



*working to keep jobs in South Etobicoke*

November 20, 2013.

**BY E-MAIL**

**pgmc@toronto.ca**

Chair and Members,  
Planning and Growth Management Committee,  
City of Toronto,  
City Clerk's Office,  
Toronto City Hall,  
100 Queen Street West,  
10<sup>th</sup> Floor, West Tower,  
Toronto, ON, M5H 2N2

Attention: Ms. Nancy Martins, Administrator,  
Planning and Growth Management Committee

Dear Chair and Members,

**Re: PG 28.2 Planning for a Strong and Diverse Economy: Official Plan/Municipal Comprehensive Reviews - Proposed Economic Health Policies and Proposed Policies and Designations for Employment Lands**

The South Etobicoke Industrial Employers' Association (SEIEA) represents a group of manufacturers who employ over 2000 employees in South Etobicoke. SEIEA advocates for the retention and growth of industrial employment in both South Etobicoke and throughout Toronto generally.

SEIEA has been involved with the Five Year Review and Municipal Comprehensive Review of Employment Lands since their inception. SEIEA has reviewed the staff report dated November 5<sup>th</sup>, 2013, and the accompanying Attachments 1 (Proposed Official Plan Amendment) and 2 (Final Assessments of Requests to Convert Employment Lands).

We support the staff recommendations and key policy directions, particularly for ***preserving Employment Areas for industrial uses***.

We also support staff's recommendation to retain over 97 per cent of the land currently designated as Employment Areas by denying the majority of conversion requests.

The concentration of conversion requests (16) along the QEW/Gardiner Corridor in the middle of the South Etobicoke Employment Area, could threaten the stability and long-term growth of the employment lands in this area. We agree with staff that these locations pose environmental constraints of noise and air quality for residential use and would remove highly accessible and visible sites with major highway access for goods movement from employment purposes. The retention of these lands, as recommended by staff, for Employment Areas is consistent with both the Provincial Policy Statement and the Growth Plan.

SEIEA has concerns about the process for dealing with conversion requests that have come in past the staff cut-off date for reporting to the Committee. An example is the recent request (September 4, 2013) for consideration of a conversion from Employment Areas to Neighbourhoods at 302 and 320-324 Horner Avenue which proposes residential use adjacent to existing industrial operations on lands both east and south of the site. SEIEA is concerned about potential impacts of this proposed conversion on existing neighbouring manufacturers. What is the process for staff evaluation of conversion requests prior to Council consideration and how will affected landowners be notified? SEIEA requests that staff prepare written evaluations on all conversion requests prior to their consideration by Council.

Some policy refinements are included in the following recommendations:

### **1. Important Isolated Industrial Sites:**

*Policy 2.2.4.1 states: Employment Areas, as shown on Map 2, are comprised of both Core Employment Areas and General Employment Areas, as shown on Maps 13-23 inclusive. Employment Areas are areas designated in this Plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities.”*

The inclusion of the PPS definition strengthens the policy for employment lands but may weaken the protection of isolated employment sites where individual industries may be deemed to not constitute “clusters”. The Official Plan should be explicit about the existence and significance of these types of Employment Areas thus providing the same policy protection.

### **2. Sensitive Uses In Employment Areas:**

General Employment Areas still permit two types of recreation and entertainment uses: fitness centres and ice arenas. Further, there are a number of sensitive uses already existing within Employment Areas that may expand.

It is SEIEA’s opinion that the same policies should apply to protect industries within the Employment Areas where sensitive uses are new or expanding and could be subject to potential industrial off-site effects.

If the two types of recreation and entertainment uses, fitness centres and ice arenas, permitted in General Employment Areas are considered as sensitive uses by the MOE, then the appropriate environmental studies, as outlined in the former draft amendment should be reinstated to evaluate if users will potentially be affected by adverse effects from off-site emissions from industry or city works yards.

### **3. Clarification of Neighbouring Land Uses:**

Policy 4.6.6 reads in part: *“Development will contribute to the creation of competitive, attractive, highly functional Employment Areas by:*

*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...*

*l) Ensuring that where the zoning by-law(s) permit open storage and/or outdoor processing of goods and materials, the open storage and processing is:...iv) not adversely affecting existing and planned neighbouring land use in terms of dust, noise and odours.”*

Policy 4.6.6 i) and l) iv) also include off-site effects to 'neighbouring areas' and 'planned neighbouring land uses.' Because of the language used in Policy 2.2.4.5 ('adjacent or near to') the term 'neighbouring land uses' used in this section may be confusing. It needs to clarify if the 'neighbouring land uses' are within Employment Areas or neighbouring land uses 'adjacent or near to' Employment Areas. The planned neighbouring land uses would have already accounted for any mitigation as per Policy 2.2.4.5 if applicable (sensitive use) and for other planned neighbouring uses already permitted, i.e. offices etc. it should again be the responsibility of the proponent of the new use to ensure compatibility with existing uses, consistent with the proposed policy approach.

#### 4. Detailed Requirements of a Zoning Nature:

Policy 4.6.6j): *"Development will contribute to the creation of competitive, attractive, highly functional Employment Areas by:*

*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;"*

This policy is very detailed for an Official Plan and more restrictive in some cases than the City's new Zoning By-law. The requirement for screening of all parking, loading and service areas is onerous and not appropriate in all Employment Areas. The requirement to provide landscaping on the front and flanking yard may conflict with the objective of creating "competitive, highly functional" and higher density Employment Areas. The policy should be considered on a more location specific basis.

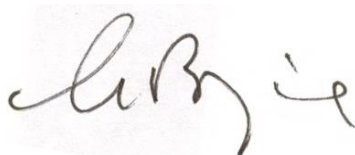
We request the Committee to refer these matters to staff before adoption of the final amendment.

SEIEA reserves the right to provide additional comments and concerns as this amendment goes through further refinements and Council approval. Further, SEIEA's comments stated above are strictly without prejudice to any position that individual member companies might take in relation to the current Official Plan and Municipal Comprehensive Reviews.

Please keep us apprised of the status of the amendment by providing us with copies of any further staff reports, notice of any further public meetings, committees of Council meeting and Council meetings and copies of all decisions made by Council, that are concerned with this amendment.

Thank you for your assistance in this matter.

Yours very truly,



South Etobicoke Industrial Employers' Association  
Al Brezina, Executive Director

cc. Councillor Mark Grimes, *Ward 6*  
*S. Keir, KeirCorp*