



PG24.6.11

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# The Toronto Industry Network

## DEPUTATION FOR PLANNING AND GROWTH MANAGEMENT COMMITTEE MEETING – THURSDAY, MAY 16, 2013

### **Re: PG24.5 Official Plan/Municipal Comprehensive Reviews: Preliminary Assessment of Additional Conversion Requests, and PG24.6 Official Plan/Municipal Comprehensive Reviews: Results of Public Consultations on Draft Policies and Designations for Economic Health and Employment Lands**

The Toronto Industry Network (TIN) believes the net effect of the OP review must be the creation of an Official Plan that will bring a stable land use environment to the manufacturing community. This includes making employment lands more affordable to industry by lessening their speculative value for conversion to other uses. This will have the beneficial effect of enhancing our City's employment diversity and creating more wealth for Toronto.

While TIN is generally supportive of the direction the staff reports are taking regarding PG24.5 and PG 24.6, it wishes to draw the attention of Committee members to the following points:

#### Draft Employment Designations

- The definition for the function of 'Core' employment areas contained in the Official Plan policy needs to be strengthened with stronger language referring to manufacturing. Current language lists offices, research and development facilities first and then manufacturing. The primary function for 'Core' areas must be to provide a home for a wide range of manufacturing activities.
- The word 'Core' should be replaced because of its ambiguity in referring to location as well as function. This will cause the City and industry future difficulties in working to protect employment lands.
- While offices are not as disruptive to the manufacturing community as sensitive uses are, the City should not encourage office development in 'Core' employment areas. Office development has a much greater opportunity to locate in various parts of the City compared to industrial.
- TIN is supportive of the staff proposal to create two designations of General Employment and Core Employment areas.

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Sensitive Uses

- Existing sensitive uses and those pending through the many conversion requests are presenting significant challenges to some TIN members. For example, when a manufacturing facility has to re-apply for its Certificate of Approval, it may find itself out of compliance because a sensitive use is located or will be located nearby. All the good work the City is undertaking to strengthen its manufacturing sector could be undermined by these sensitive uses.
- TIN notes that the onus is on the manufacturers to mitigate to mitigate conflict with sensitive use neighbours, not the other way around. Policies to require new sensitive uses to bear the cost of mitigation should be included in the Official Plan.
- Existing sensitive uses must not be allowed to expand their facilities. For example, existing places of worship may try to add a school or daycare function.

Conversion Requests

- TIN does not generally support conversion requests that result in a net loss of employment lands, given staff and consultant findings that there is a need to retain employment lands, and no need for additional residential lands
- Official Plan Employment Area policies will be put to the test when conversion requests are addressed by City Council or the Ontario Municipal Board. These policies need to be as straightforward and strong as possible in preserving employment lands.

We thank you for your attention.



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Director of External Affairs