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September 13, 2021

Nancy Martins, Secretariat
Toronto Planning and Housing Committee
phc@toronto.ca

SENT BY ELECTRONIC MAIL

Dear Ms. Martins,

**Re. Report No. PH25.5, September 21, 2021 (Deferred from the meeting June 28, 2021)
Zoning Conformity for Official Plan Employment Areas – Phase 1 Final Report**

We, the Emery Village BIA, request that this zoning conformity process be suspended to allow for further study and consultations with landowners and businesses within Employment Areas. If approved by Committee and Council, Phase 1 of this process will remove as-of-right land use permissions for a range of employment-supporting uses along major streets within our BIA boundary, adding to the hardship and uncertainty our members have already endured.

The BIA has strong concerns about how the proposed Employment Areas (OPA 231) zoning conformity changes will impact its member landowners and businesses, and their employees. While the BIA supports, in principle, land use planning to protect and support employment lands, the proposed zoning changes could have the opposite effect. Businesses need flexibility to adapt and grow their operations to respond to market trends and competition, especially while enduring over 18 months of interruptions and uncertainties from the COVID-19 pandemic and related lockdowns. Furthermore, removing permissions could reduce the amenities and services that contribute to a complete and vibrant employment-focused community, and which provides a good environment for employees.

We strongly urge, and would appreciate, a pause in this process in consideration of the following:

1. The changes, under OPA 231, to Toronto's Official Plan Employment Areas policies were adopted in 2013.

Are these employment area policies still appropriate, given that 8 years have passed and in the past 18 months alone the economy has undergone unprecedented changes and shocks? Market trends and the needs of businesses, even before COVID, have already shifted significantly since 2013. We should be confident, supported by current data and additional input from businesses, that zoning will implement changes that are the most responsive and supportive of employment area businesses. As currently proposed, we don't believe they are.

2. Reducing the permitted uses within employment areas could harm business attraction, innovation and retention.

The Emery Village BIA is located immediately south, along Steeles Avenue, of a major employment area within the City of Vaughan. We are also close to the Cities of Brampton and Mississauga who, like Toronto, are competing for business investment in lands with convenient highway access to Pearson Airport. However, in contrast to our neighbours, our employment policies and zoning are poised to become even more restrictive; this will surely impact the ability of our businesses to adapt to an ever-changing market, and undermine investor confidence in the current and future prospects of lands within our BIA. Closed or

scaled-backed operations, and vacancies, are a very real threat should as-of-right permissions be further restricted.

3. Needed is for Toronto to provide economic development incentives and support to existing business, not land use restrictions.

Land use changes are not what our businesses need now. The proposed changes will only serve to increase uncertainty and risk for our businesses, which have already endured significant challenges throughout the pandemic. Instead, we suggest that the City support businesses in other ways. Included should be research and consultation to understand how businesses and their needs have changed since 2013 and especially over the past 18 months.

We appreciate the opportunity to be heard, and we hope the City will be responsive to our concerns and suggestions. Please suspend the currently proposed zoning changes for employment lands, of which Emery Village is a large part, in favour of further research and consultation to ensure that the City's actions are supportive of business investment and operations in these uncertain times.

Sincerely,

Sandra Farina,
Executive Director
Emery Village BIA
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Attachments(1)

-Maps on proposed zoning changes