

14 October 2021

TRANSMITTED BY EMAIL ONLY

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

Dear Ms. Martins,

Report PH27.2, Zoning Conformity for Official Plan Employment Areas - Phase 1

I am a Registered Professional Planner retained by TGA Group to provide advice and representation with respect to the impacts of the *Employment Areas* (OPA 231) zoning conformity exercise, as recommended by City staff in Report PH25.5 and being considered by the Committee on October 18, 2021. My client owns 14 properties (see table below) across Toronto that are impacted by the proposed amendments, significantly limiting permitted land use within lands designed *Core Employment Area* and *General Employment Area*. While my client and I support land use and other tools to protect and enhance the viability of employment lands, the proposed zoning amendments may have the opposite effect.

Owned Properties (grouped by parcel)	Official Plan land use designation
5145 Steeles Avenue West	Core Employment Area
25 Clayson Road	Core Employment Area
73, 75, 77 Samor Road	Core Employment Area
2301 Keele Street	General Employment Area
15, 17, 19, 21 Milford Avenue	Core Employment Area
31 Densley Avenue	Core Employment Area
18 Ingram Drive	Core Employment Area
22, 24 Ingram Drive	Core Employment Area
28 Ingram Drive	Core Employment Area

It is my professional opinion that the City should re-evaluate the Official Plan *Employment Areas* policies that the zoning conformity exercise would implement. These policies were adopted in 2013 and some site-specific appeals are still pending. Employment areas and the market in general have undergone several changes in the past eight years, long before the current uncertainties and shifts being experienced in the wake of the COVID-19 pandemic since the beginning of 2020. More flexibility, not less, is required to ensure that Toronto's employment areas can retain and attract investment. Tightening permitted uses further, in an already restrictive planning context, could promote the further relocation of significant businesses and industry to neighbouring municipalities including Brampton and Vaughan.

The implications of the proposed changes are real. For example, 2301 Keele Street, owned by TGA Group, is located within the Lawrence Ingram Keele Business Improvement Area (LIKE BIA) and designated as a General Employment Area. The building at this location was custom renovated for a banquet hall tenant and houses an education and training centre; these are uses that would no longer be permitted under the proposed changes. While these may still operate as legal non-conforming uses, pandemic-related business interruptions in combination with the lack of long-term certainty make conditions untenable for landowners and tenants alike.

At a minimum, the Committee should defer consideration of this matter to allow City Planning and/or Economic Development staff to assess further current and emerging market conditions, and how the City's land use planning regime can evolve to reflect those conditions. Ideally, I encourage the Committee to refuse the staff recommendations and direct that a renewed planning exercise for *Employment Areas* be undertaken. Such an exercise should include updated research into the nature and needs of employment uses, landowners, and current and prospective business tenants.

Please contact me by email at sean@seanhertel.ca or telephone at 416-579-0769 should you or the Committee have any questions or require further information. I will be making a deputation at the Committee on October 18 and I request to be notified of future decisions and meetings on this matter. Thank you for the opportunity to provide comments for the Committee's consideration.

Sincerely,



Sean Hertel, MES, RPP, MCIP

Principal

- cc. Councillor Anthony Perruzza, Humber River-Black Creek
- Councillor Frances Nunziata, York-South Weston
- Councillor Mike Cole, Eglinton-Lawrence
- Mike Weber, VP operations, TGA Management Service Ltd.