Plan and Provincial Policy Statements provide that Official Plan Review/Municipal Comprehensive Review is the only time that employment lands may be converted to non-employment purposes and a window of opportunity exists for landowners to apply for a conversion, and if there are amendments the right to appeal to the OMB. The City's policies must always implement the Provincial policy framework and once the City completes its Official Plan Review, the amendments will be sent to the

Province for approval.

- Q.** Does the City have enough employment land to meet the target number of jobs required to balance employment and residential growth?
- A.** According the MGP consultant report, there is enough land in employment areas to accommodate employment growth within until 2031. Somewhere between 2031 and 2041 the City runs out of land for employment growth in its employment areas. In the long-term preservation of land for employment uses in employment areas is needed, because once lands in employment areas are converted to other uses, they almost never revert back to employment uses.

Feedback from Small Group Discussions

9. What are the strengths of the draft policy changes regarding Toronto's Employment Lands?

Afternoon Session:

- Multiple employment designations are a strong start, and provide a clear direction for future of City's employment lands.
- Particularly like the policies that protect industrial employment areas, and those that require the replacement of existing employment uses in new developments near rapid transit.

Evening Session:

- The draft policies are great in terms of protecting employment lands.

10. What issues or concerns (if any) do you have with the draft policies?

- Need to define sensitive uses, and how they impact industrial activities. There is a problem of non-residential sensitive uses being permitted in employment areas.
- Need to clarify which employment uses require protection and should be located in 'Core' employment areas.
- Concern about the policy that requires below grade or structured parking for large-scale, stand-alone retail in the suburbs. Anticipate that it will be difficult to attract retailers who generally prefer cheaper surface parking.
- Competition between 416 and 905 municipalities for business - need to coordinate regional business employment policies.
- Concern that if only 80 percent of current employment lands are designated as 'Core', then 20 percent will be converted to non-employment uses incrementally, first for retail then for residential in separate steps. Need for more protective measures.

11. What policy changes would you suggest?

- Policies should include incentives, and reduce barriers (e.g. landscaping requirements) in an effort to promote the development of desirable employment activities.
- May be beneficial to limit offices uses in

<p>core employment areas,</p> <ul style="list-style-type: none"> • Need Tax rates that are uniform across the City, don't provide tax relief in some employment areas and not in others. • Need to ensure there is coordination with other policy areas (e.g. transit and parking). 	
12. Other	
<ul style="list-style-type: none"> • Concerned about the relationship between the Official Plan Review and the new harmonized zoning by-law. 	<ul style="list-style-type: none"> • Concerned about the Avenue overlay on Sheppard Avenue East, and the precedent set by the approval of two condominiums at the edge of the Consumers Road business park.

City of Toronto Official Plan Review – Draft Employment Lands Policies Public Open House #4

*City Hall, Council Chambers
Wednesday, February 27, 2013
6:30 p.m. to 9:00 p.m.*

Public Meeting Summary

Four Public Open House meetings were organized by City Planning to inform participants of the proposed changes to the Official Plan's employment uses policies and seek feedback. The meetings encouraged broad public participation in the development of the City's employment lands policies, and included several opportunities for participants to provide comments and feedback. The following provides a summary of the feedback collected from Public Open House #4.

Attendance	45
Presentation	Jeffrey Cantos

Questions and Answers

- Q. It was mentioned during the presentation that parking lots can be replaced by residential buildings. Doesn't it make more sense to encourage the development of mixed-use buildings?**
- A. Most of the buildings that are being developed are a mix of residential and retail uses. The intent of the policy being proposed is to ensure the replacement of existing employment uses on a site being redeveloped so office space is not lost.**
- Q. Is there an intention to create new employment districts in the downtown core to protect office buildings from residential and hotel encroachment?**
- A. Not necessarily, the City is experiencing an unprecedented growth in office development in the south financial district.**
- Q. Do the policies specify that new retail establishments in employment areas should be a minimum of two stories with structured parking guidelines; will they be mandatory?**
- A. The policy requirement applies to large-scale retail development, 60,000 sq. ft. or larger.**
- Q. Shouldn't the City be retaining its employment lands instead of converting them to residential uses to ensure balanced population and employment growth?**
- A. The City is on track to meet growth targets for employment set by the Province. It is also well ahead of the curve to meet population growth targets. Our analysis indicates there is no need to convert employment lands to meet the housing needs of the City's growing population. The policy to replace existing employment uses also ensures the retention of office space outside designated employment areas.**
- Q. If employment lands have been designated for certain purposes, why is the City entertaining the possibility of other uses through conversion requests? Shouldn't**

they be left as employment areas, especially if they have been contaminated by industrial activities in the past?

