



Toronto Industry Network

February 22, 2019

Mayor John Tory and Members of Council,
12th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Marilyn Toft

Dear Mayor Tory and Members of Council:

**Item: PH2.4 - Proposed Amendments to the Growth Plan for the
Greater Golden Horseshoe, 2017 - Preliminary City Comments
City Council Consideration on February 26, 2019**

The Toronto Industry Network (TIN) welcomes the opportunity to comment on the City Staff Report, "Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 – Preliminary City Comments", dated February 12, 2019 (Staff Report), and the Planning and Housing Committee recommendations to Council regarding proposed amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 (Growth Plan).

As you are aware, TIN is an incorporated organization made up of mostly large manufacturers with facilities in Toronto or manufacturing/business associations with members engaged in manufacturing.

General

Employment Area designated lands are a finite resource. Residential uses may be located in almost every land use designation category but manufacturing and processing uses can only be located in one - Employment Areas. If Toronto is to provide a wide-range of employment opportunities for its growing population then Employment Areas need to be protected from the intrusion of sensitive uses and from the development of incompatible land uses in proximity to Employment Area, as sensitive uses can destabilize the operating environment of industries and sterilize employment lands.

In addition to recommendations and issues identified in the Staff Report, TIN wishes to emphasize that the Growth Plan Amendments fail to protect industry in the following ways:

1. The proposed Provincially Significant Employment Zones (PSEZs) boundaries are not

accurate or appropriate as there are industries that are located on municipally designated Employment Area lands that are located just outside of areas that are proposed to be identified as PSEZs;

2. There are many industries that are located on lands that municipally designated as Employment Area, but are not proposed to be identified as PSEZs at all;
3. There are legacy industries that are located on lands that are not municipally designated as Employment Area and the protections that the Growth Plan formally afforded such industries in terms of land use compatibility, have been reduced or removed entirely; and
4. The Growth Plan Amendments deemphasize the potential impact of development and land use in proximity to Employment Areas and PSEZs, particularly in proximity to Transit Stations, and where there are competing policies there is no direction on which policies should take priority.

Staff Report Review

In reviewing the staff report, TIN has the following comments:

Recommendations 1, 2 & 3:

TIN agrees with the concerns of Planning staff that having PSEZs and non-PSEZs sends the wrong message – it creates a two tiered system of Employment Areas, where one is more deserving of protection than the other. How can the City or others argue that non-PSEZ lands should be protected and not be converted? It sets the City up for failure in terms of maintaining Employment Areas designated lands and maintaining existing and attracting new industry.

TIN encourages and supports the City's request to the Province to designate all Employment Areas in their entirety, in the City of Toronto, as PSEZs. Leaving out some Employment Areas puts at risk many jobs and creates uncertainty for manufacturers. Not to do so sends a clear signal to the development community that industrial lands that are not PSEZs are open to conversion.

Also, it is apparent that the identification of Provincially Significant Employment Zones (PSEZs) were the result of a desktop analysis that has not been ground truthed. As a result, there are industries that are located on municipally designated Employment Area lands that are just outside of areas that are proposed to be identified as PSEZs. The proposed PSEZ boundaries are not accurate or appropriate and need to be adjusted to include all Employment Area lands. For

example, Sanofi Pasteur's campus (Steeles Avenue West) is located adjacent to PSEZ Zone Number 9 to the west.

Recommendation 4: TIN agrees with staff's recommendation and points out that almost all Employment Areas have agri-food businesses located in them. Toronto has the second largest food industry cluster in North America after Los Angeles.

Recommendations 10, 11 & 12: It is unclear from the proposed changes to the Growth Plan whether a municipality can delineate the boundaries of a Major Transit Station Area (MTSA) and identify minimum density targets for this area in its official plan (which can occur in advance of a municipal comprehensive review) on lands that are also subject to a PSEZ. There is no guidance in the Growth Plan changes to clarify which policies take precedence.

TIN supports the City's position that the Growth Plan's Employment policies should take precedence and prevail over any MTSA density targets or policies.

TIN's Additional Concerns and Comments on Growth Plan Changes

Where TIN's position differs slightly from the City's is with respect to the scale of development and land uses that may occur in proximity to PSEZs and Employment Areas. The proposed changes to the Growth Plan directly address this form of threat by requiring in 2.2.5.7.d that, "*an appropriate interface between employment areas and adjacent non-employment areas*" be provided "*to maintain land use compatibility*". This new policy suggests that some form of land use control and/or buffering should be imposed between sensitive uses and employment areas.

However, 2.2.5.7.d is located in the Employment section of the Growth Plan and although the Plan is to be read as a whole, lands external to Employment Areas and PSEZs will not consider such Employment policies to be applicable. Also, how does one "*maintain land use compatibility*" in light of the Growth Plan's persistent emphasis on "*an intensification first approach to development and city building*"? TIN is concerned that on lands external to Employment Areas the overwhelming policy support for intensification in the Growth Plan will supersede any land use compatibility objectives.

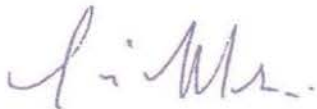
The concept of appropriately designing, buffering and separating industries (whether they are on lands designated Employment Area or otherwise) and sensitive land uses, preventing adverse effects, achieving land use compatibility and ensuring the long-term viability of such industrial uses is required by the 2014 Provincial Policy Statement [1.2.6.1]. Such land use compatibility criteria were formerly enshrined in the Growth Plan policies, but with the proposed amendments have been scoped down or removed.

For example, legacy industries that are not located on Employment Area designated lands are no longer protected by the Growth Plan as amended. Compatibility criteria only apply to the interface between Employment Areas and non-employment areas [2.2.5.7].

It is not in the best interests of the City or the Province to amend the Growth Plan to reduce the protections for legacy industries. TIN recommends that the protections of the PPS for legacy industries and all other industries in Policy 1.2.6.1, be restored to the Growth Plan.

We thank you for your attention and trust that you will act on the points we have raised.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. McLuckie', is positioned above the typed name.

Craig McLuckie,
President