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March 7, 2013

BY REGULAR MAIL

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

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

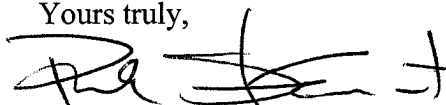
**Re: Official Plan Review
Planning for a Strong & Diverse Economy: Employment Areas Policies
City of Toronto**

Recently I had the pleasure of attending the City's Public Open House per the City Official Plan Review regarding Employment Areas policies.

In that regard please refer to attached Table 1: Comparison of Existing & Proposed Official Plan Employment Policies with our Comments & Recommendations for the City's consideration.

We kindly request that we be placed on the City's public notification list regarding the above captioned item. If you have any questions or comments, please advise.

Yours truly,



Philip J. Stewart, MCIP, RPP

/la

1704ltr.Mar.07.2013

cc. Ms. U. Watkiss, City Clerk, City of Toronto
cc. Ms. K. Voumvakis, City of Toronto
cc. Mr. P. Bain, MCIP, RPP, City of Toronto

(Attachment: Table 1: Comparison of Existing & Proposed City of Toronto Official Plan Employment Policies with PSP Comments & Recommendations

Handwritten: Jennifer Keesmaat
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CITY CLERK

POUND & STEWART ASSOCIATES LIMITED

205 BELSIZE DRIVE, SUITE 101, TORONTO, ONTARIO, CANADA M4S 1M3 • 416 482 9797
305 RENFREW DRIVE, SUITE 101, MARKHAM, ONTARIO, CANADA L3R 9S7 • 905 305 9797
1 800 250 9056 • WWW.CITYPLAN.COM • INFO@CITYPLAN.COM

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TABLE 1: COMPARISON OF EXISTING & PROPOSED CITY OF TORONTO OFFICIAL PLAN EMPLOYMENT POLICIES WITH PSP COMMENTS & RECOMMENDATIONS

Existing Official Plan Employment Policies	Proposed Official Plan Employment Policies	PSP Comments & Recommendations
<p>1. <i>Employment Districts</i> shown on Map 2 will be protected and promoted exclusively for economic activity in order to:</p> <ol style="list-style-type: none"> maintain and grow the City's tax base; attract new and expand existing employment clusters that are key to Toronto's competitive advantage; develop quality <i>Employment Districts</i> that are globally competitive locations for national and international business and offer a wide choice of sites for new business; nurture Toronto's diverse economic base; provide a good overall balance between population and employment growth by creating job opportunities for Toronto residents; provide a range of employment opportunities for Toronto residents that can be reached by means other than the private automobile; and create and sustain well-paid, stable, safe and fulfilling employment opportunities for all Torontonians. <p>2. <i>Employment Districts</i> will be enhanced to ensure they are attractive and function well, through actions such as:</p> <ol style="list-style-type: none"> 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; investing in key infrastructure, or facilitating investment through special tools, programs or partnerships, in order to: <ol style="list-style-type: none"> revitalize <i>Employment Districts</i> which may be experiencing decline because of vacancies and closures, absence of key physical infrastructure, poor accessibility, or poor environmental conditions; promote the distinctive character or specialized function of a <i>District</i> to attract firms within a particular targeted cluster of economic activity; facilitate the development of vacant lands; and create comfortable streets, parks and open spaces for workers and landscaped streetscapes to attract new business ventures; and encouraging and supporting business associations that promote and provide a business voice for the <i>District</i>. <p>3. Transit use will be encouraged in <i>Employment Districts</i> through investing in improved levels of service, by encouraging new economic development to take place in a form and density that supports transit and by encouraging travel demand management measures.</p>	<p>CHAPTER 2 POLICIES (Delete Section 2.2.4 and replace it with the following :)</p> <p>2.2.4 Employment Areas: Supporting Business and Employment Growth</p> <p>1. Employment Areas, shown on Maps 2, and 13 to 23 inclusive, will be used exclusively for economic activities in order to:</p> <ol style="list-style-type: none"> Retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing, warehousing, utilities and transportation; 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; Maintain and grow the City's tax base; Offer prominent, accessible and, where possible, visible locations and a wide choice of appropriate sites for potential new businesses; Continue to contribute to Toronto's diverse economic base and maintain the base of export-oriented wealth creating employment; Contribute to a balance between jobs and housing to reduce the need for long-distance commuting and encourage travel by transit, walking and cycling; Reinforce the live-work relationship between Employment Areas and nearby residential neighbourhoods; and Contribute to a broad range of stable full-time employment opportunities. <p>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 uses and other service functions compatible with the function of Employment Areas will be directed to lands along the boundaries of Employment Areas.</p> <p>3. Employment Areas will be enhanced to ensure they are attractive and function well, through actions such as:</p> <ol style="list-style-type: none"> 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; Investing in key infrastructure, or facilitating investment through special tools, incentives, and other programs or partnerships, in order to: <ol style="list-style-type: none"> Promote the distinctive character or specialized function of an area to attract businesses within a particular targeted cluster of economic activity; 	<p>The timeline 'current and future needs' is supported because it allows for a broad time range to support planning justification for a development or redevelopment project, and not just long term.</p> <p>We recommend modifications to the following policies:</p> <p>1. <i>a) Retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing, warehousing, distribution, utilities and transportation;</i></p> <p>1. <i>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;</i></p> <p>1. <i>c) Maintain and grow the City's business and realty tax base;</i></p> <p>1. <i>e) Continue to contribute to Toronto's diverse economic base and maintain the base of support export-oriented wealth creating employment;</i></p> <p>1. <i>f) Should be added to read:</i></p> <p>Protect and preserve employment areas for current and future uses and ensure that the necessary infrastructure is provided to support current and future uses.</p> <p>A list of sensitive land uses to be applied to Employment Areas is required.</p> <p>Should there not be reference to the role of 'institutional Uses' in Employment Areas in 2.2</p> <p>We recommend modifications to the following policy:</p> <p>3. <i>c. Ensure Address-the-absence-of key physical infrastructure is in place and allow the adaptive reuse of physical infrastructure to improve environmental conditions or achieve universal accessibility.</i></p> <p>General Recommendation:</p>