- A. The Province gave municipalities the authority to make decisions about land use. Municipalities are required to review their land use policies, including those related to employment lands, every five years during an Official Plan Review. Landowners also have the right to request a land use conversion for their properties. The current Official Plan Review / Municipal Comprehensive Review provides landowners with the opportunity to apply for a conversion request, and appeal the decision if they are unsatisfied with it. City Planning is proposing to retain 98 percent of the City's employment lands.

- Q. Can you explain the proposed 'Retail' employment area designation in more detail, especially how it relates to big-box retail formats?

- A. Large format big-box developments are permitted only on major roads in the current Official Plan. The draft employment uses policies would permit them in 20 percent of the City's employment lands, within the 'General' and 'Retail' employment areas. We have received feedback questioning the functional impact of retail developments in the 'General' and 'Core' employment areas. What's the difference between five medium-scale stores, and one large-scale one? We'd like to hear from participants whether the two designations we are considering should be merged into one designation.

- Q. Are there incentives to encourage the development of retail at different scales in the retail employment areas – I assume that retail will be dominated by Big-Box?

- A. There are different forms and scales of retail uses throughout the City's employment areas that range from plazas to big-box developments. There are plazas at the edge of employment areas in the former suburbs that serve ethnic markets.

- Q. How is City Planning going to ensure a balance between residential development and office development near transit stations outside the downtown core, in the Yonge and Eglinton Centre for example?

- A. You are right that residential growth is outpacing office development at Yonge and Eglinton. Office development is stagnant in some of the City's centres. We do need to protect existing offices, and ensure they are replaced in new developments so that they do not disappear. We understand the need for balance. This is important for two way traffic and congestion issues.

- Q. How do the draft employment use policies address mixed-use development?

- A. The focus of the draft policies is employment lands and employment activities. We encourage mixed-use development where possible, and appropriate. Implementing mixed-use development is difficult. There is resistance to it because it necessitates a different model for financing, leasing, and selling properties. The Malone Given Parsons report provides additional background if you are interested.

- Q. In terms of mixed-use development, to what extent is scale taken into consideration? Are start-up, small-scale employment activities tolerated in non-employment areas?

- A. The draft employment use policies welcome all scales of employment activities. In non-employment areas, it depends whether the activity is compatible with residential uses. Anyone can start up a firm in their house as long as it is compatible with residential uses (e.g. heavy industry would not be permitted).

