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December 7, 2015

13th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Members of City of Toronto Council

Dear Sirs/Mesdames:

Re: Item PG8.5
Official Plan Five Year Review: Final Recommendation Report –
Amendments to the Healthy Neighbourhoods, *Neighbourhoods* and
***Apartment Neighbourhoods* Policies of the Official Plan**
OPA No: Proposed Official Plan Amendment No. 320
Client: The Toronto Industry Network
Property: Various

We are the solicitors for the Toronto Industry Network (“TIN”) with respect to the above-noted matter. TIN is an incorporated organization made up of mostly large manufacturers with facilities in Toronto or manufacturing/business associations with members engaged in manufacturing. Collectively, TIN represents industries that have more than 30,000 direct employees.

We have reviewed proposed Official Plan Amendment No. 320, as contained in the Final Recommendation Report, dated October 15, 2015, in the context of the proposed modifications recommended by the Planning and Growth Management Committee at its meeting held on November 16, 2015 (“OPA 320”). Our client has concerns with OPA 320.

Amendment 231 to the Official Plan of the City of Toronto with respect to the Economic Health Policies and the Policies, Designations and Mapping for Employment Areas (“OPA 231”) has policies requiring sensitive land uses proposed outside of, but adjacent to or near to, *Employment Areas* to undertake land use compatibility studies and implement mitigation measures (Policy 2.2.4.5) and the boundary between *Employment Areas* and *Neighbourhoods* and *Apartment Neighbourhoods* being required to be treated with landscaping, fencing, or other measures to provide a buffer and minimize adverse impacts (Policy 4.6.5(k)). To be

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effective, reciprocal policy requirements must be incorporated in the *Neighbourhoods* and *Apartment Neighbourhoods* designations of OPA 320, however, there are no such policies.

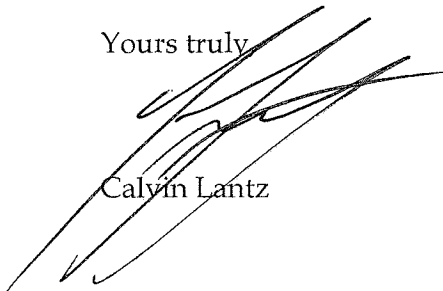
In order to promote land use compatibility, policies should be added to OPA 320 to provide a framework to allow the City to classify sensitive land uses proposed outside of *Employment Areas* but within the influence area of industrial uses (where emissions may cause an adverse effect) as Class 4 Areas in accordance with the requirements of MOECC Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300 (“NPC - 300”), as amended or replaced from time to time. Such policies, if implemented correctly, are potentially beneficial to both employment uses and the development of new sensitive land uses.

Lastly, OPA 231 requires a “gradation of zones” in *Employment Areas* on the basis of operations and impacts to ensure a compatibility of uses (Policy 4.6.6). Yet there are many instances throughout the City where heavy industrial zones abut residential zones. OPA 320 should similarly consider the notion of gradation in proximity to *Employment Areas* because land use compatibility should not only be achieved at the expense of industry.

Please note that we reserve the right to raise further issues with OPA 320 that may arise. Additionally, please provide us with notice of all upcoming meetings of Council and Committees of Council at which OPA 320 will be considered as well as notice of any Council or Committee decisions.

If you have any questions or require further information, please contact the undersigned. Thank you for your attention to this matter.

Yours truly,



Calvin Lantz

CWL/nla

cc. Andrew Judge, Redpath Sugar Ltd.