



1885 Wilson Avenue, Suite 209
 Toronto, ON M9M 1A2
info@emeryvillagebia.ca
www.emeryvillagebia.ca
 T: 416.744.7242 F: 416-744-7857

February 22, 2019

City of Toronto
 Ulli S. Watkiss, City Clerk
 100 Queen Street West, 13 FL West Tower
 Toronto, ON
 M5H 2N2

Dear Ms. Watkiss,

Re. City Council's consideration, on February 26, 2019, of comments regarding Provincial planning policies and regulations having an impact on protecting the planned role and function of employment lands, as detailed in the report from the Chief Planner and Executive Director, City Planning, PH2.4, dated February 12, 2019.

Thank-you for the opportunity to provide feedback on proposed changes to Provincial planning and development policies, including the 2017 Growth Plan for the Greater Golden Horseshoe (Growth Plan), as part of the Provincial Government's stated intentions to increase the supply of housing, retain and attract business investment, and to streamline planning and development approval processes. We, in serving the interests of land owners and business operators in one the largest and most important employment areas in the Greater Toronto Area, are generally supportive of those proposed changes and have the following more detailed comments and suggestions.

1. o The Emery Village BIA is in general agreement with the City's comments on the proposed changes. We applaud the City's long-established record of providing protections for employment lands, most recently through the adoption in 2013 of Official Plan Amendment No. 231 (Municipal Comprehensive Review) to provide firm protections for core employment lands, which include those within the Emery Village BIA.
2. o We support the creation of Provincially Significant Employment Zones (PSEZ) to recognize the importance of, and provide long-term protections for, large-scale and viable employment areas. The Emery Village BIA boundaries are almost wholly located within the proposed PSEZ located within and generally west of the Highway 400 corridor, in that segment between Highway 401 and Steeles Avenue. This employment land, which includes successful trucking, warehousing, logistics and manufacturing operations, is at a premium owing to a combination of non-employment development (e.g. residential) pressures and proximity to legacy transportation infrastructure including freight rail lines, 400-series highways, and Pearson International Airport.
3. o We advise caution with respect to proposed changes to enable the conversion of employment lands, located outside of PSEZs, to facilitate development approvals for non-employment uses including places of worship and housing. In addition to creating a net loss in employment lands, this could also have the unintended consequence of creating conflicts – including noise and air pollution, and traffic congestion – between pre-existing industrial operations and newer, more sensitive land uses such as residential. While we acknowledge that some employment lands, including fragmented and/or smaller sites, may merit re-development for other uses there should be safeguards in place to mitigate against potentially harmful interactions between vastly different activities.
4. o We support appropriate higher-density, mixed-use development at and around rapid transit stations, including those planned for the Finch West LRT which bisects the Emery Village BIA, as

envisioned by the in-force Major Transit Station Area (MTSA) policies of the Growth Plan. What we do not support, however, is increasing the MTSA zone of influence from the current 500 metres to 800 metres around each station. This could have the effect, especially in important employment areas such as the Emery Village BIA, of undermining the planned function of employment lands located in proximity to Priority Transit Corridors such as Finch West. We understand that the City will be developing an implementation framework for MTSA's, including the Finch West corridor, and we look forward to working with you through that process, towards an approach that appropriately balances transit-oriented development with the preservation of employment lands.

5. We have some uncertainty in interpreting the intent and implications of the proposed changes to Provincial planning policies which appear to simultaneously provide long-term protections for employment lands and allow for the re-designation of employment lands to encourage higher-density and transit-supportive development. This is especially concerning for us since the BIA contains lands which fall within the definition of both Provincially Significant Employment Zones and Major Transit Station Areas. Which will take precedence over the other in the case of a conflict? There must be a clear and definitive way to answer this question.
6. We are committed to working with the City towards mutually beneficial policies and implementation strategies to ensure ongoing protections for, and the viability of, employment lands. We will continue to provide comments to City departments, including City Planning, in responding to circulations of proposed development applications through the City's planning review and approval process. Of particular interest to the BIA is guarding against the fragmentation, through consent to sever applications, of employment parcels and the introduction of sensitive land use within and adjacent to core employment lands.

We thank-you, once again, for the opportunity to provide comments and trust that we will continue to be consulted as your process evolves. In the meantime, we welcome any questions you may have about our perspectives and circumstances. To that end, please contact Al Ruggero by telephone at 416-744-7242 or by email at al@emeryvillagebia.ca.