- Q. The City's motto 'Diversity our Strength' was referenced during the presentation, but there did not appear to be any analysis that reflects an equity perspective of employment (e.g. gender and race) – why is this?**
- A. The purpose of this project is to preserve jobs, and promote opportunities for future jobs. We didn't look at race or gender in our analysis. It was beyond the scope of the project. City Planning does not have the resources to perform that level of analysis on the gender or ethnic or racial composition of the workers in each workplace.**
- Q. Do you expect the Province to support the draft employment use policies, or is there a chance that the Province will appeal them to the Ontario Municipal Board (OMB)?**
- A. The Province does not go to the OMB. The role of the Province is to review the Official Plan when Council approves the amendments and makes decisions regarding the policies and designations. The Minister of the Ministry of Municipal Affairs and Housing can approve or require modifications to the Official Plan. The version of the Official Plan approved by the Province can also be appealed to the OMB by other parties after the Provincial decision. City Planning is working closely with the Province, who is very much in step with the direction we are going in. The Province may have some comments.**
- Q. What is the hope of maintaining office developments in employment areas adjacent to low density residential neighborhoods? How are you balancing the needs of business owners who may prefer to locate in proximity to a larger talent pool?**
- A. The employment areas you are referring to are doing well. There are very few vacancies in the City, our employment lands have the lowest vacancy rate across the GTA. Employment has been stable, and has benefitted from tremendous investment. There is not much high-density office development outside the downtown core, but we are seeing low rise office development. The intent of the policies is to ensure employment areas are spread out across the City, and not concentrated in one area.**
- Q. What is your take home message for this evening: a) the City needs to preserve its existing supply of employment lands; b) the City needs to expand its supply of employment lands in the interest of increasing jobs; or c) the City needs to expand its supply of employment lands with an eye toward equity and the diverse needs of its population?**
- A. The takeaway message is that the City needs to grow jobs on a limited supply of employment lands. We need to preserve the City's employment areas, and intensify development on them. We are encouraging more efficient use of the existing land base through the new policies; structured parking is an example. Manufacturing jobs are not keeping pace with investment due to increased mechanization; productivity is increasing but jobs are not. The highest density jobs are always in office.**
- Q. Why does City Planning permit the conversion of existing places of worship in non-employment areas to residential uses, so that new places of worship are forced to locate in employment areas?**
- A. We have heard similar comments from the industrial employers located in the City, and are aware of the issue. The Ministry of the Environment considers places of worship as a sensitive use.**

- Q. Why is City Planning not exploring opportunities to expand the supply of employment lands?**
- A. It's the nature of land economics. We can't go out and buy a neighbourhood, and replace it with an office development. We're dealing with what we have.**

Feedback

13. What are the strengths of the draft policy changes regarding Toronto's Employment Lands?

- Policies to stimulate office development and employment along transit nodes.
- Intent to retain 98 percent of employment areas given pressure of conversion requests.

14. What issues or concerns (if any) do you have with the draft policies?

- Need for more protection of the existing employment district in the downtown core.
- Concern that big-box establishments will dominate retail employment areas.
- Concern that draft policies are defensive and do not explore creative ways to expand the City's supply of employment lands.
- Need to clarify and be more explicit about the type of employment activities that are permitted in 'Core' areas.

15. What policy changes would you suggest?

- Recommend integrating an equity perspective into planning analysis.
- Recommend maintaining 'Retail' and 'General' employment areas as separate designations to prevent the proliferation of big-box developments.
- Need for more policies to support transit-oriented office development.

16. Other

- Concern that there is a disconnect with the employment statistics presented by City Planning and what is reported in other studies.
- Concern that data has not been disaggregated to examine employment trends in terms of gender, race or income levels.
- Places of worship often establish themselves in employment areas because discrimination prevents them from locating in non-employment areas.
- Zoning requirements for big-box retail establishments privilege automobile users over pedestrians.
- Public transit should be affordable to build, maintain, operate and use.

**Attachment 2: Letter from Ministry of Municipal Affairs and Housing,
March 27, 2013**

**Ministry of
Municipal Affairs
and Housing**
Municipal Services Office
Central Ontario
777 Bay Street, 2nd Floor
Toronto ON M5G 2E5
Phone: 416 585-6226
Fax: 416 585-6882
Toll-Free: 1 800 668-0230

**Ministère des
Affaires municipales
et du Logement**
Bureau des services aux municipalités
du Centre de l'Ontario
777, rue Bay, 2^e étage
Toronto ON M5G 2E5
Téléphone : 416 585-6226
Télécopieur : 416 585-6882
Sans frais : 1 800-668-0230



March 27, 2013

Ms. Kerri Voumvakis
Director
Strategic Initiatives, Policy & Analysis
City of Toronto
Metro Hall
55 John Street, 22nd Floor
Toronto ON M5V 3C6

Dear Ms. Voumvakis,

**RE: Toronto Official Plan Five-Year Review
Draft Policies and Designations for Employment
MMAH File No. 20-DP-2002-11010**

The Ministry of Municipal Affairs and Housing ("MMAH") staff have had the opportunity to review the draft employment policies and designations that have been prepared as part of the City's Five-Year Review of the Official Plan.