TABLE 1: COMPARISON OF EXISTING & PROPOSED CITY OF TORONTO OFFICIAL PLAN EMPLOYMENT POLICIES WITH PSP COMMENTS & RECOMMENDATIONS

<p>4. Measures will be introduced and standards applied on roads within Employment Districts that give priority to the movement of transit vehicles and trucks.</p> <p>5. Walking and cycling will be encouraged by creating safer and more attractive conditions in Employment Districts.</p> <p>6. Development adjacent to or nearby Employment Districts will be appropriately designed, buffered and/or separated from industries as necessary to mitigate adverse effects from noise, vibration, traffic, odour and other contaminants, and to promote safety and security.</p>	<p>b. Facilitate the development of vacant lands and the adaptive reuse of vacant buildings for employment purposes; and</p> <p>c. Address the absence of key physical infrastructure, poor environmental conditions or poor accessibility.</p> <p>c) Encouraging and supporting business associations that promote and provide a voice for businesses within Employment Areas;</p> <p>d) Establishing a connected network of public streets for use by trucks, automobiles, transit and pedestrians; and</p> <p>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.</p> <p>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.</p> <p>5. Measures will be introduced and standards applied on roads within Employment Areas that give priority to the movement of trucks and transit vehicles.</p> <p>6. Transit use will be encouraged in Employment Areas by:</p> <p>a) Investing in improved levels of service to Employment Areas, particularly from nearby residential areas and Mixed Area Uses;</p> <p>b) Encouraging new employment development to take place in a form and density that supports transit;</p> <p>c) Creating safe and comfortable pedestrian conditions between places of work and transit stops; and</p> <p>d) Encouraging travel demand management measures.</p>	<p>Phasing is not referenced in any of the proposed policies to support business investment and timing. Introducing a policy acknowledging that the Urban Form envisioned by the Plan will take time to realize and therefore development may be phased in a manner that ultimately contributes to the achievement of the City's policies and economic sustainability. It would be necessary for a proponent to demonstrate the importance of phasing in supporting business operations and future development.</p> <p>This policy needs to be re-written to ensure that the responsibility of mitigation resides entirely with the new residential and other sensitive land use proponents. There should be a warning clause registered on title (similar to airport noise warnings) to advise residents and sensitive use operators in order to protect the operational integrity of industrial businesses, now and in the future.</p> <p>Proposed Policy 6, b) is cumbersome to industry where form and density will not necessarily support transit use because of business functionality and operational requirements. Therefore an issue will arise based on the City's level of enforcement of this policy.</p>
<p>1. Economic opportunities will grow with the success of this Plan's strategy to manage growth and change in ways that:</p> <p>a) guide development to parts of the City where it will be most suitable;</p> <p>b) facilitate this development through clear, easily understood rules;</p> <p>c) encourage high quality architecture and urban design in new development; and</p> <p>d) ensure high quality urban infrastructure to support growth.</p>	<p>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:</p> <p>a) Maintaining a strong and diverse economic base;</p> <p>b) Contributing to a broad range of stable full-time employment opportunities for all Torontonians;</p> <p>c) Maintaining a healthy tax base for the City;</p> <p>d) Promoting export-oriented employment;</p> <p>e) Attracting new and expanding employment clusters that are important to Toronto's competitive advantage;</p> <p>f) Offering globally competitive locations for national and international business, through the provision of a wide choice of sites for new businesses;</p> <p>g) Aggressively promoting investment in Toronto in international markets; and</p> <p>h) Providing incubation space for new start-up firms to establish themselves and grow.</p> <p>2. A multi-faceted approach to economic development in Toronto will be pursued that:</p> <p>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;</p> <p>b) Protects Employment Areas as stable places of business;</p> <p>c) Provides opportunities and appropriate locations for new retail and service establishments;</p> <p>d) Encourages the expansion of health and educational institutions, and improving transit access to them; and</p>	<p>Should policy 1 b), be concerned with full-time, rather than just simply referring to stable employment opportunities?</p> <p>Seems odd to require an adverb such as 'Aggressively' in 1. b) where no other policy statement uses an adverb, just verbs. This word is superfluous. The City should also be promoting national investment as well.</p>

