



**October 10, 2023**

**CC11.18 - Our Plan Toronto: Recommendations on Five Deferred Employment Area Conversion Requests - Final Report**

Dear Mayor Chow and Councillors,

At the Toronto & York Region Labour Council, we represent 150 unions and locals in this region with more than 220,000 working people across all sectors of the economy.

You will be considering a set of five Employment Area conversion requests at your Council meeting beginning October 11th.

While employment lands represented only 13% of Toronto's land area before this current process began, they house 25% of Toronto's jobs. Many of these are good, unionized jobs that are essential to the economic success of our city. In general, the Toronto & York Region Labour Council opposes conversion of employment areas. When we lose employment areas they are gone forever. This means moving or eliminating what are often considered to be good industrial and other jobs. It also means there is no employment land available as other employers and jobs want to move in, whether it be to support construction, green jobs, film, or other sectors. And the conversion of one employment area, especially but not exclusively to residential, can result in threats and elimination of employment in other bordering lands.

Conversion of employment areas to mixed use often happens because there is speculating on these lands or there is a sense that something positive can be undertaken at a location without an understanding of the negative consequences.

Toronto clearly needs housing, community benefits, community services, schools, etc., but there is land available for housing and services without converting employment areas.

We note that if housing is built, but there are not the appropriate services nearby or built into the planning, there is pressure on the city and partners to find ways to provide these services even if the land and planning are not yet available to support them.

In addition, when we start down the slippery slope, one conversion or partial conversion can propel other conversions because when housing is the result of the conversion, residents are likely to complain about the dirty, noisy, or intensive transportation conditions generated by nearby employers whose lands have not been converted. The same can happen if other kinds of human services (e.g., day care) are newly provided in converted lands. Complaints by users of these services can then lead to pressure to shut down these additional industries. Employment lands act as buffers for each other to a certain extent. Please keep in mind that with decisions made earlier this summer, employment lands are now down to about 10% of land in Toronto.

Here are some comments on the specific employment lands for consideration at this month's Council meeting:

3710 Chesswood Drive – These lands are part of a large stretch of employment lands that provides land use certainty for many business operations, including zoning that allows for heavy industry. Removing part of it, puts the other nearby employment lands in potential jeopardy.

330 Queen's Plate – This is pretty straightforward, as residential development is not permitted since the area is exposed to high noise levels. These lands are within the Pearson Airport area, and should be retained as employment areas.

2200-2250 Islington Avenue – Similar to Queen's Plate there are noise restrictions in place for residential uses. These lands are also within the Pearson Airport area, with access to numerous transportation options and access points, and should be retained as employment areas.

340-364 Evans Avenue and 12-16 Arnold Street – Since these lands are midpoint in a stretch of employment lands, it makes little sense to break into them, especially given their proximity to major transportation options. In addition to wanting to keep these lands ready for coming industries, we have serious concerns about the impact on surrounding industry and jobs, in this case the burgeoning film sector. Some of the Labour Council's affiliates – unions in the film industry – are part of FilmOntario, which is on record with the City of Toronto as being opposed to converting any employment lands. In this case, the nearby employment areas act as a buffer for each other. If residential or other human service uses shift into the area being considered for conversion, it may not be long before residents complain about big trucks, traffic day and night, and other concerns they may have about this sector that brings so much to the City's economy. Instead of opportunities to grow in Toronto, the film sector would be squeezed, and consider moving to other jurisdictions where employment land is more readily available. In 2021, the film sector spent more than \$2.5 Billion directly in Toronto. With the multiplier effects of this direct spending, the financial implications are huge and growing.

If this sector has to move elsewhere, their employees will need to decide whether to take longer commutes, or quit their jobs and find something close by, likely with a pay cut. Neither option is a good one. We are currently striving to reduce people's commute times, both for mental health reasons and to reduce the impact on our environment.

2450 Finch Avenue West – Again, this is an area that has other employment areas adjoining it. Changing the zoning of this address risks the future of the other areas. Changing the zoning would also force out the ten of eleven industrial tenants currently occupying the land, along with the jobs associated with the area.

We appreciate the careful analysis of staff in laying out reasons why conversion should be avoided in these cases.

Let us return briefly to the issue of housing. Mayor Chow has vowed to address the housing crisis in our City. Experts all indicate that this can be done with lands that are already available, whether already in the control of developers, coming to market, or owned by different levels of government. We do not need to dig into employment areas to find more land. Instead, we need to find a process that leads to development of truly and deeply affordable housing, with the full range of housing options that includes non-market housing. And where this truly affordable housing allows people to work near where they live.

We urge Toronto City Council to follow staff advice and vote against conversion requests.

Yours truly,



*Andria Babbington*  
President

895 Don Mills Rd, Tower Two, Suite 730  
Toronto, Ontario  
M3C 1W3