We would like to take this opportunity to acknowledge and commend the City's efforts in drafting policies which provide for a mix of employment uses, protect employment area lands and ensure that such lands are available for current and future economic opportunities and development. The Province recognizes the importance of and has an interest in the long-term protection of employment areas and supports the City in implementing policies of the Growth Plan for the Greater Golden Horseshoe, 2006 ("Growth Plan") and Provincial Policy Statement, 2005 ("PPS") as part of the current Official Plan review.

The draft employment policies reflect a progressive and integrated approach of preserving designated employment areas. The proposed policies set out a framework to protect the finite employment resource and land base for Toronto, while supporting new office growth and development, expanding growth in the institutional and cultural sectors, supporting economic diversity, and building complete, sustainable and transit-supportive communities.

Through the One-Window Provincial Planning Service the draft employment policies were circulated to the Ministries of Infrastructure (MOI), Tourism, Culture and Sport (MTCS), Environment (MOE) and Transportation (MTO). Based on our review, we offer the following pre-consultation comments for the City's consideration:

1) Institutional Uses in Urban Growth Centres

As indicated in the City Staff Report dated October 23, 2012, the institutional sector in Toronto experienced more growth than any other sectors between 2001 and 2011, adding 43,000 jobs (page 23) and the City anticipates greater demand for universities, colleges and hospitals to serve its growing and ageing population. This growth is supported in the draft amendments to the Official Plan through encouraging the expansion of health and educational institutions (Draft Policy 3.5.1.2) as well as retaining current institutional uses for future expansion (Draft Policy 3.5.1.9).

We recommend that the City consider adding a policy in Section 3.5.1 which clearly supports the establishment of appropriate major institutional development to be located in Urban Growth Centres and other areas with existing or planned higher order transit service (Growth Plan Policy 2.2.6.4)

From our reading of the policies, there doesn't appear to be any policy to address the preferred location of major institutional development.

2) Redesignation Between Employment Areas

The draft employment land use designations propose that Employment Areas be comprised of three Employment Area designations: Core Employment Areas, General Employment Areas, and Retail Employment Areas. Lands within the 'Core Employment Areas' are intended to be reserved for industrial activities that cannot be located in other areas of the City. Permitted uses on lands within the 'General Employment Areas' and 'Retail Employment Areas' are generally broader, allowing for additional secondary uses to be established without disturbing the planned and existing function of the Core Employment Areas. While the draft policies include a conversion policy to protect lands in Core Employment Areas, General Employment Areas and Retail Employment Areas from conversion to non-employment uses only through a Municipal Comprehensive Review, there doesn't appear to be a policy to address redesignation between the three Employment Area designations. The lack of such a policy may threaten the supply of Core Employment Area lands which represent approximately 80% of the total lands proposed to be designated as Employment Areas and which are preserved for traditional industrial uses.

We recommend the City consider adding a policy to Section 4.6 or providing a definition for "conversion" to address limiting redesignations between the three Employment Areas outside of a five-year Official Plan review or Municipal Comprehensive Review.

3) Limit Appeal Rights on Employment Conversions

Certain changes to the *Planning Act* were introduced under Bill 51, the *Planning and Conservation Land Statute Law Amendment Act, 2006*, including enhanced ability for municipalities to protect employment lands by removing an applicant's right of appeal to the Ontario Municipal Board (OMB) when council refuses or fails to adopt an official plan amendment or pass a zoning by-law amendment that proposes to remove any land from an area of employment, even if other land is proposed to be added. This provision will help municipalities to protect employment lands from being converted to other uses when such conversions are not supported by Council.

This provision operates to prevent appeals only if the municipality has official plan policies in place dealing with employment land conversions (subsection 22(7.3) of the *Planning Act* for an official plan amendment and subsection 34(11.0.5) of the *Planning Act* for a zoning by-law amendment). The draft conversion policies within this amendment should be precise enough in order for the City to benefit from these provisions in the *Planning Act* (see below re: policy specific comments).

With respect to the draft "General Employment Areas" and "Retail Employment Areas" designation, it should be noted that the *Planning Act* provision limiting appeal rights only applies to lands that meet the *Act's* definition of "area of employment." Given the range of permitted uses within the draft "General Employment Areas" and "Retail Employment Areas," it is unclear whether this designation meets the *Planning Act* definition, and as such, the City may not be able to rely on the *Planning Act* provisions which limit the above mentioned appeal rights.

