



July 17, 2023

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**RE: PH5.3 - Our Plan Toronto: Recommendations on Seventy Employment Area  
Conversion Requests and Chapter 7 Site and Area Specific Policy Review - Final  
Report  
(Ward All - Statutory: Planning Act, RSO 1990)**

Members of Toronto City Council:

I am writing with respect to recommendations submitted at the Planning and Housing Committee on July 5<sup>th</sup>, 2023 relating to employment conversion requests.

We recognize the overall planning principle enunciated by City Planning Division staff who have undertaken the review of these conversion requests. The importance of the over 21,600 establishments employing nearly 400,000 is not in dispute. Employment lands constitute an integral and important role in the vitality of a municipality like the City of Toronto.

However, prudent reconsideration of the rigidity of the application of these planning principles is in order with respect to a number of the employment conversion requests submitted as part of the Municipal Comprehensive Review and the Growth Plan Conformity Exercise which the City has designated “Our Plan Toronto.”

While a sound argument can be sustained with respect to maintaining a number of these sites, perhaps even the majority, within the conventional interpretation of “employment lands,” in many cases it is simply unreflective of reality that refusals have been issued with respect to many of these conversion requests.

At a time when the City of Toronto and its residents are contending with the most impactful housing crisis ever experienced by the region it is neither responsible or practical to apply a rigid interpretation of “employment lands” which declines to seriously consider sound and positive proposals for conversions which concurrently protect employment (jobs) within the City while also creating residential housing which is so direly needed within the municipality.

Respectfully, it constitutes unsound planning practices to fail to consider positively conversion proposals that respect the need to encourage and protect employment (jobs) while working to address residential housing demands within the City of Toronto.

A variety of these conversion requests sought successfully to develop proposals that recognized the new and constantly emerging redefinition of employment within large municipalities such as Toronto while also incorporating within these complete communities housing and ancillary land uses (retail for example) that contribute positively to the City’s emerging development complexion.

It is neither sound in principle or practice to wed City planning policy too rigidly to one particular definition of employment, such as manufacturing, when in reality it is neither likely nor even possible that such work environments will be re-established on these lands. Indeed, by virtue of the fact that these uses have been abandoned on these sites long ago is demonstrative of the impracticality of these planning suppositions.

By way of example, I would call Councillors attention to the site at 340, 350, 360 and 364 Evans Avenue and 12, 14 and 16 Arnold Street (will be referred to as the “site”).

This site is adjacent to a major transportation artery and public transit services. It is located in relatively close proximity to the downtown of the City of Toronto where many of the potential residents of a future community at this location would work.

The proposal includes not only alternative employment uses (more practical for the contemporary work environment) but a net increase in actual jobs that would be undertaken on a long-term basis on the site. It further includes the creation of integrated residential housing in a city that is immersed in a generational housing crisis and in which the demand for housing increases daily.

A failure to accept the development proposal moving this site to a “mixed use” designation is not only ill-conceived but bordering on irresponsible in the context of the dire need for residential housing.

As noted, the proposal for this site (post-conversion) includes expanded employment opportunities, improved retail and perhaps most importantly more homes for people who wish to live in this City.

Surely, the latter point is the foundation upon which municipal planning principles should be based.

In this regard, I am requesting that City Council re-visit the recommended conversion approvals for sites like this one which not only adheres to sound planning principles, but which employs innovative and forward-thinking planning processes which re-imagines communities like this that can be complete, inclusive and critical to the future well-being of the City.

Thank you for your consideration of this matter and I trust you will favourably consider this request and others like it.

Yours truly,



Richard Lyall  
President  
Residential Construction Council of Ontario