November 19, 2013

Councillor Milczyn
Planning and Growth Management Committee
City Hall
10th floor, West Tower
100 Queen Street West
Toronto, Ontario, M5H 2N2

Dear Councillor Milczyn and Members of the Planning and Growth Management Committee:

In my capacity as Chair of Toronto’s Economic Development Committee, I would like to express firm opposition to the conversion of 4646 Dufferin Street from Employment District to Mixed Use as requested by Dennis Wood on behalf of the owner 2129152 Ontario Inc.

The conversion request proposes two 20-storey residential buildings, two 7-storey "seniors' transitional housing" buildings, a private community centre and other related facilities.

Most concerning from a local perspective is that immediately to the west are chemical and furniture manufacturing facilities. Located within 20 metres of the conversion request site is Toronto Research Chemicals (TRC), a manufacturer of biomedical research chemicals with more than 100 employees in mostly higher wage, knowledge-based positions.

At any given time TRC has approximately 5,000 litres of solvents and 3,000 litres of waste solvents on site that are both toxic and flammable. Although TRC handles those solvents in accordance with required standards, the encroachment of the proposed residential development into employment lands would increase public safety risks to unacceptable levels. The Ministry of the Environment has expressed concern to the company about a residential development locating in close proximity to their facility.

If such a development is allowed to proceed, TRC would face significant challenges to meet provincially-mandated requirements, as the company is currently required to maintain a minimum separation of 300 metres from sensitive uses such as residential developments.

It is likely that if the conversion proposal is approved, TRC would, at a minimum, incur significant additional costs to remain compliant with provincial environmental requirements. At worst, the company would be forced to cancel expansion plans and move its operations, and its jobs, to another location, most likely outside of the City of Toronto. Similarly, the conversion to residential uses is likely to curtail expansion plans by other nearby industries.
From a broader economic development perspective, most concerning is the impact of another loss of employment lands (and the successful businesses and jobs they support) on the long-term health of the City’s economy and the quality of available employment. The continuing trend toward conversion of Toronto’s shrinking stock of employment lands has a dramatic impact on the City’s economic potential. Toronto’s economic growth and employment goals are only reachable if our current employment lands remain intact and are protected from conversion. While there may be cases where it makes sense to look creatively and flexibly at certain employment lands, this proposal is not one of them. It does the City no good to undermine the potential expansion of successful enterprises in favour of residential developments, long term care and other use with negligible long-term employment potential.

If Toronto is to be seen as a viable place to do business, and an attractive location for foreign direct investment and business expansion, we need to have places for companies to locate. To send the right message to business investors, the City must protect our employers and defend our overall employment land base from the encroachment of residential uses. Toronto is at a crisis point, and any additional loses of these lands will have serious, irreversible economic consequences.

I recommend in the strongest terms that this conversion request be denied and that the 4646 Dufferin Street site be retained and protected for employment uses.

Yours truly,

Michael Thompson
Chair, Economic Development and Culture Committee
Councillor, Scarborough Centre
Ward 37

c.c. Nancy Martins