



UNIVERSITY OF
TORONTO



July 4, 2023

Councillor Brad Bradford
Chair, Planning and Housing Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: City of Toronto Planning and Housing Committee Agenda Items PH 5.2 and 5.3

Dear Councillor Bradford and committee members:

On behalf of the University of Toronto's School of Cities, I am writing to share some considerations for the Official Plan Amendment for Bill 97 Transition and the Recommendations on Seventy Employment Area Conversion Requests.

Upon review of Official Plan Amendment for Bill 97 Transition, as well as Bill 97 and the proposed Provincial Planning Statement 2023, I am struck by how many critical decisions are being made by both the City and the Province in the absence of detailed data on job growth and competitiveness (present and forecasted) in the affected industry sectors. Data could help show how employment lands are critical to the economy by:¹

- Supplying a reservoir of low-cost land and flexible buildings that supports innovative start-ups and the retention of firms as they expand;²
- Supporting jobs that pay living wages;
- Hosting back-office functions from R&D to storage to production for businesses in employment centres;
- Providing a buffer between noxious industrial uses and residential neighbourhoods;
- Ensuring that the region can support potential future job growth due to reshoring of industry and reconfiguration of downtowns.

Without such analysis, we risk losing regional competitiveness and putting living wage jobs out of reach of Torontonians.

¹ See *the Industrial Land and Jobs Study for the San Francisco Bay Area* by Karen Chapple, Evelyne St.-Louis, Sarah Ritter, Ángel Ross, Elizabeth Mattiuzzi, Mitchell Crispell, Erin Lapeyrolerie, Rebecca Coleman, and Abigail Cochran, (Berkeley, California: Center for Community Innovation, 2016). Access at <https://www.planningfor.jobs/>

² Karen Chapple, "The highest and best use? Urban industrial land and job creation," *Economic Development Quarterly* 28, no. 4 (2014): 300-313.

Toronto City Planning has enacted a careful and thoughtful process for approving employment area conversion requests. Should the Planning and Housing Committee decide to re-evaluate requests, I would suggest keeping in mind some basic principles for understanding when to release employment lands:

- Comprehensive understanding where competitive and growing industries are located, and how businesses on employment lands are connected to the rest of the economy
- Consideration of industrial vacancy rates and future land supply
- Travel patterns of workers
- Environmental and neighbourhood concerns

In case it is helpful, below I provide a decision matrix that my research team designed for the use of the municipalities in the San Francisco Bay Area:

	← RETAIN AS INDUSTRIAL	→ CONVERT TO RESIDENTIAL OR MIXED-USE
Transportation	<ul style="list-style-type: none"> • Proximity to freight and/or port facilities • Low VMT for workers on industrial land 	<ul style="list-style-type: none"> • Proximity to transit • High VMT for workers on industrial land
Economy	<ul style="list-style-type: none"> • Production or related employment • Proximity to business clusters/suppliers/markets • Critical supplier to local businesses • Industry stable or growing 	<ul style="list-style-type: none"> • High-density non-production employment • Proximity to markets/customers • Limited linkages to local economy • Industry in decline
Equity	<ul style="list-style-type: none"> • Offers middle-wage jobs for less-skilled workers 	<ul style="list-style-type: none"> • Potential for affordable housing
Land use/zoning compatibility	<ul style="list-style-type: none"> • Surrounded by medium/heavy industrial zoning 	<ul style="list-style-type: none"> • Adjacent to residential
Environment	<ul style="list-style-type: none"> • Brownfield site, remediation infeasible 	<ul style="list-style-type: none"> • Environmental health hazard for surrounding communities (especially if historically disadvantaged)
Adequacy of supply	<ul style="list-style-type: none"> • In areas with projected deficit of industrial land • Low vacancy rates for industrial buildings 	<ul style="list-style-type: none"> • In areas with projected surplus of industrial land • High vacancy rates for industrial buildings

Table 2. Suggested characteristics for industrial land retention and conversion.

Source: Chapple et al., *Industrial Land and Jobs Study for the San Francisco Bay Area* (Berkeley, California: Center for Community Innovation, 2016).

Unfortunately I am not able to attend your July 5 meeting to make a deputation in person. But please know that at the School of Cities, we stand ready to help design thoughtful approaches to ensuring Toronto has the employment lands needed to support prosperity into the future.

Sincerely,

Karen Chapple
 Director, School of Cities and Professor, Geography & Planning
 Professor Emerita, City and Regional Planning, UC Berkeley