Sincerely,

Sandra Farina, Executive Director



Al Ruggero, Project Manager



cc. The Honourable Steve Clark, Minister, Ministry of Municipal Affairs and Housing
Kerri Voumvakis, Director, Strategic Initiatives, Policy and Analysis, City Planning



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February 22, 2019

Ministry of Municipal Affairs and Housing
The Honourable Steve Clark, Minister
777 Bay Street, 17th Floor
Toronto, ON
M5G 2E5

Dear Minister Clark,

Re. Proposed changes to Provincial planning policies and regulations having an impact on protecting the planned role and function of employment lands

Thank-you for the opportunity to provide feedback on proposed changes to Provincial planning and development policies, including the 2017 Growth Plan for the Greater Golden Horseshoe (Growth Plan), as part of the Government's stated intentions to increase the supply of housing, retain and attract business investment, and to streamline planning and development approval processes. We, in serving the interests of land owners and business operators in one the largest and most important employment areas in the Greater Toronto Area, are generally supportive of the proposed changes and offer the following more detailed comments and suggestions.

1. We support the creation of Provincially Significant Employment Zones (PSEZ) to recognize the importance of, and provide long-term protections for, large-scale and viable employment areas. The Emery Village BIA boundaries are almost wholly located within the proposed PSEZ located within and generally west of the Highway 400 corridor, in that segment between Highway 401 and Steeles Avenue. This employment land, which includes successful trucking, warehousing, logistics and manufacturing operations, is at a premium owing to a combination of non-employment development (e.g. residential) pressures and proximity to legacy transportation infrastructure including freight rail lines, 400-series highways, and Pearson International Airport.
2. We advise caution with respect to proposed changes to enable the conversion of employment lands, located outside of PSEZs, to facilitate development approvals for non-employment uses including places of worship and housing. In addition to creating a net loss in employment lands, this could also have the unintended consequence of creating conflicts – including noise and air pollution, and traffic congestion – between pre-existing industrial operations and newer, more sensitive land uses such as residential. While we acknowledge that some employment lands, including fragmented and/or smaller sites, may merit re-development for other uses there should be safeguards in place to mitigate against potentially harmful interactions between vastly different activities.
3. We support appropriate higher-density, mixed-use development at and around rapid transit stations, including those planned for the Finch West LRT which bisects the Emery Village BIA, as envisioned by the in-force Major Transit Station Area (MTSA) policies of the Growth Plan. What we do not support, however, is increasing the MTSA zone of influence from the current 500 metres to 800 metres around each station. This could have the effect, especially in important employment areas such as the Emery Village BIA, of undermining the planned function of employment lands located in proximity to Priority Transit Corridors such as Finch West.
4. We have some uncertainty in interpreting the intent and implications of the proposed changes to Provincial planning policies which appear to simultaneously provide long-term protections for

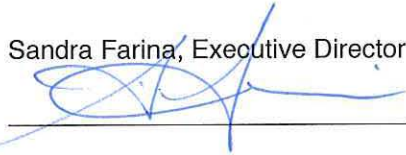
employment lands and allow for the re-designation of employment lands to encourage higher-density and transit-supportive development. This is especially concerning for us since the BIA contains lands, which fall within the definition of both Provincially Significant Employment Zones and Major Transit Station Areas. Which will take precedence over the other in the case of a conflict? There must be a clear and definitive way to answer this question.

5. The Emery Village BIA and the City of Toronto are coordinating and are in general agreement with each other's comments regarding the proposed changes to Provincial planning and development policies. The City has a long-established record of providing protections for employment lands, most recently through the adoption in 2013 of Official Plan Amendment No. 231 (Municipal Comprehensive Review) to provide firm protections for core employment lands, which include those within the Emery Village BIA. We encourage the Province to continue to seek advice from municipalities on how best to protect the viability of employment lands, and to continue to engage with land owners and operators to better understand and respond to the unique opportunities and challenges inherent to planning for and protecting employment lands.

We thank-you, once again, for the opportunity to provide comments and trust that we will continue to be consulted as your process evolves. In the meantime, we welcome any questions you may have about our perspectives and circumstances. To that end, please contact Al Ruggero by telephone at 416-744-7242 or by email at al@emeryvillagebia.ca

Sincerely,

Sandra Farina, Executive Director



Al Ruggero, Project Manager



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