



Toronto Industry Network

EMAILED

July 4, 2022

Deputy-Mayor Ana Bailao and Members of the
Planning & Housing Committee, City Hall,
100 Queen Street West,
Toronto, Ontario,
M5H 2N2.

Attn: Nancy Martins

Dear Deputy-Mayor Bailao and Members of the Committee:

Re: PH35.15 - Our Plan Toronto: Recommended Official Plan Amendment for City-wide Employment Policies and Conversion Requests - Final Report

The Toronto Industry Network (TIN) is writing to express its deep concern regarding the direction staff is taking regarding the matter of converting the City's Employment Areas to uses other than those intended for those producing value-added essential goods and functions as well as including major City-owned facilities.

The City has before it over 140 conversion applications totalling some 680 ha which represents about 8.5% of the total Employment Areas in the City. Coupled with the 275 ha still under appeal from the previous MCR (s.231), 12% of Toronto's existing Employment Area Lands are under threat of disappearing. Recognizing the almost zero percent land vacancy rate in Employment Areas, the City's own recent Land Needs Assessment (PH35.14) states that Toronto will be the equivalent of a minimum 159 ha short of employment lands if it is to make its employment targets. We say this rate of conversions is a crisis for Toronto and that granting them is very short-sighted.

The need for Employment Areas to make essential, high-value added goods for domestic use as well as export has never been greater. The increasingly unstable world we live in coupled with resulting supply chain challenges points to the requirement to make more of the goods we consume here rather than in some far away place linked to us by a tenuous supply chain. Further, the more things we make and can export beyond our borders creates more wealth for our City.

It is worth noting the Hemson report presented in PH35.14 outlines the importance of essential goods production during the COVID pandemic that was permitted while many other sectors in the City were shut down.

We hear the continuing plea for more affordable housing. The provincially mandated Land Needs Assessment (LNA) undertaken by Hemson states in the Summary: "...there is more than sufficient potential housing in areas designated for residential development in the City of Toronto to accommodate the population growth...The potential housing supply in the city is more than double the amount of housing required to accommodate the forecasted population growth between 2016 and 2051. The surplus potential housing stock after accommodating the population growth anticipated by the Growth Plan at 2051 is equivalent to almost 40 years of potential housing supply."

Toronto aggressively promotes the need for economic opportunity for Toronto's residents to achieve more social equity. We respectfully ask how converting more of its Employment Lands to other uses such as mixed use that lowers the number of floor space/jobs permitted per hectare, helps Toronto achieve its social equity goals? Employment Lands must be kept intact so that there are the well-paying employment opportunities provided by industry that will allow people to afford the ever-increasing unaffordability of housing in Toronto. According to Federal statistics, the average goods-producing job in Toronto pays \$68,000 annually plus benefits. Many experienced workers earn much more than that.

These conversion requests before you were to have been reviewed through the very specific criteria found in the Conversion and Removal Policies for Employment Areas (Section 2.2.4 Toronto Official Plan). One of these (Policy 17.c) requires consideration of meeting the Provincial Growth Plan employment forecasts. We wonder how these can be met with the removal of Employment Lands and the imposition of Employment GFA requirements below their as-of-right intensification potential? How is it that the removal of Employment Lands through conversions along with the greater encroachment of sensitive land uses will not adversely affect the overall viability of Employment Areas and maintain a stable operating environment for the policy intended to protect businesses and foster economic activity? Have the studies on the impacts of each conversion met the mitigation requirements of Section 17 (d – i)? Also, have the requirements of the LNA been considered for these conversion requests?

Coupled with the magnitude of the conversion requests, it is the effect of the provincial D-6 land use compatibility guidelines that cause considerable concern for our members. When a conversion request is granted that is within 300m and up to 1000m of a goods-producing facility, it often dictates how that facility operates and affects decisions around manufacturing processes or plant expansions. Meeting the challenges from conversions comes at the expense of the goods producer. From past experience, we have little confidence that the Site and Area Specific Policies referred to in many of the staff assessments of conversion applications will be adhered to or protect neighbouring goods producers.

In these difficult times, goods producers are faced with the challenges of competing, meeting orders, securing supply chains, finding people to work, etc. Uncertainty regarding land use jeopardizes the future of a very important part of Toronto's employment fabric. Recommending approval of the conversions before you sends a strong negative message to the essential goods producing community in our City.

We all know that approving even a few of these conversions creates the precedent for even more conversions that will eventually destabilize existing and remaining Employment Lands. An analogy is the climate change issue where the argument is put forward that a tenth of a degree Celsius increase in temperature today doesn't matter and let the future look after itself. Is the depletion of Employment Lands a sustainable solution or is it just convenient? Is removing the capability to make products the best or is it really the only way to achieve affordable housing goals?

Based on the clear requirements of the LNA and the Official Plan (Section 2.2.4), TIN respectfully asks that you recommend to Council that these conversion requests be refused thus reinforcing the policy that Employment Lands must be kept for goods producing and value-added activity.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Craig McLuckie', written in a cursive style.

Craig McLuckie,
President