TABLE 1: COMPARISON OF EXISTING & PROPOSED CITY OF TORONTO OFFICIAL PLAN EMPLOYMENT POLICIES WITH PSP COMMENTS & RECOMMENDATIONS

<p>2. Universities, colleges and hospitals will be supported in efforts to better serve residents and businesses throughout the region by:</p> <ol style="list-style-type: none"> creating and advancing research and development alliances; creating new enterprises in partnership with the business community on campuses; linking to the growth of biomedical and biotechnology enterprises; and developing the skills of Toronto's labour force as organizational and technological innovations shape economic prospects. <p>3. Investment on the part of public agencies or through partnership agreements will ensure that key competitive infrastructure will be maintained, improved and extended in the following areas:</p>	<p>e) Promotes the Cultural Sector as an important element of our economy.</p> <p>3. A balanced growth of jobs and housing will be pursued to:</p> <ol style="list-style-type: none"> Maintain a complete community; Reduce the need for long distance commuting and lessen regional road congestion; and Increase the proportion of travel by transit, walking and cycling. <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> Streets and public transit; Water and sewer lines; Reliable supply of energy sources including electricity, natural gas, district energy centres and cooling systems; Telecommunications networks; and Access to Pearson International and Billy Bishop Airports. <p>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.</p> <p>7. In planning for new subways, light rapid transit and GO routes, the location of established and potential new office concentrations will be considered.</p> <p>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.</p> <p>9. Universities, colleges and hospitals will be supported in their efforts to better serve residents and businesses throughout the region by:</p> <ol style="list-style-type: none"> Creating and advancing research and development alliances; Creating new enterprises in partnership with the business community on campuses; Linking to the growth of biomedical and biotechnology enterprises; Developing the skills of Toronto's labour force as organizational and technological innovations shape economic prospects; Retaining current institutional lands for future expansion to serve a growing and ageing population within the Greater Toronto Area; and Promoting the design of campuses with a high quality public realm organized to promote visual and physical links with adjacent areas of the City. 	<p>We recommend modifications to the following policies:</p> <p><i>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 and industries. These programs will include both fiscal incentives and the priority processing of development applications for new office buildings and industries located in Employment Areas.</i></p> <p>Need to foster the involvement of universities and colleges in Employment Areas to provide assistance in the areas of research and development.</p> <p>Policies should also strengthen opportunities for intensification by encouraging industries to operate in efficient land and built form models, where practicable.</p>
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<p>1. A strong and diverse retail sector will be promoted by:</p> <ul style="list-style-type: none"> a) permitting a broad range of shopping opportunities for local residents and employees in a variety of settings; and b) supporting specialty retailing opportunities that attract tourists and residents of the broader urban region. <p>2. Traditional retail shopping streets will be improved as centres of community activity by:</p> <ul style="list-style-type: none"> a) encouraging quality development of a type, density and form that is compatible with the character of the area and with adjacent uses; b) improving public amenities such as transit and parking facilities, street furniture and landscaping; and c) encouraging and supporting effective business associations in these areas. <p>3. Retail development along the <i>Avenues</i> is encouraged and will suit the local context of built form and support the establishment of a high quality pedestrian environment.</p> <p>4. In order to provide local opportunities for small businesses and maintain the safety, comfort and amenity of shopping areas, zoning regulations for ground floor commercial retail uses in new buildings in new neighbourhoods or in <i>Mixed Use Areas</i> along pedestrian shopping strips where most storefronts are located at the streetline, may provide for a maximum store or commercial unit size based on the following considerations:</p> <ul style="list-style-type: none"> a) the prevailing sizes of existing stores and commercial units in the area; b) other indicators of opportunities for small business, such as vacancies in existing stores and commercial units; c) the provision of a range of store and commercial unit sizes to meet the range of local needs including day-to-day convenience shopping and other household goods and services; d) the potential impact of large vacant stores and commercial units at the ground floor level on the safety and comfort of the strip for pedestrians, e) the need for 'eyes on the street'; f) the rhythm and flow of storefronts on the strip; and 	<p>Add a new policy 6 to Section 3.5.2 as follows:</p> <p>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.</p> <p>Delete Section 3.5.3 and replace with the following:</p> <p>3.5.3 THE FUTURE OF RETAILING</p> <p>1. A strong and diverse retail sector will be promoted by:</p> <ul style="list-style-type: none"> 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. <p>2. Retailing areas will be improved by:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> 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. 	