4) Sensitive Land Uses in Employment Areas

The Ministry understands that the current Official Plan provides for places of worship in all land use designations except for Parks, Utility Corridors and portions of Employment Areas not on a major road. We further understand that as a result there has been considerable growth in the establishment of places of worship since 2002 in employment areas. The draft Section 4.6 policies propose limiting new places of worship to the General Employment Area and Retail Employment Area designations subject to specific criteria. They are proposed to be prohibited in Core Employment Areas. Recreation uses are also proposed to be permitted in the General Employment Areas and Retail Employment Areas, but not in Core Employment Areas.

The provincial guidelines dealing with land use compatibility between industrial and sensitive land uses provide potential influence areas within which adverse effects may be experienced for different classes of industrial facilities. Potential influence areas for Class I, II and III industrial facilities are outlined in the MOE D-6 Guideline range from a 70 metres zone of influence for a Class I facility to 1,000 metres for a Class III facility. Mitigation at the industrial source may be able to reduce these areas of influence; such mitigation generally places the onus on the existing and future industrial uses to apply reduced zones of influence. This has a consequential economic impact and may be a disincentive to the retention of industrial land uses in the Employment Areas.

Permitted uses in proposed Core Employment Areas include manufacturing, warehousing, distribution of goods, and utilities. These uses may result in adverse effects such as noise and vibration, odours and other air emissions, litter, dust and other particulates, or other contaminants. As per provincial guidelines, incompatible land uses are to be protected from each other and (generally) distance is the only effective buffer, therefore requiring adequate separation distance as the preferred method of mitigation. The overall intention of the policy framework is to ensure that adjacent sensitive land uses do not hinder the employment uses. To this end, employment uses permitted in the General and Retail Employment Areas beyond the uses permitted in Core Employment Areas should not adversely impact the planned and existing function of Employment Areas where the heavy industrial uses exist and where new industries will locate.

Allowing sensitive land uses within designated Employment Areas in the Official Plan has the potential to compromise the suitability of surrounding land for employment uses that require separation and impact this limited land supply.

Local community institutions and public facilities such as places of worship, recreational uses, and post-secondary colleges and universities should continue to be directed to land use designations where the population resides such as the Neighbourhoods, Apartment Neighbourhoods, Mixed Use Areas and Regeneration Areas designations.

We recommend that the City modify the existing policy to address the permissions for places of worship, recreational and entertainment uses, and post-secondary colleges and universities in all three Employment Area designations to ensure that there are no adverse effects on the principle uses intended for the Employment Areas. The City needs to carefully consider the uses permitted addressing the conflict or potential conflict of these sensitive uses within Employment Areas. We believe that a best practice in this regard is the outright prohibition of new development with these sensitive uses in Employment Areas. Alternatively, clearer direction related to the assessment of such development may be required as the current criteria "without disturbing the planned and existing function of the *Core Employment Areas*" may be too vague and does not adequately provide for the protection of the Employment Areas.

5) Employment Conversion Preliminary Assessment

The Growth Plan states that municipalities may permit the conversion of lands within employment areas to non-employment uses only through a Municipal Comprehensive Review where certain criteria are met.

We understand that the City has received over 100 requests and/or applications to convert employment lands to non-employment uses, mostly for residential uses. The City is reviewing all conversion/application requests by applying Growth Plan and PPS criteria and has undertaken a preliminary assessment for consultation on 65 of the conversion requests as outlined in the October 23, 2012 draft policy report.

The Ministry understands the conversion requests/applications assessment and municipal comprehensive review will continue until the statutory public meeting is held and City staff will be reporting on the remaining requests to Committee and Council.

We recommend that the City's assessment of all employment conversion requests/applications be measured against the criteria set out in the Growth Plan, as well as ensuring proper land-use compatibility and review against provincial policies and legislation such as the Ministry of the Environment's D-Series Guidelines and Ontario Regulation 153/04 (Records of Site Condition) under Part XV.1 of the *Environmental Protection Act*.

