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BY E-MAIL

councilmeeting@toronto.ca

Toronto City Council
c/o Marilyn Toft
12th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

To: Mayor Tory and Members of Council

**Re: PH2.4 Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017
– Preliminary City Comments**

The South Etobicoke Industrial Employers' Association (SEIEA) represents a group of manufacturers and industrial businesses, covering several industry sectors including food processing and distribution, chemical processing, automotive, and industrial supplies, etc. Many have been in operation in South Etobicoke for many years. SEIEA advocates for the retention and growth of industrial employment in both South Etobicoke and throughout Toronto generally.

We have reviewed the "Proposed Amendments to the Growth Plan for the Greater Golden Horseshoe, 2017 issued by the Province of Ontario", and also the "City Chief Planner's report to Planning and Housing Committee – Preliminary City Comments".

We have several concerns with the provincial proposal to create Provincially Significant Employment Zones (PSEZs).

1. The proposed PSEZs do not include many of the currently designated employment areas, yet all of these current employment areas are needed to support employment for the City's residents. The act of designating some of the City's presently designated Employment Lands as Provincially Significant Employment Zones, puts pressure on the non-designated lands for conversion during the 'one-time window' as well as in future MCRs. The staff report points out that only 67% of the current Employment Area land base is included in the PSEZs which leaves a large proportion - 33% - open for possible conversion to sensitive uses. The loss of these lands to non-employment uses would have a significant impact on jobs for residents in the City. Currently, employment land is in high demand and many businesses have experienced difficulty in finding additional land for employment uses. In fact, there are no PSEZ's designated by the province south of Hwy 401 in the City, with the exception of the South Etobicoke Employment Area. We support the staff report recommendation to request that additional employment areas be included as per item 2 in the Staff Report, and we recommend that the City request that all current Employment Areas be included.

2. The boundaries of the proposed PSEZ's do not match the boundaries of the existing Employment Areas. This means that some areas on the border of an Employment area are susceptible to conversion to a sensitive use. When the current Employment Areas were first designated by the City in last MCR, the boundaries were based on considerable research and investigation by planning staff. The proposed PSEZ boundaries have not considered the impact of excluding these border areas and the destabilizing impact they would have on the PSEZ if they are converted to a sensitive use. We request that the City request that the following boundaries are changed, along with any others to match current Employment Area designations.

In the proposed 427/QEW PSEZ Zone 13, for the South Etobicoke portion, the following boundaries need to be adjusted:

- The lands on either side of Thirtieth St. and the east side of Carson St. from the railway tracks north to Horner Ave. are currently designated as Employment but these lands are not included in the PSEZ. This street bisects the South Etobicoke employment area and conversions on these lands would impact neighbouring industries, which in turn would destabilize the whole employment area and this portion of the PSEZ.
 - The lands west of Islington Ave., South of New Toronto St., on Toffee Court have been excluded from the PSEZ. There is a waste transfer station immediately to the north, and industries to the west and south of these lands. This land should be included in the PSEZ, since a potential conversion would introduce conflicts with the surrounding employment uses and destabilize that area.
 - The lands immediately east of Islington, north of Evans Ave. and south of the QEW are currently designated as Employment but are not included in the PSEZ.
 - The lands north of the QEW, west of Royal York, and south of Sinclair St. are currently designated as Employment but are not included in the PSEZ, and conversions could destabilize the employment area to the west.
 - The lands east of Park Lawn, south of the Queensway and extending to Lakeshore Blvd. are currently designated as Employment are also excluded from the PSEZ. The land immediately to the north of this contains a municipal sewage treatment plant, and they include a portion of the Gardiner Expwy. Maintaining these lands as employment through a PSEZ designation would ensure they continue to act as a buffer between the sewage treatment plant to the north and the high density residential on the south side of Lakeshore Blvd.
 - A more precise review of the mapping may reveal other boundary issues with implications on the surrounding employment area. We encourage the City to undertake this detailed review and request that the City request that its Employment Area boundaries be used by the Province for the PSEZ. Item 2 in the Staff Report deals with "recognizing and including additional PSEZs..." but does not mention reviewing the boundaries of the proposed ones in detail and requesting changes to match the existing Employment Areas.
3. The Ontario Food Terminal is not included in the PSEZ. This is an important regional asset in the Agri-Food supply chain which plays a critical role in distributing fresh

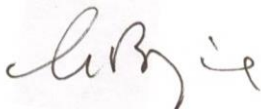
produce in the City of Toronto. Many food processing and distribution companies that have operations in the South Etobicoke Employment Area (within the designated PSEZ) use the Food Terminal and/or also have operations at the Food Terminal. A potential conversion of the Food Terminal lands would impact these food businesses located locally in South Etobicoke, as well as others in the region. The Ontario Food Terminal lands should be included in the PSEZ as per item 4 in the Staff Report.

4. The new proposed provincial amendment to the Growth Plan increases the radius of Major Transit Station Areas from 500m to 800m. This increase overlaps part of the South Etobicoke Employment Area, including the newly proposed PSEZ. Development at Major Transit Station Areas could introduce sensitive uses and create conflicts with employment uses. We support planning staff's recommendation 12 which requests the Province to include a new policy stating that in cases of an overlap, that the Employment Policies take precedence and that the City's Employment Area density targets take precedence over any other.
5. There are some employment uses in the City that are not located in a designated Employment Area. This can include legacy industries, some of which are quite sizeable employers, support other industries in important sectors and seek to continue operations unimpeded from new development. Currently, there is a requirement for any sensitive uses in their proximity to ensure they are compatible. This will no longer be required under the proposed amendment. City planning should request that the appropriate protections be re-established.
6. The proposed amendment introduces the requirement for an appropriate interface between employment areas and non-employment areas. This should be more clearly stated to ensure that it is understood and applied to lands that are not in employment areas as intended in the amendment. The concept of a buffer should be strengthened to ensure that employment lands and PSEZs and the jobs they hold are properly protected.

Employment lands are an important resource for City residents. They are limited and once converted to another use, can't be recovered, and employment opportunities will be lost. We recommend that Council take the appropriate actions to ensure that employment lands are preserved as the Province considers changes to the Growth Plan.

Thank you for your consideration of these items.

Yours very truly,



Al Brezina

Executive Director
South Etobicoke Industrial Employers' Association (SEIEA)
abrezina@seiea.ca
www.seiea.ca