

Oct 10, 2023

BY E-MAIL:
councilmeeting@toronto.ca

Mayor Chow and Members of Council,
City Hall, 100 Queen Street West,
Toronto, Ontario, M5H 2N2

Attention: Ms. Sylwia Przewdziecki

Re: Oct 11/23 City Council Item CC11.18 Our Plan Toronto: Recommendations on Five Deferred Employment Area Conversion Requests - Final Report

Dear Mayor Chow and Members of Council:

The South Etobicoke Industrial Employers' Association (SEIEA) represents a group of manufacturers and industrial businesses, across several industry sectors with operations and facilities in the South Etobicoke Employment Area.

We are requesting that Council accept the staff recommendation to retain #103 – 340-364 Evans Avenue and 12-16 Arnold Street designated as an Employment Area. Similarly, we request that Council retain the other 4 proposed conversions as Employment Areas as recommended by staff. (#019 – 3710 Chesswood Drive, #049 – 330 Queens Plate Drive, #080 – 2200-2250 Islington Avenue, #104 – 2450 Finch Avenue West. (staff requested deferral for this one))

The objective review and professional analysis by City planning staff should guide Council's decision instead of proposals by individual developers which are not publicly available for review and stakeholder consultation.

These conversions should be rejected for the following reasons:

- Employment Lands city-wide are an important, finite resource and conversions are not reversible.
- Conversion of Employment Lands is not required. The City's Land Needs Assessment determined that "there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate Growth Plan population forecasts in 2051."
- Employment Lands sustain the jobs that are an important part of the solution to housing challenges. Manufacturing jobs provide good wages and benefits, which provide the means for Toronto's residents to pay rents, save for downpayments and afford mortgages.
- City Planning staff have reviewed these conversion applications in detail, *including an additional review* as requested by Council at its July meeting, and *still recommend against conversion*.

We provide specific comments on the proposed conversion #103 in the South Etobicoke Employment Area below. This conversion would be a significant intrusion in the centre of this employment area.

Conversion # 103 in South Etobicoke: 340-364 Evans Avenue and 12-16 Arnold Street

This is an important employment area for the City and for South Etobicoke residents.

- It is among the largest in the City, providing approximately 40,000 jobs, many for South Etobicoke and Toronto residents.
- It is strategically located near major transportation networks, is a good location for many firms in Toronto's film industry and is close to the Ontario Food Terminal with many food distributors having facilities here.
- Employers are investing here and building major new industrial buildings.
- The Province has recognized the importance of this area when it designated it as a Provincially Significant Employment Zone (PSEZ).

The development proposal has serious flaws. The staff report noted at least 10 reasons that the conversion should not be made, including:

- It would break the continuity of the employment area, putting reinvestment by employers at risk.
- The area supports two of the City's important economic clusters: the food processing and film industries have many firms located here. These important clusters and their supply chains in the City would be disrupted.
- There would be a cumulative impact on the employment area as it would be a catalyst for additional conversions putting the viability of the whole area at risk.
- With its excellent highway location and access, a conversion would impact the transportation network and put the movement of goods at risk. The Provincial Policy Statement section 1.3.2.6 states "Planning authorities shall protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations."
- Residential uses do not require visibility along major highways and this land is better used for employers that do.
- Noise studies indicated that the residential development may need to mitigate against noise and vibrations from the adjacent highway.
- Because of its central location in the employment area, it will impact existing Environmental Compliance Approvals (ECA's) of area industries.

We note that the introduction of a sensitive use creates a 70-meter separation distance and 300-meter influence area requirement under MECP D1-6 Guidelines which can impact their operations and existing ECA's (Environmental Compliance Approval). This proposed conversion would be the only sensitive use within a 300-meter radius of the site and would impact a large portion of the employment area.

- Since these lands are centrally located, a conversion to a sensitive use would impact existing and future businesses' operations.

We add that many manufacturers operate 24 hours x 7 days per week, including shipping and receiving operations which generate truck traffic and noise, including audible back-up alarms

and lights and general truck traffic in their yards. Other noise sources include equipment that must be located outdoors or on rooftops.

- The staff report states that the compatibility/mitigation study submitted by the developer demonstrated that mitigation would be required for the sensitive uses. The peer review revealed 10 of the City's requirements including surrounding noise impacts, transportation noise and vibration, air quality, etc. where the information and assessment was not provided. The City's terms of reference for these studies could not be confirmed as met by the peer reviewer. The peer reviewer could not confirm compatibility.
- The lands are internally located within the Employment Area and are physically isolated from existing and planned community facilities that would be needed.
- The proposal does not provide convenient access to community services, schools (>2km) and libraries (>3km) and parks and playgrounds (>1.5km).
- Access to these services requires crossing major streets, rail corridors, highway entrance and exit ramps, some of which are not signaled.

Simply put, this is a bad location for this development, and it would create major compatibility conflicts for employers and residents alike.

City Planning staff have reviewed and assessed the developer's proposal and found at least 10 serious issues noted above including a peer review of the compatibility study that concluded it was insufficient. The Chief Planner is therefore recommending against conversion. For such a significant planning decision, Council should accept the expert and objective advice of its own planning staff over a developer's proposal which has not been made public.

We request that Council support the staff recommendation for this site, and the other 4 noted above to retain these lands as Employment Lands.

Thank you for your consideration of this matter.

Yours very truly,



Al Brezina

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cc: Councillor A. Morley