



**PG21.1.253**

Submission by  
Andrew Judge,

## The Toronto Industry Network

March 6, 2013

### **SUBMISSION TO THE PLANNING AND GROWTH MANAGEMENT COMMITTEE – PG21.1 – City-wide Zoning By-law**

Good Morning. My name is Andrew Judge and I am president of the Toronto Industry Network (TIN). With me is Paul Johnston of Litavski Johnston who is our municipal planner. TIN appreciates the opportunity to appear before the Planning and Growth Management Committee regarding the City-wide Zoning By-law.

Our position is straightforward. We support the recommendations contained in the staff report of January 26, 2013. However, there are some matters detailed in our letter to you that we would very much like to resolve with staff before the April Council meeting. For our members, compliance with local regulations however minor is imperative as it affects things like corporate governance and financing. We do not wish to face compliance issues in the future so we would be pleased to meet with staff to seek accommodation on these items.

It is important for you to remember that Toronto's manufacturing community is a real wealth generator that employs 120,000 people, a majority of whom live in our City. We need certainty and clarity regarding City legislation affecting us such as this By-law. Further, this By-law should be viewed in the context of the ongoing Official Plan review that seeks to strengthen employment areas as an essential part of our City's economic development strategy. Manufacturers by their nature are limited to operating on employment lands and we believe the City should continue to do everything in its power to encourage existing industry to re-invest and to entice new industry to locate in Toronto by protecting employment lands.

There are several matters we wish to highlight for you:

#### **Places of Worship**

We sympathize with needs of the Places of Worship to find good accommodations for the congregations and we believe the City has heard this message. We are supportive of the By-law proposal to allow Places of Worship as of right in EO zones and only on major streets. Existing Places of Worship would be granted legal non-conforming status.

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However, Places of Worship and other sensitive uses such as schools, residences, sports facilities, etc. can cause manufacturers a lot of grief. People who are not part of the manufacturing community often do not have much sympathy for what we do and what is required to make our facilities function properly. No one remembers that industry was there first. Sensitive uses such as the ones listed above are often in conflict with our plans when we apply for provincial approval from the Ministry of Environment (Certificates of Approval) for changes to our operations.

It is noted that Places of Worship and other sensitive uses have generally located in industrial areas because of lower costs. We also point out that these sensitive uses have much more latitude in where they can locate in the City.

To effectively compete in world markets, manufacturers need to know they can adapt their operations in a timely fashion to meet the needs of their customers and to upgrade their facilities. Local regulations and conditions play a big role in this. If this cannot happen, they will not invest in our City.

**Clarification regarding What Manufacturing Uses are permitted (Sections 60.10.20.10 & .20, 60.20.20.10 & .20, 60.30.20.10 & .20)**

While the proposed By-law allows a broad range of manufacturing uses to occur in E and EH zones, it provides for some very specific uses such as Apparel and Textile Manufacturing, Food Manufacturing, Metal Products Manufacturing, etc. in EL and EO zones.

The convention in municipal law states that if a use is listed as permitted in one zone but not listed in another, then it cannot be inferred to be permitted in the zone where it is not listed. Therefore, by listing very specific uses in EL and EO zones, these uses are not allowed in E and EH zones. We see this provision as a future problem for manufacturing.

Staff must be commended for developing a By-law that addresses many of the needs of the manufacturing community. TIN looks forward to working with staff to resolve outstanding issues.

We would be happy to answer any questions you might have.

A handwritten signature in black ink, consisting of a large, stylized initial 'T' followed by several loops and a long horizontal stroke.