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<p>b) the potential for the building design, particularly the street facade, to address the safety, comfort and amenity of the shopping area.</p> <p>In commercial heritage conservation districts where the prevailing floorplate size is an important feature of the district's heritage character, the zoning regulations for ground floor commercial retail uses in new buildings must provide for a maximum store or commercial unit size based on the foregoing considerations, and consistent with the heritage conservation district plan.</p>	<p>CHAPTER 4 POLICIES (A, Delete Section 4.6 policies and replace with the following:) 4.6 EMPLOYMENT AREAS Core Employment Areas</p> <p>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.</p> <p>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).</p>	<p>We recommend modifications to the following policies:</p> <p>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 the green industry including, vertical agriculture, and similar uses that serve planned function and business functionality.</p>
<p>1. <i>Employment Areas</i> are places of business and economic activity. Uses that support this function consist of: offices, manufacturing, warehousing, distribution, research and development facilities, utilities, media facilities, parks, hotels, retail outlets ancillary to the preceding uses, and restaurants and small scale stores and services that serve area businesses and workers.</p> <p>2. Within <i>Employment Areas</i>, places of worship, recreation and entertainment facilities, business and trade schools and branches of community colleges or universities may locate only on major streets as shown on Map 3. All existing places of worship, recreation and entertainment facilities, business and trade schools and branches of community colleges and universities legally established before the approval date of this Official Plan within <i>Employment Areas</i> are permitted.</p> <p>3. Large scale, stand-alone retail stores and "power centres" are not permitted in <i>Employment Areas</i> in the <i>Central Waterfront</i> and are only permitted in other <i>Employment Areas</i> fronting onto major streets as shown on Map 3, that also form the boundary of the <i>Employment Areas</i> through the enactment of a zoning by-law. Where permitted, new large scale, stand-alone retail stores and "power centres" will ensure that:</p> <ol style="list-style-type: none"> sufficient transportation capacity is available to accommodate the extra traffic generated by the development, resulting in an acceptable level of traffic on adjacent and nearby streets; and the functioning of other economic activities within the <i>Employment Areas</i> and the economic health of nearby shopping districts are not adversely affected. <p>4. Consideration may also be given to permit large-scale and stand-alone retail stores in locations on major streets, as shown on Map 3, that do not form the boundary of <i>Employment Areas</i>, other than in the <i>Central Waterfront</i>, only by way of an Official Plan Amendment, if it can be demonstrated, among other matters, that:</p> <ol style="list-style-type: none"> such development will not undermine the stability of industrial uses; Area and will have particular regard for the viability of industrial uses; sufficient transportation capacity is available to accommodate the extra traffic generated by the development, resulting in an acceptable level of traffic on adjacent and nearby streets; and the economic health of nearby shopping districts is not adversely affected. 	<p>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.</p> <p>General Employment Areas</p> <p>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:</p> <ol style="list-style-type: none"> Full-time elementary and/or secondary schools, are not established as an ancillary use to the place of worship; Vehicle parking is provided that is adequate to serve the congregation; and Vehicle traffic is not directed to the interior of a Core Employment Area. 	<p>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 to the satisfaction of the City of Toronto.</p> <p>4. General Employment Areas are places for business and economic activities generally-located within, and at the periphery on-the boundaries of Employment Areas, wherever a variety of secondary uses may be established without disturbing the planned and/or existing function of the Core Employment Areas. ...</p>