6) Heritage Protection

It is suggested that a policy be included which states that the Heritage Conservation policies in the Official Plan shall apply to proposals for development or re-development within older established employment areas, including industrial, institutional, commercial or retail uses, to encourage:

The retention, renewal and conservation of industrial buildings of cultural heritage value or interest, and

The retention and renewal and conservation of institutional built resources such as schools, churches, hospitals, courthouses and other buildings of cultural heritage value or interest.

7) Retail / Mixed Uses and Employment Areas

Ministry staff would like to discuss the potential use of mixed use and retail designations, in areas of retail use only, and the considerations this may entail. We do not have formal concerns rather we'd like to discuss potential options and share provincial experience from other jurisdictions.

8) Specific Policy Comments and Technical Edits

The following are specific comments and suggested changes on the draft Chapter 2, 3 and 4 policies:

a) Chapter 2 Draft Policies

Section 2.2.4.3 b) – add the words, "to support current and future needs" after the words, "Investing in key infrastructure ..." so that the policy now reads:

Investing in key infrastructure **to support current and future needs**, or facilitating investment through special tools, incentives, and other programs or partnerships...
[Rationale: Growth Plan Policy 2.2.6.2 d)]

Section 2.2.4.3 b) – this policy focuses on investments to facilitate the development of vacant lands, adaptive reuse of vacant buildings and addressing poor environmental conditions. The ministry suggests the City consider adding brownfields redevelopment and the following is suggested wording:

Facilitate the remediation of brownfield sites to enable employment use redevelopment
[Rationale: PPS Policy 1.1.3.3]

Section 2.2.4.4 – the current draft policy addresses development of new residential and other sensitive land uses adjacent or near Employment Areas in order to protect industrial uses from sensitive land uses. It is recommended that City staff also consider adding a policy or expanding this section to include protection for sensitive land uses located outside of Employment Area designations (i.e. within the Neighbourhoods, Mixed Use Areas, Institutional Areas, etc.) from potential adverse impacts of heavy industrial uses within lands designated as Employment Areas.

This policy section should also be enhanced to include additional direction or criteria such as:

Reference to having regard for provincial guidelines concerning compatibility between industrial facilities and sensitive land uses (i.e. MOE's D-Series Guidelines on Land Use Compatibility);

Proponents of a sensitive land use outside an Employment Area designation or a new industrial facility within an Employment Area designation should be responsible for addressing and implementing the necessary mitigation measures

to the satisfaction of the City;

Approaches to mitigation such as establishment of separation distances and/or appropriate transitional use and approaches such as screening, barriers, landscaping, traffic and lighting mitigation, technological mitigation, etc.

Section 2.2.4.6 b) – add the words, “and minimizes surface parking” at the end so that the policy now reads:

Encouraging new employment development to take place in a form and density that supports transit **and minimizes surface parking**. [Rationale: Growth Plan Policy 2.2.6.10]

b) Chapter 3 Draft Policies

Section 3.5.1.5 – add the words, “to support current and future employment needs” after the words, “maintained, improved and extended” so that the policy now reads:

Investment on the part of public agencies or through partnerships agreements will ensure that infrastructure will be maintained improved and extended **to support current and future employment needs** in the following areas...
[Rationale: Growth Plan Policy 2.2.6.2 d)]

c) Chapter 4 Draft Policies

Core Employment Areas

Section 4.6.3 – the policy as written may be unnecessarily vague and should make reference to the Growth Plan. A suggestion to reword the policy is as follows:

Lands in Core Employment Areas may only be converted from Employment Areas to non-employment uses including, but not limited to residential and institutional residential uses, and/or a large-scale stand-alone retail store or a power centre as defined in policy 14 of this section, through a *Municipal Comprehensive Review* where it has been demonstrated that the conversion criteria set out in section 2.2.6 of the Growth Plan for the Greater Golden Horseshoe have been met.

The above comment also applies to Sections 4.6.5 (General Employment Areas) and 4.6.7 (Retail Employment Areas) for conversion.