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<p>5. Large scale, stand-alone retail stores and "power centres" legally established prior to the approval date of this Official Plan within <i>Employment Areas</i> are permitted.</p> <p>6. Development will contribute to the creation of competitive, attractive, highly functional <i>Employment Areas</i> by:</p> <ol style="list-style-type: none"> supporting the economic function of the <i>Employment Areas</i> and the amenity of adjacent areas; encouraging the establishment of key clusters of economic activity with significant value-added employment and assessment; avoiding excessive car and truck traffic on the road system within <i>Employment Areas</i> and adjacent areas; providing adequate parking and loading on-site; sharing driveways and parking areas wherever possible; mitigating the effects of noise, vibration, dust, odours or particulate matter that will be detrimental to other businesses or the amenity of neighbouring areas; providing landscaping on the front and any flanking yard and adjacent to any public parks and open space to create an attractive streetscape and screening parking, loading and service areas; treating the boundary between <i>Employment Areas</i> and residential lands with landscaping, fencing, or other measures to minimize nuisance impacts; and ensuring that outside storage and outside processing is: <ol style="list-style-type: none"> limited in extent; generally located at the rear of the property; streets, highways, parks and neighbouring land uses; and not detrimental to neighbouring land uses in terms of dust, noise and odours. <p>7. Where the Zoning By-law permits outside storage or outside processing of goods and materials as the primary use on a property in <i>Employment Areas</i>, the outside storage or processing will:</p> <ol style="list-style-type: none"> be well-screened by fencing and landscaping where viewed from adjacent, streets, highways, parks and neighbouring land uses; and not be detrimental to neighbouring land uses in terms of dust, noise and 	<p>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.</p> <p>Retail Employment Areas</p> <p>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.</p> <p>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.</p> <p>Large Scale Stand Alone Retail Stores, Power Centres and Employment Areas</p> <p>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:</p> <ol style="list-style-type: none"> The transportation demands and impacts generated by the development are reviewed and necessary improvements and mitigation measures are identified; It is demonstrated that the existing and planned function of the economic activities within any nearby Employment Area is not adversely affected; It is demonstrated that the economic health of nearby shopping districts is not adversely affected; New public streets and/or driveways designed to City Standards for new streets as appropriate are 	<p>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 to the satisfaction of the City of Toronto.</p>
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TABLE 1: COMPARISON OF EXISTING & PROPOSED CITY OF TORONTO OFFICIAL PLAN EMPLOYMENT POLICIES WITH PSP COMMENTS & RECOMMENDATIONS

	<p>provided, adding to the area street network and providing improved pedestrian access and amenity;</p> <ul style="list-style-type: none"> 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. 	
<p>Policies for All Employment Areas</p>	<p>9. Development will contribute to the creation of competitive, attractive, highly functional Employment Areas by:</p> <ul style="list-style-type: none"> a) Supporting the existing and planned economic function of the Employment Area; 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: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> i. Limited in extent; ii. Generally located at the rear of the property iii. Well screened by fencing and landscaping where viewed from adjacent streets, highways, parks and neighbouring land uses; and iv. Not detrimental to neighbouring land uses in terms of dust, noise and odours. 	<p>There is a need to improve the consolidation and/or partitioning of land in Employment Areas to expedite business decisions and economic competitiveness.</p> <p>It is recommended that Part Lot Control, where applicable, be removed for all Core Employment Areas, which constitute 80% of the lands located within Employment Areas. This way business may add or remove lands and facilities from their operations as needed to support the business function thereof. Where rationalization of lots or land areas triggers a need for rezoning or minor variances, then that will be required to be processed.</p> <p>This avoids the need for Consent to Sewer and relying on Site Plan and Building Permits to reduce the planning processing requirements associated within a competitive business environment.</p>
	<p>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.</p>	
	<p>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:</p> <ul style="list-style-type: none"> 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. 	
	<p>12. Definitions</p> <p>Employment Areas are all lands designated on Maps 13 to 23 as Core Employment Areas, General Employment Areas, and Retail Employment Areas.</p>	<p><i>l) Ensuring that outside storage and outside processing is:</i> <i>1. Limited in extent to the needs of the business operation in keeping with planned function and the scale of the manufactured product and packaging for transportation and distribution efficiencies;</i></p>

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<p>1704Table_Mar.1.13</p>	<p>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.</p> <p>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.</p> <p>Within Employment Areas, Large-Scale Stand-Alone Retail Stores and Power Centres are considered to be major retail uses.</p> <p>The term Municipal Comprehensive Review has the same meaning as the definition in the Growth Plan for the Greater Golden Horseshoe, 2006.</p>	
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