A new policy in the Core Employment Areas section should be added to reflect Growth Plan Policy 2.2.6.9 to ensure that lands within the vicinity of major infrastructure are designated and protected for employment uses. Suggested wording is as follows:

Lands in Core Employment Areas in the vicinity of existing major infrastructure such as highway interchanges, ports, rail yards and airports are designated and preserved for employment uses that rely on this associated infrastructure.

Major Office

The Core Employment Areas' policy 4.6.1 presently permits "offices." The Growth Plan, policy 2.2.4, directs major office (offices greater than 10,000 square meters or more than 500 jobs) to "Urban Growth Centres, major transit station areas, or areas with existing frequent transit service, or existing or planned higher order transit service". Policy 3.5.1.6 directs "new office development" to those areas. In either case the draft policies do not distinguish major office from smaller office developments. In order to ensure that the Growth Plan direction is followed wherein employees of large offices are appropriately serviced by public transit and other commercial and recreational services, we suggest that policy 4.6.1 adopt language similar to that of the Growth Plan policy 2.2.4, directing major office development away from Core Employment Areas that are not appropriately serviced. This policy direction supports the City's desire for a strong economy, efficient use of infrastructure, and desired densities in these important intensification areas.

9) Definitions

Major Office – recommend including definition as per the Growth Plan:

"Major office is generally defined as freestanding office buildings of 10,000m² or greater, or with 500 jobs or more."

Conversion – suggest the City to include a definition for "conversion" since it is used in the draft employment conversion policies. Suggested wording is as follows:

"Conversion: means a redesignation from an Employment Area designation to another designation or to another sub-Employment Area designation, or the introduction of a use that is otherwise not permitted in the Employment Area designations."

Sensitive land uses - recommend including definition as per the Provincial Policy Statement (2005):

"Sensitive land uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience on or more adverse effects 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."

Municipal Comprehensive Review – in order to support the conversion policy in Section 4, recommend providing the Growth Plan definition:

"An official plan review, or an official plan amendment that comprehensively applies the policies and schedules of the Growth Plan for the Greater Golden Horseshoe."

10) Mapping of Draft Employment Designations

Lands that are located within highway ramp areas of a Provincial Highway should not be designated as Employment Areas. For example, the lands designated as 'Core Employment Area' on Map 10, within the ramp area of Highway 427 and Highway 409 should be white in accordance with how the official plan identifies the highway corridors.

11) Development Permit System

Finally, in the City's current Official Plan, we note that Section 5.2.3 provides the opportunity for the City to utilize the Development Permit System (DPS). Municipalities are encouraged to use this planning tool which introduces a new flexible land use approval framework that facilitates and streamlines the development process. The DPS provides a 'one-stop' planning service by combining zoning, site plan and minor variance approval and can assist municipalities in attaining land use priorities such as energy conservation and green infrastructure, brownfields redevelopment, efficient use of land through compact development, redevelopment and intensification, and transit and pedestrian-oriented development. The streamlined process may also draw potential employers and developers into existing employment areas and facilitate community enhancement and economic development.

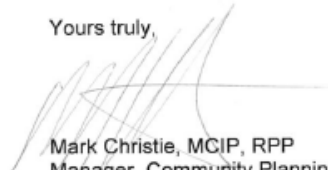
We continue to support the use of a DPS in the City. As such, we encourage the City to have further discussions with Ministry staff regarding opportunities in implementing the DPS for use as a pilot for one or two areas, or more generally in the context of the Employment Areas of the City.

In closing,

Thank you for providing us with the opportunity to review and comment on the proposed employment policies as part of the City of Toronto's Five-Year Review of the Official Plan. We look forward to continuing to work with City staff in proceeding with the proposed Official Plan employment policies/amendment.

By this letter, Ministry staff would also appreciate receiving notification on future updates on this amendment and consultation opportunities. Should you have any further questions, please contact Karen Ho, Planner at 416-585-6862, Louis Bitonti, Senior Planner at 416-585-6563 or the undersigned at 416-585-6063.

Yours truly,



Mark Christie, MCIP, RPP
Manager, Community Planning and Development
Municipal Services Office- Central

cc. Larry Clay, Director, Municipal Services Office - Central
Paul Bain, Project Manager, OP Review, Toronto